

SUZLON ENERGY LIMITED

POLICY AGAINST SEXUAL HARASSMENT AT THE WORKPLACE, SUZLON

1. Policy History

Date of Board approval	Particulars	Effective Date
12 th August 2016	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	12 th August 2016
5 th April 2024	Review and amendment of the Policy	5 th April 2024

2. Purpose of this Policy

- 2.1 Suzlon Energy Limited (“SEL” or the “Company”) is committed to providing an environment free of harassment at all its workplaces and to protect the dignity and respect of its employees. The Company follows a zero tolerance approach towards sexual harassment. The Company is committed to create a workplace with a safe environment and a more gender-inclusive space which is free from sexual harassment and discrimination.
- 2.2 The Policy is applicable to employees of all genders, gender identity and sexual orientation.

3. Scope and Applicability of this Policy

- 3.1 The Policy applies to the Company and all employees on the active rolls of the Company as well as to service providers and outsiders who may be within the territory of the Company at the time of the commission of the act. The Policy shall be deemed to be incorporated in the service conditions of all employees of the Company in India.
- 3.2 The Policy applies not only at all offices of the Company, its sites, factories, and manufacturing plants but also on off-campus official duty (workshops, field work, group holidays/excursions organized by the Company, interviews/meetings with outside people and any other activity organized by the Company outside the campus including the period of traveling for such activity).
- 3.3 In particular, the rules and procedures laid down in this policy shall be applicable to all the complaints of sexual harassment made by a person against any other person or an employee; in either case, irrespective of whether sexual harassment is alleged to have taken place within or outside the campus; by a service provider or an outsider against any employee if the sexual harassment is alleged to have taken place within or outside the campus; Permanent management, workmen, employees, temporary staff, trainees, and employees of service providers on contract at their workplace or at project sites; Sexual harassment at the workplace can take place with anyone belonging to any gender.
- 3.4 This Policy must be adopted by the Company’s subsidiaries subject to suitable modifications, if and to the extent required. The Policy keeps the guidelines framed by the Hon’ble Supreme Court judgment in the case of Vishakha & Others Vs. The State of Rajasthan (1997) in mind as also the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 which was published in Gazette of India on 22nd April

2013 and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 which was published in Gazette of India on 9th December 2013. However, the rules and procedures cover a wider spectrum of sexual harassment and deal with issues in consonance with the requirements of a manufacturing / turnkey provider company.

4. Definitions

Unless repugnant to the context:

- 4.1 “Act” shall mean the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013, and as amended from time to time.
- 4.2 “Applicable Laws” shall mean the Act and Rules made thereunder, the Companies Act, 2013, the Listing Regulations (as defined hereafter), and / or such other Act, Rules or Regulations, which are / may be applicable to the Company ensuring adequate diversity in its Board of Directors.
- 4.3 “Company” or “SEL” or “Suzlon” shall mean Suzlon Energy Limited.
- 4.4 “Complainant” shall mean any person who has been subject to Sexual Harassment and / or any person reporting an incident of Sexual Harassment. A third party can also be a Complainant.
- 4.5 “Board” or “Board of Directors” shall mean the Board of Directors of the Company.
- 4.6 “Employee” shall mean a person employed at a Workplace for any work on 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 on a voluntary basis 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.
- 4.7 “IC” or “Committee” shall mean the Internal Committee constituted in terms of Section 4 of the Act and this Policy.
- 4.8 “Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, together with the circulars issued thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force.
- 4.9 “Policy” or “this Policy” or “POSH” shall mean the Policy on Sexual Harassment at Workplace, Suzlon.
- 4.10 “Respondent” shall mean such person who is alleged / reported to have committed an act of Sexual Harassment.
- 4.11 “Rules” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 as modified from time to time and / or such other Rules as may be issued in terms of Section 29 of the Act.

