

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 1 of 17****PREPARED BY****Secretary - ICC
Mitali Patel****REVIEWED BY****Legal Coordinator
Fatima Thansiha****APPROVED BY****CHRO – Copper Business
Selva Kumaran S****DATE: 01.04.2026****DATE: 01.04.2026****DATE: 01.04.2026**

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 2 of 17**

Applicable Elements of Standard:

ISO 9001(2015)

ISO 14001(2015)

ISO 45001(2018)

VSAP

1. INTRODUCTION

Copper Business is part of Vedanta Group is an equal opportunity employer and believes in providing opportunity and key positions to women professionals. The Copper Business has endeavored to encourage women professionals and ensure that they feel safe and have safe and proper working conditions.

2. BACKGROUND:

The protection against sexual harassment and the right to work with dignity are universally recognized human rights by various international conventions and instruments such as the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW).

The said convention was adopted by the United Nations and the Government of India 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.

As stated in the Act, it aims to protect against sexual harassment of women in the workplace and to prevent and redress complaints of sexual harassment and matters connected in addition to that or incidental to that. Sexual harassment at the workplace results in violation of the fundamental rights of a woman to equality under articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under article 21 of the Constitution and her right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. Protection against sexual harassment and the right to work with dignity are universally recognized human rights by international conventions and instruments such as the Convention on the Elimination of all Forms of Discrimination against Women.

3. SCOPE:

Scope of this document is applicable to Copper Business.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 3 of 17**

4. CONTENTS

Definition and Explanation:

It has been laid down in the above Act that it is the duty of the employer or other responsible persons in working places or other institutions to prevent or deter the commission of acts of sexual harassment and to provide the procedure for the resolution, conciliation, or prosecution of acts of sexual harassment by taking all steps required. For this purpose, 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 favor/ implied or expressed threat of reprisal, for refusing to comply with a sexual request.
- c) Making Sexually colored remarks.
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal, or non-verbal conduct of a 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 following circumstances, among other circumstances, if it occurs or is present about or connected with any act or behavior of sexual harassment may amount to sexual harassment against women: —

- i. Implied or explicit promise of preferential treatment in her employment; or
- ii. Implied or explicit threat of detrimental treatment in her employment; or
- iii. Implied or explicit threat about her present or future employment status; or
- iv. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- v. Humiliating treatment likely to affect her health or safety.

"Aggrieved woman" means—

‘In relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment’.

Sexual harassment is a concern not only for women who are employed but also for those who enter the workplace as clients, customers, apprentices, daily wage workers, or in ad-hoc

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07
VER. NO. 00
SC: SVS: POL:HR 3
Page 4 of 17

capacity. Sexual harassment could also occur to visitors, contractors etc, in recognition of these concerns an inclusive definition has been provided for 'aggrieved woman'.

"Employee" means –

‘A person employed at a workplace for any work on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working voluntarily or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name’.

"Workplace" includes—

- i. Any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit that is established, owned, controlled, or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a government company or a corporation or a co-operative society.
- ii. Any private sector organization or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organization, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services, or financial activities including production, supply, sale, distribution or service.
- iii. Hospitals or nursing homes.
- iv. Any place visited either by air, land, rail or sea by the employee arising out of, or during, and in the course of employment.

"Employer" means—

- i. In relation to any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority may by an order specify in this behalf.
- ii. In any workplace not covered under sub-clause (i), any person responsible for the management, supervision, and control of the workplace.
- iii. In relation to workplace covered under sub-clauses (i) and (ii), the person discharging contractual obligations with respect to his or her employees.
- iv. In relation to a dwelling place or house, a person or a household who employs or benefits from the employment of domestic worker, irrespective of the number, time period or type of such worker employed, or the nature of the employment or activities performed by the domestic worker.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 5 of 17**

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.

5. POLICY

The proposed policy of the Company on Prohibition of Sexual Harassment (for sake of brevity referred to as the 'Policy') is guided by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

All Copper Business employees shall strictly adhere to the policy in letter and spirit and shall observe common courtesy and considerate behavior towards each other regardless of rank or contractual status.

The provisions of this Policy will apply to all the person engaged directly or indirectly of the organization. It is applicable to all the levels of the organization, irrespective of whether sexual harassment is alleged to have taken place within or outside the company premises.

