



VEDANTA LIMITED

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

Name of the entity	Vedanta Limited
Policy Name	Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace
Version & Date	V.1 – March 21, 2016
Prepared by / Custodian	Corporate HR and HR of respective business / units

1. Introduction

Protection against sexual harassment and the right to work with dignity are universally recognised human right by various international conventions and instruments including Convention on the Political Rights of Women, 1952 and Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), 1979. The said convention was adopted by the United Nations and the Government of India have ratified the convention on June 25, 1993. The Indian Parliament has recently enacted the 'Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) 2013 (referred hereunder as 'Act') and has come into force from December 09, 2013.

Sesa Sterlite Limited (SSL or the Company) as part of Vedanta Group is an equal opportunity employer and believes in providing opportunity and key positions to women professionals. While it has been the endeavour of the Group to encourage women professionals, at the same time the Company feels that proper policies should be in place to tackle issues relating to safe and proper working conditions for women.

Sesa Sterlite Limited has an approved Business Ethics & Code of Conduct Policy under which every employee is expected to maintain highest level of integrity and ethical behaviour. The various business /divisions of the Company, viz., Sterlite Copper, Vedanta Aluminium & Power and Sesa Iron Ore had their respective sexual harassment prevention policy. However post the creation of Sesa Sterlite Limited, a need for a single uniform policy for prevention of sexual harassment which can be followed across the Company.

2. Applicability

This policy applies to all employees of the Company including all business divisions, plants, factories, marketing and regional offices, depots, Registered office, Corporate Offices (both Mumbai and New Delhi) and includes any persons on the roll of the Company including those on deputation, contract, temporary, part time or working as consultants and is deemed to be incorporated in service conditions of all employees and contract entered by the company and comes into effect immediately.

3. Objective

The purpose to this policy is to create and maintain a healthy and conducive work environment, free of discrimination. This includes discrimination on any basis, including gender and any form of sexual harassment.

4. Definition and Explanation

As per the 'Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules' sexual harassment includes such unwelcome sexually

determined behavior (whether directly or by implication) as:-

- a) Physical contact and advances;
- b) Demand or request for sexual favour/ implied or expressed threat of reprisal, for refusing to comply with a sexual request;
- c) Sexually colored remarks;
- d) Display in workplace of graphic and sexually suggestive objects, pictures or graffiti;
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- f) Reprisal or threat of reprisal against an individual for any action they take following this policy and its procedures.
- g) Any implied or expressed reward for complying with a sexually oriented advance or request.

The type of behavior described above and any such events which causes emotional trauma is unacceptable not only in the workplace, but also in other work related settings, and not limited to, such as business trips or business related social events.

Sexual harassment does not refer to normal conversation that all parties affected find acceptable. It does not refer to office relationships that are freely entered into without intimidation or coercion.

Definitions not defined and matters not specifically mentioned in the policy will be as defined and dealt with in accordance with the 'Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules'.

5. What is NOT Sexual Harassment?

Sexual harassment does not refer to normal conversation that all parties affected find acceptable. It does not refer to office relationships that are freely entered into without intimidation or coercion.

The words and expressions used in the policy shall have same definitions as provided thereto under the Act, if there arises any contradiction the interpretation given to the term/word under the Act shall sustain, and shall be taken into consideration for conducting the inquiry.

6. Internal Complaints Committee (ICC):

- 1) As per Section 4 of the Act, every employer of a workplace shall, by an order in writing, constitute a Committee to be known as the "Internal Complaints Committee" (ICC) for each of the business units, workplaces and offices. The ICC should comprise of:

(a) Presiding Officer who shall be a Senior woman employee at the workplace. In

case a Senior women employee is not available, the Presiding Officer shall be nominated from other units, offices in accordance with Sec.4 of the Act;

- (b) Not less than two members from employees preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (c) One member from NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment

Provided that at least one-half of the total Members so nominated shall be women.

- 2) The quorum for all meetings of the Complaints Committee shall be three members.
- 3) The Presiding Officer and every member of the ICC shall hold office for such period, not exceeding three years from the date of their nomination as may be specified by the employer.
- 4) In accordance with Sec.21 of the Act, the ICC shall in each calendar year prepare in the prescribed format, an annual report and submit the same to the employer and the District Officer.

