



ADANI ELECTRICITY MUMBAI LIMITED

PREVENTION OF SEXUAL HARRASMENT POLICY

1. Introduction

1.1. Sexual Harassment can be defined as unwelcome sexual advances, requests for sexual favours, and other verbal and physical conduct of a sexual nature by any person(s) in the following situations:

1.1.1. When unreasonable conduct is expected from the employee and the same is made a term or condition of the individual's employment; either explicitly or implicitly.

1.1.2. When employment decisions like equal opportunities and career development of an individual are affected or denied due to submission to or rejection of such conduct by any individual; or

1.1.3. When the conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

1.2. Such conduct includes, but is not limited to the following:

1.2.1. Unwanted physical contact or conduct of any kind, including sexual flirtations, touching, molestation, advances, or propositions;

1.2.2. Verbal Harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references;

1.2.3. Demeaning, insulting, intimidating or sexually suggestive comments (oral / written) about an individual's personal appearance or electronically transmitted images / messages;

1.2.4. The display in the workplace of demeaning, insulting, intimidating, pornographic or other offensive or derogatory or sexually suggestive objects, pictures, photographs;

1.3. Harassment that is unchecked has the potential to hurt the Organisation's brand image as well as operations through decreased productivity and increased employee turnover.

2. Objective

- 2.1. To create awareness amongst employees regarding harmful effects of Sexual Harassment on a healthy work environment.
- 2.2. To avoid tolerance of any verbal or physical conduct of a sexual nature by any employee who harasses, disrupts, or interferes with another's work performance or conduct that creates an intimidating, offensive, or hostile environment.
- 2.3. To prescribe appropriate treatment / punishment to the guilty for indulging in any activity related to sexual harassment.

3. Scope

- 3.1. The policy is applicable to all executives / non-executives / trainees / consultants / OSDs / contract labour / or employees of any third party appointed by the Organization within Adani Electricity Mumbai Ltd.
- 3.2. The policy applies to all persons irrespective of race, caste, creed, religion, physical disability, family background, or age.
- 3.3. This policy is applicable to all allegations made against an individual, irrespective of whether sexual harassment is alleged to have taken place within or outside company premises at any place visited by the employee arising out of or during the course of employment.

4. Policy

- 4.1. Sexually Harassing or offensive conduct is prohibited in the work place, whether committed by executives / non-executives / consultants / OSDs / contract labour / or employees of any third party appointed by the organization to carry out its outsourced activities.

- 4.2. Any of the above conduct, directed at individuals because of their race, caste, creed, religion, physical disability, family background, pregnancy or age is also prohibited.
- 4.3. Sexual Harassment shall be treated as misconduct and appropriate action shall be initiated for such misconduct.
- 4.4. In case of a complaint being investigated, all the employees involved shall make available to the Internal Complaints Committee such information, as it may require having regard to the complaint made.
- 4.5. A person knowingly making a false claim or producing a forged / misleading document during investigation shall be subject to disciplinary action as per the Discipline Policy. Provided that mere inability to substantiate a complaint or provide adequate proof should not attract action against the complainant.

5. Internal Complaints Committee

- 5.1. Business-wise Internal Complaints Committees have been constituted for redressal of complaints related to sexual harassment. (Business-wise Committee constitution attached as Annexure1).
- 5.2. The Internal Complaints Committees have the following composition:
 - 5.2.1. Presiding Officer, who shall be a senior level woman. In case a senior level woman employee is not available, the Presiding Officer shall be appointed from a sister organization;
 - 5.2.2. Not less than two members from amongst members shall be committed to the cause of women or who have had experience in social work, or have legal knowledge;
 - 5.2.3. One member from a nongovernment organization or association committed to the cause of women, or person familiar with the issues of sexual harassment.
 - 5.2.4. Provided that at least fifty per cent of the members so nominated shall be women.

- 5.3. Term of Committee members shall be 3 years, after which Committee Constitution shall be reviewed.
- 5.4. The Committee shall have the power to:
 - 5.4.1. Summon and enforce attendance of any person and examine him / her;
 - 5.4.2. Require the discovery and production of documents; and
 - 5.4.3. Any other power as prescribed.
- 5.5. The Committee may direct such person to produce such documents / information by serving a notice in writing, summoning the person, or calling for such documents or information at such place and within such time as may be specified.
- 5.6. Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the Committee shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.
- 5.7. Upon production of documents / information called for by it, the Committee shall have the power to (i) make copies of such documents / information or extracts there from; or (ii) retain such documents / information for such period as may be deemed necessary for purposes of the proceedings before it.
- 5.8. The Committee shall have the right to put questions to witness, seek clarification of documents and/or other material available on record.
- 5.9. The Committee shall have the power to issue interim directions to any employee participating in the proceedings before it.
- 5.10. The Committee shall have the power to recommend the action to be taken against any person found guilty of (a) sexually harassing the complainant; (b) retaliating against / victimizing the complainant or any other person before it; and (c) making false charges of sexual harassment against the accused person; (d) giving false evidence during enquiry into the allegations of sexual harassment; and (e) forging documents to substantiate a false charge or support a false defense.

6. Procedure

6.1. All persons covered under this Policy have the responsibility to report or complain about actions or words of any other person (as given in the scope of this topic) which constitute harassment.

6.2. Complaint Procedure and Guidelines

6.2.1. The report or complaint shall be made, along with any supporting documents, in writing, over E-mail or orally, to the Reporting Officer or the Head of the Department or any member of Internal Investigation Committee constituted for the business. Any reports or complaints can also be made anonymously pursuant to the procedures set forth in the Vigil Mechanism Policy, Section 5.