POLICY STATEMENT

1. Every Employee, contractor and retainer has a right to work in a harassment-free and respectful environment.
2. Vedanta Limited is committed to address inappropriate behavior, including harassment, by or towards its employees, contractors and retainers.
3. Everyone who works for Vedanta Limited has a responsibility to sustain a respectful work environment by upholding the highest standards of conduct and applying necessary confidentiality measures.
4. Vedanta Limited will ensure that adequate resources are available to promote a positive work environment and to prevent inappropriate behaviour in the workplace.
5. The Organization will provide appropriate mechanisms to prevent or deal with retaliation related to the reporting of allegations of harassment.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 6 of 17**

6. Vedanta Limited shall prominently display notices in various places spreading awareness about the issue of "Sexual Harassment at the Workplace" and giving information about the redressal mechanism that has been put in place and encouraging women to file their grievances.
7. Filing of a complaint shall not adversely affect the complainant's status/job, salary/promotion, grades etc.
8. Employees responsible for conduct which can be construed as harassment, sexual harassment or abuse of authority may be subject to appropriate administrative or disciplinary measures.
9. Measures to deal with inappropriate behaviour (including harassment) will be based on the principles of fairness, impartiality, sensitivity, and respect.

6. INTERNAL COMMITTEE:

As per Section 4 of the Act, every employer of a workplace shall, by an order in writing, shall constitute a Committee to be known as the "Internal Committee" (ICC). The following will be the members of the Internal Committee (referred to as the 'Committee'/'Internal Committee'):

1. Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees.
2. Representative from any NGO working in the field of social empowerment of women.
3. Minimum two members amongst the employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
4. HR Head /Representative from HR Department.

The members of the committee will be approved by the Copper Management Committee (CMC) headed by the CEO/COO/CHRO. The Committee is free to call/organize meetings to review the complaints received from time to time and shall endeavor to meet at least once in every quarter. The Committee will be free to organize awareness sessions about sexual harassment and will also examine any other issues related indecent/improper behaviour. The Committee will present its finding to the Copper Ethics Committee

The representation on the Committee of the category to which the person nominated by the outgoing member shall accordingly be adjusted to ensure that no category of members is overrepresented. However, the final authority of selecting the members to be included in the committee shall vest with Copper Management Committee. In no event shall any member of Committee continue as a member for more than 3 years.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 7 of 17**

The role of internal committee includes the following:

- The Committee will enquire the complaints if any received from the women employees and submit the enquiry summary report to Copper Ethics Committee.
- The committee shall ensure the Confidentiality of the Complaint received.
- Organize Meetings at least once in every quarter to review the activities of the committee.
- Organize awareness session on Policy for Prevention, Prohibition and Redressal of Sexual Harassment at workplace.
- The Committee shall in each calendar year prepare an annual report of its activities during the year and submit the same to the Copper Ethics Committee.

All meetings will be informed at least a week in advance and the members are required to make their presence. Committee Secretary shall record the attendance and minute the proceedings of each meeting and circulate to all members.

7. COMPLAINT MECHANISM:

Whether or not such 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' through dropping the same in Complaint box made available in the unit and or can also be e-mailed to sexualharrassment@vedanta.co.in / womensniche@vedanta.co.in.

If a 'Complaint' is received by any other employee of the Company, the same should be forwarded to ICC Committee / Copper Ethics Committee.

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 (www.vedanta.ethicspoint.com). 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 women nor the legal heir/relatives/ other concerned notifies the complaint to the Internal Committee and the Internal Committee

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 8 of 17**

Members suspect that sexual harassment of a very serious nature has occurred, the Internal Committee is authorized to take suo-moto cognizance of such happening and initiate inquiry.

8. REDRESSAL PROCESS

The Complaints received should be enquired by the ICC in fair and transparent manner in view of the principles of natural justice, and as prescribed under the Act and rules framed thereunder. When the Complaint is against the CEO/COO, then in that case Internal Committee shall report its findings to the Group Ethics Committee. The Internal Committee must complete the whole process, including inquiry and submission of report in relation to a complaint within 90 days from the date of receipt of the complaint.

9. COMPLAINT PROCEDURE

The following is the detailed Complaint Procedure applicable to all employees.