The Complaints Committee shall meet at least once a month and shall submit a report to the Executive Committee in respect of each complaint, containing the evidence and findings of the inquiry along with its recommendations.

The ICC will be formed for every business / division of the Company and the local Management Committee (CMC for Sterlite Copper, BMG for Aluminium & Power and MC-SIO for Sesa Iron Ore) will appoint the members of the ICC. The Regional and Marketing Offices will be covered by the respective Business / Divisions. For Corporate Office at Mumbai and Delhi, the members of the ICC will be appointed by a Committee of CEO, CFO and Group Head HR.

7. Complaint Mechanism:

Whether or not a conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism, should be created in the Company for Redressal of the complaint made by the victim. Complaints related to sexual harassment can be notified to the 'Internal Complaints Committee' and or can also be e-mailed to sexualharrassment@vedanta.co.in.

Complaints shall be made in writing either by an email or letter, within a period of three months (or such extended time not exceeding three months as may be approved by the ICC recording the reasons for extending such time), addressed to any member of the Committee, directly by the person facing harassment or a third party. The Complainant shall state the date(s) and location of the alleged incident of harassment, sexual

harassment or abuse of authority. Name of witnesses and/or proof, which may corroborate the allegation, could also be included in the complaint. Employee can also report in whistle blowing portal. Complaints should be made at the earliest and should state the facts and names of parties involved and witnesses, if any.

When a situation arises such that, neither the aggrieved woman nor the legal heir/relatives/ other concerned notifies the complaint to the Internal Complaints Committee and the Internal Complaints Committee Members suspect that sexual harassment of a very serious nature has occurred, the Internal Complaints Committee is authorized to take suo-moto cognizance of such happening and initiate inquiry.

8. Redressal Process

All inquiries and complaints will be conducted under the principles of natural justice, and as prescribed under the Act and rules framed thereunder. ICC will provide reasonable opportunity to the complainant and the defendant. The ICC shall endeavour to complete the entire investigation process and its findings within a maximum period of 30 days.

9. Executive Committee

The Executive Committee is the disciplinary authority comprising the Head HR, Head Corporate Communications and Head Legal at the Corporate Office and at respective business divisions and will be responsible for considering the report and approving the recommendations of the Complaints Committee.

10. Disciplinary Action:

Any case of sexual harassment will amount to misconduct and will invite appropriate disciplinary action.

- a) No employee of the Company shall indulge in any act of sexual harassment of any woman at her work place.
- b) Every HOD/ (Head of Department)/ SUB Head/Branch Head who is in-charge of a work place shall take appropriate steps to prevent sexual harassment to any woman at such work place.

All Department employees, including but not limited to staff, supervisors, and senior officials, are required to comply with this policy. Employees are also expected to behave professionally and to exercise good judgment in work-related relationships, whether with fellow employees, business colleagues, or members of the public with whom they come into contact in the course of official duties. Further, all employees are expected to take appropriate measures to prevent sexual harassment.

11. Confidentiality in Investigation

All complaints shall be dealt with prompt and thorough investigation, and all information / names of employees disclosed in investigations shall remain strictly confidential to prevent

any disadvantage to the complainant or the witnesses.

If the ICC determines that a case of sexual harassment has occurred, it will take remedial action commensurate with the offense. This action may include disciplinary action against the accused party, upto and including termination. Reasonable and necessary steps will also be taken to prevent any further incidents.

If an investigation confirms that harassment has occurred, corrective action will be taken, up to and including immediate termination of employment, as appropriate. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

Strict Adherence to the policy to its true letter and spirit is required. Any construction or interpretation of this Policy should be referred to the Legal Department.

12. Awareness:

Awareness of the rights provided to female employees in this regard should be created in particular by prominently notifying the policy framework and 'the Act' in a suitable manner.

13. Notification:

All Offices, Business Divisions, Departments, Sales Depot, Branch & Regional Offices, are requested to notify the Policy related to Prohibition of Sexual Harassment and ensure implementation.

Attention in this connection is invited to the Code of Conduct and Standing Orders, wherever applicable, which provides that every employee shall at all times do nothing, which is unbecoming of an employee of the Company. Any act of sexual harassment of women employees is definitely unbecoming of an employee of the Company and amounts to misconduct. Appropriate disciplinary action should be initiated in such cases against the delinquent employee in accordance with the rules.

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