4.12 “Sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed and includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
- Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
- Teasing, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will
- Demand or request for sexual favors
- Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes
- Giving gifts or leaving objects that are sexually suggestive
- Eve teasing, innuendos and taunts, physical confinement against one’s will or any such act likely to intrude upon one’s privacy;
- Persistent watching, following, contacting of a person; and
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- Any misbehaviour in the nature of Sexual Harassment on any social networking website shall also be considered Sexual Harassment at workplace irrespective of whether such sexual behaviour was shown during or outside of office hours

Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harrassment will also amount to sexual harrassment:

- implied or explicit promise of preferential treatment in employment; or
- implied or explicit threat of detrimental treatment in employment; or
- implied or explicit threat about the present or future employment status; or
- interference with work or creating an intimidating or offensive or hostile work environment for the Complainant; or
- humiliating treatment likely to affect the complainants’ health or safety.

4.13 “Workplace” shall mean and includes:

- all offices, premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by SEL including activities performed at any other site away from Company’s premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the Workplace or Workplace relations.
- Places visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.

4.14 Interpretation – In this Policy unless the contrary intention appears, words and expressions used and not defined in this Policy but defined in the Applicable Laws shall have the meanings respectively assigned to them in the Applicable Laws.

5. Review of the Policy and disclosure requirements

- 5.1 This Policy has been implemented w.e.f 12th August 2016 and has been subsequently amended w.e.f. 5th April 2024.
- 5.2 This Policy shall be disclosed on the website of the Company and a weblink shall be provided in the Annual Report.
- 5.3 This Policy has been framed in accordance with the Act and the Rules. Whilst the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions therein shall prevail.
- 5.4 If any aspect relating to sexual harassment is not explicitly covered in this Policy, then the provisions of Act and the Rules will apply. In the event of any inconsistency between the Policy and the Act, the provisions of Applicable law will prevail.
- 5.5 To the extent any change or amendment is required due to a change in the Applicable Laws, the proposed amendments shall be circulated to the IC at least 15 working days prior to the special meeting called for this purpose. An amendment shall be passed by two-thirds of the total members of IC.
- 5.6 Such amended Policy shall be placed before the Board for noting and necessary ratification.

6. Constitution of the IC

- 6.1 To prevent instances of Sexual Harassment and to receive and effectively deal with complaints pertaining to the same the IC has been constituted by the Company for all administrative units / offices of the Company. The details of the Committee has been notified to all covered persons at the Workplace.
- 6.2 The Committee comprises of the following members:
 - a. A Presiding Officer, who shall be a woman employed at a senior level at the Workplace from amongst employees (in case a senior level women employee is not available, the Presiding officer shall be nominated from the other offices or administrative units of the Workplace.
 - b. In the event that the other offices or administrative units of the Workplace do not have a senior level woman employee, the Presiding officer shall be nominated from any other Workplace of the same employer or other department or organization.
 - c. Two members from employees preferably committed to the cause of women or who have experience in social work or have legal knowledge.
 - d. An external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
 - e. One half of the total members shall be women.

6.3 The present constitution of the IC is as set out in Annexure A to this Policy.

7. Role and Mandate of IC

- 7.1 The IC is NOT to act as moral police; neither will it intrude on anyone's privacy. The role of the Committee is to create awareness about sexual harassment and to deal with and recommend punishment for non-consensual acts of sexual harassment, and not to curtail sexual expression within or outside the campus.
- 7.2 The members of the IC should be willing to help the Complainant and Respondent in exploring the possibility of a reconciliation. The members are expected to be sensitive to the issue and not let personal biases and prejudices (whether based on gender, caste, class) and stereotypes affect their functioning as members of the Committee.
- 7.3 Any case arising on issues of sexual harassment should be brought to the Committee and since issues connected to gender are sensitive the Committee will be approachable and not violate the confidentiality of the persons involved.
- 7.4 Once the Committee has been constituted, the Committee members will constitute the procedure to be adopted in terms of resolution of complaints. The Committee is required to meet at least twice a year; additional meetings could be held as necessary to deal with issues or complaints that may arise. If and when complaints arise the Committee should deliberate and seek resolution within a week and submit the recommendation to the Chairperson. The Committee is also responsible for arranging gender awareness programs such as workshops, panel discussions, lectures, interactive sessions, poster presentations etc. that will help create a sexual harassment free environment.
- 7.5 Any member of the Committee may request the Chairperson to call an emergency meeting. A notice of two working days shall be required for such a meeting to be called, including for calling upon a regular meeting. The quorum for all meetings shall be more than half of the existing members of the Committee. Motions shall be carried by a simple majority of those present and voting. The Minutes of all meetings shall be recorded, confirmed, and adopted.
- 7.6 Duty of IC to submit an annual report, which includes the number of cases filed / disposed of every calendar year to the employer and district office. The IC will function for a period of five years. The members of the new Committee will be elected according to the procedures outlined above at least two months before the end of the tenure of the existing Committee. The new Committee (including with the external member) has to be fully constituted at least one month before the end of the tenure of the existing Committee.
- 7.7 At the request of the complainant, the IC or the LC (as the case maybe) may recommend to the employer to provide interim measures such as:
- a. transfer of the Complainant or the Respondent to any other workplace;
 - b. granting leave to the Complainant up to a period of 3 months in addition to the regular statutory/contractual leave entitlement.
 - c. restrain the respondent from reporting on the work performance of the Complainant or writing the Complainant's confidential report.
- 7.8 The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,