- a) Complaints can be lodged directly with any member of Internal Committee against Sexual Harassment. The complaint may be oral or in writing preferably with sufficient evidence. If the complaint is oral, it shall be reduced in writing by the Internal Committee member receiving the complaint and the same shall be authenticated by the complainant under her dated signature or thumb impression. The complainant can drop the same in the Complaint box made available in the unit or can send to an e-mail to Internal Committee at sexualharrassment@vedanta.co.in / womensniche@vedanta.co.in. to register a complaint.
- b) The complaint shall state the date(s) and location of the alleged incident of harassment, sexual harassment or abuse of authority. Name of witnesses and/or documentary proof, which may corroborate the allegation, could also be included in the complaint.
- c) The Internal Committee before initiating an inquiry under section 11 of the Act shall at the request of the aggrieved woman take steps to settle the matter between her and the person against whom the complaint has been made through conciliation preferably within seven days from the date of receipt of the complaint, provided that no monetary settlement shall be made as a basis of conciliation. Where a settlement has been arrived, the Committee shall record the settlement so arrived and forward the same to the Copper Ethics Committee to act as specified in the recommendation. The Committee shall provide the copies of the settlement to the aggrieved woman and the person against whom the complaint has been made. Where a settlement is arrived at, no further inquiry shall be conducted by the Committee.
- d) In case of inquiry by the Internal Committee, the person against whom the complaint has been made and the Complainant will be advised and provided with acknowledgement copy and a copy of the complaint. The Internal Committee shall intimate along with acknowledgement copy of the complaint, the proposed date of preliminary inquiry. The date

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07
VER. NO. 00
SC: SVS: POL:HR 3
Page 9 of 17

- of preliminary inquiry shall be fixed within 10 working days from the date of receipt of the complaint. The HOD(s) of both parties will also be intimated that a complaint has been filed.
- e) Within, not more than 7 working days on the receipt of acknowledgement of the Complaint, the complainant, and the person against whom the complaint has been made shall submit, to the Internal Committee in writing, a list of witnesses, together with their contact details, that she/he desires the Committee to examine.
 - f) The person against whom the complaint has been made /complainant may submit to the Internal Committee, a written list of questions that he/she desires to pose to the complainant/ defendant/ witness. The Committee shall take into consideration those questions and pose the same during inquiry to the complainant/defendant/witness, however Committee shall retain the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, slanderous, derogatory or gender insensitive. Any behavior, verbal or otherwise, on the part of the defendant, that is designed to intimidate or subject the complainant or her witnesses to mental and physical trauma, can lead the Committee to recommend disciplinary action against the defendant.
 - g) The Internal Committee Members will investigate/interview both parties, and any witnesses. During investigation, both parties shall have the right to be accompanied by a co-worker, or another support person (limited to one).
 - h) For a committee meeting to be termed valid, the minimum quorum is 2/3rd members should be present in each committee meeting.
 - i) During the inquiry proceedings Internal Committee shall take care of the fact that the complainant and/or their witnesses and the person against whom the complaint has been made shall be called separately, to ensure freedom of expression and an atmosphere free of intimidation.
 - j) The Internal Committee shall provide reasonable opportunity to the complainant and the person against whom the complaint has been made for presenting and defending her/his case.
 - k) The Committee shall ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
 - l) No person who is a complainant, witness, or person against whom the complaint has been made in the complaint of sexual harassment shall be a member of an Internal Committee.
 - m) Any committee member charged with sexual harassment in a complaint must step down as member during the inquiry into that complaint.
 - n) If the Internal Committee decides not to conduct an inquiry into a complaint it shall record the reasons for the same in the minutes of the Committee meeting. The Committee shall make the same available to the complainant in writing.
 - o) All proceedings of the Internal Committee shall be recorded in writing. The record of the proceedings and the statement of witnesses shall be endorsed by the Presiding Officer of the committee and persons concerned in token of authenticity thereof.
 - p) All persons examined by the Committee, as well as observers/nominees/other parties involved, shall take, and observe an oath of secrecy about the proceedings to protect the

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 10 of 17**

dignity of the complainant and the defendant. Any violation of the oath of secrecy may invite penalties.

