

ANTI-HARASSMENT POLICY

Company:	Vedanta Iron and Steel Limited (“VISL”)
Name of the Policy:	Anti-Harassment Policy
Version:	1.0
Effective Date	May 01, 2026

A. Intent

Vedanta Iron and Steel Limited (“VISL” / “Company”) aims to create and maintain a conducive work environment in which people are treated with dignity, decency and respect. The Company strives to create an environment characterized by mutual trust and the absence of intimidation, oppression, and exploitation, free of discrimination or harassment of any kind. Through implementation of this policy and by training, mentoring and guidance, the Company will seek to prevent, correct, and discipline behaviour that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy in letter and spirit and to take appropriate measures to ensure that conduct prohibited under this Policy does not occur. This Policy also applies, as relevant, to interns, trainees, consultants, contract workers, agency personnel, and any person interacting at the workplace or in the course of work.

B. Types of Harassment

The following, without limitation, are considered forms of harassment and will warrant investigation and appropriate action:

- i. Sexual Harassment:** The definition, scope and redressal mechanism shall be governed by the “Internal Complaints Committee” (ICC) as per the Company’s “Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace”, available on the Company website at www.vedantaironandsteel.com.
- ii. Other (non-sexual) Harassment & Discrimination:**
 - a. “Bullying” / “Workplace Violence” – Bullying / Workplace Violence includes offensive, intimidating, malicious, insulting, abusive, coercive or threatening behaviour, whether verbal, non-verbal, written or physical, that creates an intimidating, hostile or humiliating work environment. We do not tolerate violent acts or threats of violence, verbal, non-verbal or in writing. We will not tolerate fighting, bullying, coercion, or use of abusive or threatening words or actions

directed to, about, or against any employee of the Company or any other person covered by this Policy.

- b. “Discrimination” – Defined as unfair treatment (e.g., including, without limitation, impediments) to promotion or other adverse treatment on the basis of protected characteristics mentioned in point i. above, any form of discrimination against an employee is strictly prohibited, including but not limited to discrimination on the basis of race, skin colour, caste, religion, ethnicity, national origin, sex (including pregnancy), age, disability, class, place of birth, HIV status, sexual orientation, gender identity, marital status, religious belief or lack thereof, life expectancy, or any other status protected by the laws or regulations in the locations where we operate.

The policy should be interpreted and applied in a manner that reinforces the purpose for which it was created. Retaliation of any sort for filing a claim or complaint of harassment, or for participating in an investigation in good faith, will not be tolerated and may itself be treated as misconduct under this Policy.

C. How to Report

Reports under this policy may be made to the Internal Committee (“IC”) only where the complaint relates to sexual harassment covered under the Company’s “Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace” “POSH Policy”. Complaints relating to non-sexual harassment, bullying, discrimination or workplace violence may be reported to the designated HR representative, Ethics / Compliance function, reporting manager, functional head, or such other committee / authority as may be notified by the Company from time to time. Details of the IC are set out under heading 5 of the Company’s POSH Policy, available on the Company website at www.vedantaironandsteel.com.

In matters relating to sexual harassment, the role, powers, process and recommendations of the IC shall be governed by the Company’s POSH Policy and applicable law. In matters relating to non-sexual harassment, bullying, discrimination or workplace violence, the designated committee / authority shall review the matter and recommend or initiate

appropriate remedial, corrective or disciplinary action in accordance with applicable law, service rules, standing orders and Company policies.

Nothing in this Policy shall limit any statutory right or reporting obligation available under applicable law. The IC or the designated committee / authority, as applicable, may be responsible for, including but not limited to:

- i. Informing the complainant and respondent(s), as appropriate, of the applicable process, their rights and obligations, and the seriousness with which the Company treats such matters.
- ii. Arranging for prompt, fair and appropriate review / investigation of alleged misconduct.
- iii. Making recommendations for appropriate remedial, corrective or disciplinary action to designated Company officials.
- iv. Exploring informal resolution only where appropriate, legally permissible, not inconsistent with the applicable POSH framework.
- v. Notifying or assisting in notifying appropriate authorities where alleged infractions exceed the Company's internal authority, require external reporting, or involve criminal matters, subject to applicable law and Company procedures.

D. Escalations & classification of Disciplinary Action

All individual team members, managers, and leaders will be subject to disciplinary action, up to and including termination of employment, for any act of harassment they commit. Although disciplinary action will be at the discretion of the Committee or the relevant decision-making authority, as applicable, in each case after the investigation, it can generally be classified into four (4) levels. These levels are indicative only and do not create a mandatory order of escalation. The disciplinary action imposed will depend on the severity, impact, facts, circumstances, and recurrence of the conduct.

The levels are as follows:

- i. **Level 1: Minor Infractions.** This level applies to first-time occurrences of inappropriate behaviour of comparatively lower severity. After formal investigation, if the complaint is substantiated, the initial response will focus on corrective measures such as a formal apology to the affected person(s), counselling, coaching, or other appropriate corrective action. Serious misconduct, even if it is a first occurrence, may be dealt with at a higher level depending on severity. The severity shall be determined by the relevant committee / authority based on the facts of the case.
- ii. **Level 2: Recurring socially inappropriate behaviour.** It can lead to suspension, subject to applicable law, standing orders / service rules and company policies, mandatory training on inclusivity / workplace conduct, formal apology towards affected parties, written admonition, potential transfer to another team, and even in serious cases, termination.
- iii. **Level 3: Major infraction,** including retaliation, or recurring socially inappropriate behaviour after a written admonition can lead to termination of employment. This level is not limited to cases involving prior written admonition and depends on severity and recurrence.
- iv. **Level 4: Serious cases, including any criminal offence.** This can lead to termination of employment, and the perpetrator may be reported to the police / authorities in accordance with applicable law and company procedures.

E. Confidentiality and Protection Against Retaliation

The Company shall, to the extent reasonably practicable and subject to applicable law, maintain confidentiality of complaints, inquiry / investigation proceedings, statements, records, findings and actions taken under this Policy. The Company prohibits retaliation, victimisation or adverse action against any person who raises a concern, files a complaint, participates in an inquiry / investigation, provides information, or assists in the implementation of this Policy in good faith. Any breach of confidentiality or retaliation may be treated as misconduct and may invite appropriate disciplinary action.

F. Training & Guidance

The Company will provide training and guidance on understanding, preventing, and dealing with discrimination and harassment to the HR Department, line managers and individual team members. Additional or specialised training may be provided to members of the IC and other designated personnel, as appropriate.