- Warning
- Written apology from offender,
- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

8. Redressal

8.1 Guiding Principles

There will be provisions for punishment for the accused once there is a strong probability of the offence. However, during the pendency of the complaint and enquiry, there will also be attempts made at every step to treat the alleged accused as a human being susceptible to changing one's behavior on positive suggestions and social pressures. The Redressal shall involve supportive measures for the Complainant and protection against victimization. Filing of a grievance or complaint will not reflect upon/ adversely affect the Complainant's or accused or witnesses' status, future evaluation of grades, assignments, employment, promotion etc and to this end, it is advisable that they undergo periodic orientation and training.

8.2 Lodging a complaint

- a. If a person experiences any form of sexual harassment at the Workplace, they should first recognize it as such. Sexual harassment can include unwelcome advances, comments, gestures, or any behavior that creates an uncomfortable or hostile environment. The aggrieved person / Complainant can complain to the IC members in writing or via email to ethicshelpline@suzlon.com or InternalComplaint@suzlon.com within 3 months of the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. The Complainant should document the details of the harassment, including the date, time, location, individuals involved, and any witnesses.
- b. Where the Complainant is unable to make a complaint on account of his /her physical or mental incapacity or death or otherwise, the complaint shall be made by such person as prescribed under the Rules.
- c. Where a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the Complainant for making the complaint in writing.
- d. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.
- e. Upon receiving the complaint, the IC will acknowledge its receipt promptly and IC will conduct an initial assessment of the complaint to determine its prima facie validity.
- f. If the complaint is deemed valid, the Respondent (the alleged harasser) will be informed about the complaint against them. They will also be given an opportunity to respond to the allegations.
- g. The IC, may, before initiating an inquiry and at the request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation as

per the provisions of the Act, provided that no monetary settlement shall be made as a basis of conciliation.

- h. Where the conciliation is unsuccessful, an inquiry process will be initiated and this may involve gathering evidence, interviewing witnesses, and speaking with both the Complainant and the Respondent. The processess will be impartial and unbiased.
- i. After this the IC will compile a report detailing its findings and recommendations. If harassment is confirmed, appropriate action will be taken against the Respondent as per the organization's policy and relevant laws.
- j. A copy of the full enquiry report along with all the annexures of the complaint post completion of investigation process shall be made available by the Internal Committee to the Board of Directors. Also, a copy of the report shall be provided to the Complainant and the Respondent respectively and it must be ensured that the identity of the witnesses is kept strictly confidential.
- k. The Committees should be mindful of the timelines and operate within realistic and reasonable time frames for resolution of Complaints, depending upon the magnitude of seriousness. In any case, the Committees should initiate action expeditiously on Complaints received and should complete the inquiry process within a period of three months (90 days).
- l. The Complainant will be informed about the outcome of the investigation and any actions taken. If the Complainant is not satisfied with the resolution, they may have the option to appeal the decision of the Internal Committee. To ensure a safe and respectful Workplace where employees feel empowered to report harassment without fear of retaliation, the complaint process will be clearly communicated to all employees and support will be provided to complainants throughout the process.

8.3 Punishments and Penalties

The penalties listed below (in ascending order) are indicative, and shall not constrain the employer /management from considering others, in accordance with the rules governing the conduct of employees and service providers in practice at the time.