10. Findings:

- a) A copy of the inquiry findings shall made available to both parties enabling them to make representation against the findings before the Committee.
- b) After conducting inquiry proceedings, the Presiding Officer of the Internal Committee shall convene a meeting to provide an opportunity for both the parties enabling them to make representation against the findings before the Committee.
- c) After hearing both parties in detail, the Internal Committee shall discuss and formulate the 'Inquiry Report' and recommend disciplinary action, if any on the subject complaint. The Presiding Officer of the Internal Committee shall forward the Inquiry Report, together with a summary of the opinions of the members of the Committee (including dissenting opinions) to the Copper Ethics Committee.
- d) The Committee shall strive to complete the inquiry in the shortest possible time and file its Inquiry report in relation to investigation to the Copper Ethics Committee within 3 months from the date of receiving the complaint, recommending necessary action. The Internal Committee shall be required to provide to the Copper Ethics Committee reasons in writing for any delay in concluding the inquiry beyond a period of 3 months.
- e) The report so submitted shall detail the proceedings of the inquiry, the statements of the complainant, the person against whom the complaint has been made, other witnesses, discuss the evidence, its findings and reasons for the same, views of individual members of the committee towards the evidence/complaint and its collective recommendations regarding the nature of disciplinary action, if any.

No observations regarding the work and behavior of either the complainant or person against whom the complaint has been made shall be made which are not related to the alleged act of sexual harassment in the report. However, the Committee may consider as relevant any earlier complaints of sexual harassment against the person whom the complaint has been made.

11. Decision:

- a) Upon receipt of the Inquiry Report the Copper Ethics Committee will promptly act on the Inquiry report. If the Copper Ethics Committee disagrees with or wishes to modify the recommendations made by the Committee, it may do so by recording the reasons in writing. The same shall also be communicated in writing to the concerned Committee.
- b) Copper Ethics Committee shall however take disciplinary action only after giving the person whom the complaint has been made an opportunity to reply to the findings of the Committee through an oral or written representation in accordance with the service rules and principles of natural justice.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07
VER. NO. 00
SC: SVS: POL:HR 3
Page 11 of 17

- c) The Copper Ethics Committee will recommend what action, including appropriate disciplinary action if any, is to be taken within 30 days from the date of submission of the report by Internal Committee. This will further go to the Group Ethics Committee and their decision along with the inquiry report shall be communicated in writing to both parties and the Committee.
- d) No person accused of an act of Sexual Harassment under this policy shall be part of the decision-making process referred to hereinabove.

12. DISCIPLINARY ACTION:

- a. Any act of sexual harassment of women employees is unbecoming of an employee of the Company and amounts to misconduct. Appropriate disciplinary action would be initiated in such cases against the delinquent employee per the rules.
- b. No employee of the Company shall indulge in any act of sexual harassment of any woman at her workplace.
- c. Every HOD/ (Head of Department)/ SUB Head/Branch Head who is in-charge of a workplace shall take appropriate steps to prevent sexual harassment to any woman at such workplace.
- d. 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.

12.1. **Section 75 of the Bharatiya Nyaya Sanhita (BNS), 2023**, defines the offence of sexual harassment and prescribes punishments for it. The section applies to a man committing any of the following acts:

- I. Physical contact and advances involving unwelcome and explicit sexual overtures.
- II. A demand or request for sexual favours
- III. Showing pornography against the will of a woman.
- IV. Making sexually coloured remarks.
- V. Such acts constitute the offence of sexual harassment

Punishments under Section 75:

- I. For acts under clauses (i), (ii), and (iii) (physical contact/advances, demand/request for sexual favours, showing pornography against will), the punishment is rigorous imprisonment for a term which may extend up to three years, or fine, or both. There is no minimum imprisonment prescribed, but the maximum is three years, and the imprisonment is rigorous
- II. For the act under clause (iv) (making sexually coloured remarks), the punishment is imprisonment of either description (simple or rigorous) for a term which may extend up

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 12 of 17**

to one year, or fine, or both. Again, no minimum term is specified, and the maximum imprisonment is one year.

12.2. Under POSH Act and Rules 2013:

- I. Once the Internal Complaints Committee (ICC) or the Local Complaints Committee (LCC) concludes the inquiry and determines the respondent's guilt, the employer is required to initiate disciplinary action against the respondent.
- II. The nature and extent of disciplinary action depend on the organization's policies and practices. It may include warnings, reprimands, suspension, demotion, withholding of increments or promotions, or termination of employment, as deemed appropriate by the employer.