6.2.3. Where the aggrieved person is not able to make a complaint on account of physical or mental incapacity or death or otherwise, a friend, co-worker, legal heir or an immediate family member may make a complaint.

6.2.4. The receiver of the complaint shall refer the complaint to the Internal Complaints Committee without any delay.

6.2.5. The Internal Complaints Committee shall make inquiry into the complaint in accordance with the principles of natural justice

6.2.6. Complaints of harassment shall be handled and investigated promptly as per the Investigation Procedure and in a mature, impartial and confidential manner.

6.2.7. Any employee involved in the complaint procedure shall be treated courteously, sensitively and based on the gravity of the situation.

6.2.8. Employees are required to cooperate in every investigation.

6.2.9. Each case shall be duly recorded and documented by Internal Complaints Committee.

6.2.10. During the pendency of enquiry, on a written request made by the aggrieved employee, the organization may transfer the aggrieved or the

respondent to any other workplace; or grant paid leave to the aggrieved for a maximum period of Three months.

6.3. Investigation Procedure

6.3.1. A timely investigation of allegations of sexual harassment is important. A complaining employee or unjustly accused individual also may suffer increasing emotional distress if any resolution is delayed.

6.3.2. Typically, the investigator(s) from the Committee shall be mature and trained to conduct sexual harassment investigations. The investigator shall be sensitive to the emotional nature of this type of investigation. He shall also understand what constitutes sexual harassment under both, the Organization's policy and the law in order to evaluate the complaint properly. The investigator shall not be related to the complainant or the alleged harasser, apart from the business relationship.

6.3.3. The process shall provide a fair method for both sides to be heard and to receive information. The organization and its investigator shall not prejudge the alleged harasser's guilt.

6.3.4. Witnesses shall be interviewed as soon as possible. All responses shall be documented and if possible statements shall be written and signed by the person providing the information. In addition, all participants in the investigation shall be reminded that their cooperation and confidentiality are required.

6.4. Interviewing the Involved Parties

6.4.1. The investigator needs to be prepared to deal with the complaining employee's embarrassment and anger by patiently but firmly explaining that details are needed for an accurate investigation.

6.4.2. The complaining party shall be interviewed first, to ensure that all important details and witnesses are identified promptly.

6.4.3. It is important for interviewers to be objective and non-judgmental and allow the alleged harasser to respond to each allegation. The investigator shall

inform him of the type of disciplinary action that may be taken if the allegations are found to be true.

6.4.4. Both parties shall be told to avoid contact with one another, and ways to minimize contact shall be implemented.

6.4.5. The complaining employee shall be encouraged to report any further incidents of harassment or retaliation.

6.4.6. Witnesses shall be told as little as possible about the details of the complaint in order to reduce the employer's exposure to later claims of defamation.

6.4.7. The investigator shall recognize that there might be no eye witnesses. Thus the employer may have to resolve a sexual harassment claim based on circumstantial evidence and credibility of the parties.

6.4.8. Based on the investigation proceedings, Committee shall recommend further course of action and submit the Committee Report to Head HR for implementation.

7. Documentation

7.1. Each complaint received by Internal Complaints Committee shall be duly recorded and documented by them.

7.2. All the relevant documents / statements shall also be maintained.

8. Consequences of Violation of the Policy

8.1. Any employee, supervisor, or manager who is found to have violated the Prevention of Sexual Harassment Policy will be subject to appropriate disciplinary action, up to and including termination. The company prohibits any form of retaliation against employees for bringing good faith complaints or providing information about harassment. However, if on investigation a complaint or information is found to have been intentionally false, the individual who provided the false information will be subject to disciplinary action as per the Discipline Policy.

9. Protection

9.1 Those who refuse to participate in actions that may violate this Policy or who report another's wrong-doing, are sometimes worried about possible repercussions. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in any action that violates this Policy or because of reporting their suspicion in good faith that an actual or potential act that violates this Policy has taken place or may take place in the future. If any employee believes that he / she has suffered any such treatment, he / she should inform the Reporting Officer or the Head of the Department or any member of the Internal Investigation Committee in accordance with the procedures outlined at 6.2.

10. Display & Communication of Policy

- 10.1. The Policy shall be displayed to all employees through intranet portal of the Company, under the Section of 'Standards of Conduct' Policies.
- 10.2. Any changes in the Policy and / or Internal Complaints Committee shall be notified through the intranet portal by way of updated Policy document.
- 10.3. The Policy Awareness shall be conducted regularly through various discussion / communication forums.

Internal Complaints Committees

1. Under the Policy on Prevention of Sexual Harassment at Workplace, business-wise Internal Complaints Committees (ICC) have been constituted.

2. Names of Committee Members are as under:

SN	Business	Committee Member	Presiding Officer	Contact No of Presiding Officer
1	Corporate Level	Smita Shilwant Chanda Vanmali Manoj Sharma Abhijit Banerjee	Smita Shilwant	Smita.shilwant@adani.com
2	Mumbai Distribution	Chanda Vanmali Minal Patil Chandrakant Sawant Aditi Mane	Chanda Vanmali	Chanda.Vanmali@adani.com
3	Mumbai Transmission	V D Vini Deep Gupta Swapna Chobhe Shree Agarwal	V D Vini	Vini.Vazhappully@adani.com
4	Dahanu	Duhita Birje Anil Chaudhary Vishnu Sonune Sucheta Patil Chanda Vanmali	Duhita Birje	Duhita.Birje@adani.com

**External ICC Member: Adv. Shilpa Bhatia