- Warning, reprimand, or censure.
- Withholding of one or more increments for a period not exceeding one year.
- Removal from an administrative position at the IC.
- Disbarment from holding an administrative position at the IC
- Suspension from service for a limited period.
- Compulsory retirement.
- Dismissal from service.

Further, the penalty awarded shall be recorded in his/her Confidential Record. The right to an official character certificate may also be withdrawn where applicable. In addition to the penalties specified, the person may be advised to undergo counselling and gender sensitization, and to give a written apology to the Complainant.

8.4 Penalty in case of a Second Offence

A second, or repeated offence, may, on the recommendation of IC, attract a higher penalty.

8.5 Confidentiality

The Minutes of the Meeting of the Internal Committee, the findings, recommendations, decisions of the Committee and any document or any verbal communication shall be kept strictly confidential, and the members shall not divulge the details to any other employee within the Company or to any person outside the Company. The Complainant's identity will be revealed only to those directly involved in the investigation and a strict confidentiality shall be maintained throughout the process to protect the privacy and reputation of both the Complainant and the Respondent. Also, to other employees involved in such discussions, the members should emphasise the necessity for maintaining confidentiality and the consequences of possible disciplinary action in case of transgression.

9. Obligations of the Company

9.1 Suzlon Management shall:

- Provide a safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace and
- Display at any conspicuous place at the Workplace, the penal consequences of sexual harassment and the order constituting the IC.
- Organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the IC. The training for IC Members should address the procedures of investigations, skills necessary for enquiries and documenting the procedures. Furthermore, the IC member must provide necessary facilities to the IC to organise meetings, deal with the complaint and conduct the inquiry and provide assistance to the individual to file a complaint under IPC.
- Treat sexual harassment as misconduct under the service rules and initiate action against misconduct.
- Empower the IC to monitor its own functioning and ensure that it is in conformity with the due process of law. This includes reviewing the progress of cases, ensuring adherence to timelines, and addressing any issues that may arise during the complaint resolution process.

10. Gender Sensitization

- 10.1 The role of the IC will also be to sensitize employees regarding gender differences, including raising awareness about issues of gender and sexuality and working towards creating an enabling environment of gender justice where all employees can work together with a sense of personal security and dignity.
- 10.2 The following is a list of methods in which awareness and sensitization of employees, staff of service providers and any third party visiting the campus will be conducted:
 - a. An orientation seminar will be organized to discuss the nature and scope of the Act annually, along with other seminars, performances, and discussion forums, where gender sensitization and gender awareness will be the focus. These will happen during the calendar year.
 - b. Spreading awareness of the policy and implementation of the same through informal sessions, performances, cultural events, etc., about the policy being implemented by Suzlon.

- c. Ensure capacity and skill building of Internal Committee and widely publicize names and contact details of Internal Committees members.
- 10.3 Suzlon is dedicated to creating a Workplace free from Sexual Harassment, promoting sustainability, and fostering gender neutrality. We encourage all employees to report any incidents promptly, and we pledge to ensure a fair and respectful redressal process.

11. Reporting Requirements:

- 11.1 A report containing number of complaints received under this Policy and their outcome shall be placed before the Audit Committee on a quarterly basis.
- 11.2 In terms of the Act, the Internal Committee, shall in each calendar year prepare, in such form as may be prescribed, an annual report and submit the same to the appropriate authority on or before 31st January every year for the preceding calendar year.

Annexure – A
Details of Internal Complaints Committee

Internal Complaint Committee Members of Suzlon		
Name	Email ID	Mobile Nos.
Dharini Mishra (Chairperson)	dharini.mishra@suzlon.com	8668699805
Jasmine Gogia (Chairperson)	jasmine.gogia@suzlon.com	9763716672
Sakshi Shaha (Member)	sakshi.shaha@suzlon.com	9545861610
Santosh Mishra (Member)	santosh.mishra@suzlon.com	9767891279
Kavita Dasan (Member)	kavita.dasan@suzlon.com	9899000977
Subrata Basa (Member)	subrata.basa@suzlon.com	7030935784
Rakesh B. Shukla (Member)	rshukla@suzlon.com	9822659847
Rama Sarode, (Member – External Lawyer)	ramasarode@gmail.com	9822532137