13. RIGHTS OF PERSON AGAINST WHOM THE COMPLAINT HAS BEEN MADE:

Alleged offenders have the right:

- a) To be informed that a complaint has been filed.
- b) To have a copy of the complaint, stating the allegation(s) and the name of the complainant.
- c) To respond to the allegation(s).
- d) To be accompanied during investigative interviews by a co-worker, or another support person.
- e) To be informed in writing of the Group Ethics Committee decision on what action, if any, will be taken and the reasons for that decision.

14. RESPONSIBILITIES OF A MANAGER OR HOD:

Managers and HODs are responsible for ensuring that the workplace is free from sexual harassment.

Take preventive action.

- A. Managers /HODs are required to discuss the policy at staff meetings and make sure that all employees and supervisory staff are aware of what action to take if harassment occurs. Managers/HODs must also set the appropriate standard of conduct through their own behavior.
- B. When approached by an employee with a complaint Managers/HODs must be supportive and explain what options are available. Managers/HODs should also find out how the employee prefers to deal with the situation and address any concerns the employee may have about filing a formal complaint. Finally, Managers/HODs must keep a confidential record of all pertinent information.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 13 of 17**

- C. If the employee files a formal complaint, Managers/HODs must aid as required and be available to discuss any concerns that the employee may have. Cooperation with the members of the Internal Committee is also required.

15. DUTIES /POWERS OF THE INTERNAL COMMITTEE:

- a) The Internal Committee may call any person to appear as a witness if it is of the opinion that it shall be in the interest of justice.
- b) The Internal Committee shall have the power to summon any official papers or documents pertaining to the complaint under inquiry.
- c) The Internal Committee may consider as relevant any earlier complaints against the person against whom the complaint has been made.
- d) The Internal Committee shall have the right to summon, as many times as required, person against whom the complaint has been made, complainant and/or any witnesses for the purpose of supplementary testimony and/or clarifications.
- e) The Internal Committee shall have the right to terminate the inquiry proceedings and to give an expert decision on the complaint, should the person against whom the complaint has been made fail, without valid ground, to present himself for two consecutive hearings convened by the Internal Committee.
- f) The Internal Committee shall have the right to penalize such persons/witnesses who breaches the oath of secrecy with reference to complaint/proceedings.
- g) The Internal Committee shall not permit any evidence or examination based on the aggrieved woman's character, personal life, conduct, personal and sexual history in course of inquiry proceedings.
- h) The Internal Committee, shall have following other power:
 - (a) Summoning and enforcing the attendance of any person and examining him on oath.
 - (b) Requiring the discovery and production of documents; and
 - (c) Any other matter which may be prescribed.
- i) During the pendency of an inquiry, on a written request made by the aggrieved woman, the Internal Committee, or the Local Committee may recommend to the employer to
 - a) transfer the aggrieved woman or the respondent to any other workplace; or
 - b) grant leave to the aggrieved woman up to a maximum period of three months; or
 - c) grant such other relief to the aggrieved woman it may deem fit.
- j) The Internal Committee reserves the right to suspend an employee against whom a complaint of sexual harassment has been filed, after a preliminary investigation reveals prima facie evidence of misconduct.
- k) When an employee of another organization is the subject of a complaint, the Internal Committee of the respondent's organization can collaborate with the Internal Committee of the complaint's organization to handle the complaint through a joint investigation. To ensure a comprehensive and fair investigation of the complaints, the joint investigation will involve collaborative evidence collection, shared interviews, and

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07**VER. NO. 00****SC: SVS: POL:HR 3****Page 14 of 17**

mutual consultation. The ICC may move on with the inquiry based on prima facie evidence if the ICC of the other organization refuses to cooperate or take part in the joint investigation.

- l) The Internal Committee shall in each calendar year prepare an annual report of its activities during the year and submit the same to the Copper Ethics Committee.

16. WRONGFUL ACCUSATIONS:

When the facts appear to substantiate the conclusion that the Complainant has intentionally made false statements in connection with the lodging of a formal complaint, Internal Committee shall immediately recommend Copper Ethics Committee for appropriate disciplinary action/penalty against him/her.

