



HINDUSTAN ZINC

Anti-Harassment & Anti-Discrimination Policy

A. Objective:

Hindustan Zinc Limited aims to maintain a work environment in which people are treated with dignity and respect. We firmly believe that every individual within the organization has the right to work in an atmosphere that promotes equal employment opportunities. We strive to create an environment characterized by mutual trust and respect that enables employees to perform to their best potential in absence of intimidation, oppression, exploitation, discrimination or harassment of any kind. The Anti-Harassment policy of the company strictly prohibits all forms of harassment – sexual or non-sexual and expects professional behavior among employees at workplace which is free from bias, prejudice and discrimination. HZL shall make every reasonable effort including sensitization and training to create awareness on the policy.

B. Prohibited Conduct under the Policy:

The following (but not limited) are considered forms of harassment and will warrant investigation and appropriate action:

Sexual Harassment: The definition, scope and repercussion are decided by "Internal Complaints Committee" (ICC) as per the company's "Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace" (Link here)

Non-sexual harassment & Discrimination:

- Any form of discrimination towards an employee is strictly prohibited, including but not limited 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 of religious belief, life expectancy, or any other status protected by the laws or regulations in the locations where we operate.
- Bullying / Workplace Violence - 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.

Retaliation - Retaliation of any sort for filing a claim of harassment will not be tolerated. No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- ❖ Filing or responding to a complaint of discrimination or harassment.
- ❖ Appearing as a witness in the investigation of a complaint.
- ❖ Serving as an investigator of a complaint.

The policy should not be taken in a manner that disrupts the spirit of the purpose it was created. Any violation of the policy will be subjected to disciplinary action.

C Redressal Committee:

ICC or Internal Complaints committee will be empowered to deal with all kinds of harassment. The constitution of the committee will be same as previously decided for Sexual Harassment (Link here). The decision of the Committee shall be final and binding. It will be responsible for includes (but not exhaustive of):

- Making the complaint and any accused individual(s) aware of the gravity of misconduct
- Arrangement of immediate investigation of alleged misconduct
- Making recommendations for remediation to designated company officials
- Exploring informal means of resolving potential harassment
- Notifying appropriate authorities when criminal activities are alleged

D Confidentiality:

All complaints and investigations shall be treated confidentially. The IC Committee will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

E Escalations & Classification of Disciplinary Action:

All individual team members, managers, and leaders will be subject to disciplinary action, up to and including termination, for any act of harassment they commit. Although disciplinary action will be at the discretion of the Committee specific to each case after the investigation, it can generally be classified into 4 levels. The levels are as follows:

- ❖ **Level 1: First time occurrences of inappropriate behaviour.** An act out of character. After formal investigation, co-workers still feel comfortable working with the offender. The attempt will be to sensitize first and facilitate formal apology towards inflicted parties.
- ❖ **Level 2: Recurring socially inappropriate behaviour.** It can lead to suspension (Paid/Unpaid based on country), mandatory course on Inclusivity, formal apology towards inflicted parties, written admonition, potential transfer to another team and even has potential of termination.
- ❖ **Level 3: Major infraction,** including retaliation, or recurring socially inappropriate behaviour after a written admonition. Can lead to termination of employment.
- ❖ **Level 4: Serious cases, including any criminal offence.** Can lead to termination of employment and perpetrator will be reported to the Police/Authorities

F Training & Guidance:

Company will provide time to time training for understanding, preventing, and dealing with discrimination and sexual harassment.

G. Review of Policy:

The policy shall be reviewed on annual basis by the management.

Arun Misra

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CEO & Whole Time Director, HZL

Date: 05th June, 2025

