

Vedanta Limited

EQUAL OPPORTUNITY POLICY

Preamble and Overview:

At Vedanta, we recognise the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect, care, fairness, sensitivity and dignity. Workforce diversity is a business imperative at our organization and we strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be equipped to deliver better business results.

This Equal Opportunity Policy ("Policy") applies to all Vedanta Limited ("Company") employees ("employees") and its operations. This Policy will be a guiding document for business partner workforce, interns/trainees including temporary employees. Vedanta Limited aims to create employment opportunities such that all employees achieve their full potential

I Policy Statement:

It is the policy of Vedanta to provide equal employment opportunities, without any discrimination on the grounds of age, colour, disability, marital status, nationality, geography, ethnicity, race, religion, sex, sexual orientation. It is our endeavour to maintain a work environment that is free from any harassment, bullying, direct or indirect discrimination based on above considerations. This Policy is subject to applicable regulations, qualifications and merit of the individual.

The Policy is consistently applied throughout the period of employment of the individual right from the recruitment process till superannuation.

II Equal Opportunity for Persons with Disabilities

Vedanta is committed to providing equal employment opportunities in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 and the Rules thereunder (as may be amended from time to time) without any discrimination on the grounds of disability and will take all actions to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same. In furtherance of the same, the Company shall:

- Ensure personal liberty, equality and non-discrimination of any kind, for disabled persons at the workplace. Discourage all factors which hamper full and effective participation of persons with disabilities in the Company.
- Provide appropriate facilities and amenities to persons with disabilities so that they may effectively discharge their duties in the establishment.

- Give preference to persons with disabilities in transfer, posting and allotment of residential accommodation wherever possible.
- Employ persons with disabilities wherever practicable, when it is suited to their
 aptitudes, abilities and qualifications and ensure no opportunity is denied to persons
 with disabilities, merely on ground of disability.
- Provide persons with disabilities with the same opportunities for promotion, career development and training as those afforded to other employees.
- Encourage the professional development of persons with disabilities by providing the necessary facilities or training as required.
- Construct and provide infrastructure as well as make available assistive devices that
 may be required, such as walk and path levels, grooves and gratings, guiding and
 warning blocks, proper signages to barriers and hazards, transport and parking
 facility etc.

III Equal opportunity for Transgender Persons

Vedanta is committed to providing equal employment opportunities in accordance with the provisions of The Transgender Persons (Protection of Rights) Act, 2019 and Rules thereunder (as may be amended from time to time) for transgender persons and will take all actions to ensure that a conducive environment is provided to them to perform their role and excel in the same. In furtherance of the same, the Company shall:

- Provide a safe working environment and ensure that no transgender person is discriminated in any matter relating to employment including infrastructure adjustments, recruitment, employment benefits, promotion, career development and training as those afforded to other employees.
- Ensure infrastructural facilities (such as unisex toilets), measures for safety and security (transportation and guards) and amenities (such as hygiene products) to be provided to the transgender persons to effectively discharge their duties; applicability of all rules and regulations of the employer regarding service conditions; and maintenance of confidentiality of the gender identity of the transgender employees.

Transgender persons or persons with disabilities who apply or employees who believe themselves to be covered under The Transgender Persons (Protection of Rights) Act, 2019 or The Rights of Persons with Disabilities Act, 2016 respectively, may contact the Human Resources Representative in any given location. Any information provided is voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide information will not subject an employee or applicant to any adverse treatment. Employees and applicants will be protected from coercion, intimidation, interference, discrimination, or retaliation for filing a complaint or assisting in an investigation under the Acts.

Responsibility:

 Every employee of Vedanta is responsible giving effect to this Policy. They must promote and live the values of Equal Opportunity by depicting the respect, care, sensitivity and dignity. Employees need to monitor the work environment to ensure

- that it is free from discrimination and harassment and encourages inclusion and respect for others.
- HR shall appoint a Liaison Officer who shall preferably be a representative of the Management Committee employed at a senior level and in this role will be reporting to the Chief Human Resource Officer of the Company.

Liaison Officer will be responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for persons with disabilities by liaising with the various departments in the organisation.
- Shall oversee the provision of required facilities/amenities including the process of recruitment for transgender persons or persons with disabilities.
- Ensuring that all employees are aware of the Equal Opportunity Policy and knows their duties and rights in relation to the Equal Opportunity Policy.
- The Liaison Officer to share the progress report periodically and an annual assessment report with the CHRO who would then present the progress/assessment report to the respective CEO.
- It shall be the functional responsibility of the Human Resources Department to ensure compliance with this Policy and implementation of related programs and to report findings and progress to the senior management.
- Each Company location is responsible for obtaining and utilizing up-to-date information
 - regarding applicable state and local laws and regulations.
- All employees are encouraged to report any incidents of violation of this Policy and Managers should act promptly when concerns arise, or complaints are made.
- Any employee who violates this Policy, or in any manner discriminates against any
 person or otherwise harasses or harms them shall be deemed to be in breach of the Code
 of Conduct of the organization, and shall be appropriately dealt with, along with actions
 that can be taken under this Policy or any other action that the management may deem
 fit.
- The Head HR of each location will be overall responsible to oversee and promote the
 effective operation of this Policy and will be accountable to their respective Chief
 Executive Office.

Grievance Procedure:

- Individuals have the right to file a complaint concerning any discrimination on the grounds of age, colour, disability, marital status, nationality, race, religion, sex, sexual orientation with the Grievance Officer/Complaints Officer, who then reports to the Grievance Redressal Committee of the respective Unit.
- The Grievance Officer/Complaints Officer and the Committee will follow the
 procedure of Grievance redressal as outlined in the Guidelines for conducting the
 Enquiry. On investigation, if the employee against whom the complaint has been made
 is found guilty of discriminatory behaviour, they will be subjected to disciplinary
 actions.

Grievance Redressal Committee:

• The Grievance Redressal Committee already institutionalized at each location will take up the grievances received under the Equal Opportunity Policy.

Communication of the Policy:

- This Policy will be available to all employees via the Company's Intranet sites and normal communication vehicles within the business.
- Suitable material will be included in Company publications, management conferences, and supervisory training courses.
- All recruitment literature and employment advertising will indicate that the Company is an Equal Opportunity Employer.

Amendment:

This Policy may be amended as and when required to do so under an obligation of statute or management call and the Group CHRO will be authorized to release such amendment.

HR ManCom March 2021