17. AWARENESS:

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

18. NOTIFICATION:

All Departments, Sales Depot, Branches, and subsidiary companies, if any are requested to notify the Policy related to Prohibition of Sexual Harassment and ensure implementation.

Attention in this connection is invited to the Standing Orders (amended) which provides that every employee shall at all times do nothing, which is unbecoming of an employee of Copper Business/Vedanta Group. Any act of sexual harassment of women employees is 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.

19. THIRD PARTY HARASSMENT:

Where sexual harassment occurs because of an act or omission by any third party or outsider who is entering the Company premises or with whom the Company has business association, the Company will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

The Policy will be reviewed from time to time by the Committee and changes, if any will be recommended by the Committee to CMC, who shall approve/reject the same after review.

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07
VER. NO. 00
SC: SVS: POL:HR 3
Page 15 of 17

20. ICC COMMITTEE MEMBERS:

Silvassa + Marketing Location	Role
Ms Satyjyot Kaur (CHRO- Silvassa)	Presiding Officer
Ms Mitali Patel (Lead TM & PMS)	Secretary
Mr Subash Nerooda Head Production - SC	Member
Ms Raghmani Nalam Head IDT- SC	Member
Mr Vujji Jagadeesh Head HSE - SC	Member
Ms Nitika (Lead Compliance – Silvassa)	Member
Ms Soniya Singh	NGO Partner

Tuticorin IBU	Role
Ms A Sumathi (COO- Tuticorin IBU)	Presiding Officer
Mr Ramesh Ganesh (Head -Instrumentation)	Member
Ms Sonia Alappat (Head – TA & TM)	Member
Mr Niraj Sultania (Head Legal – Copper)	Member
Ms C Kalyani (Team Member – Planning)	Member
Ms V Jeyakani	NGO Partner

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07
VER. NO. 00
SC: SVS: POL:HR 3
Page 16 of 17

MALCO Energy Limited - Nickel Business	Role
Ms Ankita Sharan (CMO - Copper & Nickel)	Presiding Officer
Mr Anuj Sankaw (Head - Engineering Services- Nickel)	Member
Ms Reema D'silva (Dy. Head Stores – Nickel)	Member
Ms Suphal Shirwaikar (HRBP- Nickel)	Member
Ms Fatima Thansiha (Lead Compliance- Silvassa)	Member
Ms Soniya Singh	NGO Partner

Fujairah Gold	Role
Ms. R Kaveri (Lead Marketing Back Office)	Presiding Officer
Mr. Gaurav Goyal (COO- FG)	Member
Ms. Nilofar Sayed (CHRO-FG)	Member
Ms. Rubina Tabasum (Lead HR)	Member
Mr. A Ramachandran (Head – HSE)	Member
Mr. Amit Choudhary (Dy. Head Security)	Member

POLICY: PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

REV.NO. 07

VER. NO. 00

SC: SVS: POL:HR 3

Page 17 of 17

21. AMENDMENT HISTORY

Sr. No	Previous condition (Before this revision)	Present condition (Reason made)	Previous Rev. No.& Issue date	Current Rev. No & Issue date
1	Company Logo and Name	POL Reviewed: Format and Logo changed	Rev. No:00 Issue date: 01.04.2022	Rev. No:01 Issue date: 01.04.2022
2		POL Reviewed: Changes in contents	Rev. No:01 Issue date: 01.04.2022	Rev. No:02 Issue date: 24.07.2023
3		POL Reviewed: Changes in contents	Rev. No:02 Issue date: 24.07.2023	Rev. No:03 Issue date: 28.06.2024
4		POL Reviewed: Changes in Contents & Committee	Rev. No:03 Issue date: 28.06.2024	Rev. No:04 Issue date: 03.01.2025
5		POL Reviewed: Changes in Contents & Committee	Rev. No:04 Issue date: 03.01.2025	Rev. No:05 Issue date: 28.07.2025
6		POL Reviewed: Changes & Committee	Rev. No:05 Issue date: 28.07.2025	Rev. No:06 Issue date: 11.09.2025
7		Revision of Nickel Committee Members	Rev. No:06 Issue date: 11.09.2025	Rev. No:07 Issue date: 01.04.2026
