

Policy on Prevention of Sexual Harassment

*OLA Electric Mobility Limited, its subsidiaries & affiliates

Version	Action	Policy Owner	Approval Authority	Action Date
2.00	Updation of IC members			11-Dec-2024

A. Introduction

OLA Electric Mobility Private limited & its subsidiaries has an equal employment opportunity company and is committed to creating a healthy and safe working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

B. Purpose:

In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") the Company has provided a framework to specifically handle acts of sexual harassment at the workplace. This policy is intended to be gender neutral and will apply uniformly in case of sexual harassment of any person, irrespective of the gender of the parties.

C. Scope:

This policy is applicable to all employees of the Company, which for the purpose of this policy shall include all employees, probationers, trainees, apprentices and also contract workers, vendors, consultants working on the Company's premises. In the event of a sexual harassment allegation against a contract worker, the Company will work with the employer of the alleged offender to decide how the matter should be handled.

This policy is applicable not only on Company's premises, but also in situations where persons covered by this policy have opportunities to interact on a work-related basis such as while travelling, in off-site events or other third party premises. Any form of sexual harassment engaged in by the Company's employees, clients, vendors, or other business associates in the Company's premises or during the course of the employee's employment for the Company, shall not be tolerated.

D. What is Sexual Harassment:

Sexual harassment may be one or more incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature (whether directly or by implication). Sexual harassment in the workplace includes:

1. Physical contact and advances; or
2. A demand or request for sexual favours; or
3. Making sexually colored remarks, jokes, letters, phone calls, e-mails, gestures, lurid stares, physical contact, molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects the individual's performance; or
4. Showing pornography; or
5. any other unwelcome physical, verbal or non-verbal conduct of sexual nature; or
6. eve teasing, making sexual innuendos, taunts, physical confinement against one's will and any act which is likely to intrude upon one's privacy;

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

1. Implied or explicit promise of preferential treatment in employment; or
2. Implied or explicit threat of detrimental treatment in employment; or
3. Implied or explicit threat about present or future employment status; or
4. Interference with work or creating intimidating or offensive or hostile working environment; or
5. Humiliating treatment likely to affect health or safety.

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment in the workplace is prohibited whether it involves co-worker harassment, harassment by a manager, applicants for employment, contract workers, contractors, customers, vendors or any person doing business with or for the Company.

E. What is a Workplace

“Workplace” shall mean all places where Company’s work is carried out. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually. For example:

- a. All offices or other premises where Company’s business is conducted
- b. All Company related activities performed at any physical or virtual site
- c. Any social, business or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations
- d. Any alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, , on any social media platform or through any other electronic communication etc.
- e. Any sexual harassment on any social networking website during or outside of office hours
- f. Any place visited by Employee or arising out of or during the course of employment with Company, including transport services provided by Company for undertaking such journey, audio/video conferencing applications or any other communication related tools/applications. For example, Employees who are on overseas programs and trainings in course of their employment with the Company.

F. Who is an Employee

“Employee” means 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.

G. Who is a Visitor / Third Party

“Visitor” or “Third Party” includes any person who is visiting the Workplace and is not covered by any of the other categories defined by this Policy. For example, guests coming for physical/online interviews, meetings,

events, programs or people walking in for meeting existing Employees, etc.

H. Internal Committee

The Company has constituted committees across its offices for redressal of sexual harassment complaints and for ensuring time bound treatment of such complaints (IC or Internal Committee)

At all times, the IC shall comprise of the following:

A senior level woman Employee shall be appointed as Presiding Officer of the IC ("Presiding Officer"). The Presiding Officer shall automatically vacate her office upon ceasing to be Employee of Company.

Minimum two (2) members of the IC will be appointed from amongst Employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field. These members shall automatically vacate office upon ceasing to be Employee of Company.

Minimum one (1) member from amongst non-governmental Organisations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment. This member shall vacate office upon termination of contract with Company.

At least one-half of the total members nominated to the IC shall be women.

The names and other details of the members of the Internal Committee for each office are set out in Annexure 1.

An IC member shall be removed / replaced in the event that the IC member:

1. breaches confidentiality
2. has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against them
3. has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against them
4. has abused their position as to render their continuance in office prejudicial to the public interest
5. Any vacancy created in the IC due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by Company in accordance with its guidelines and in conjunction with provision of Law (where applicable).

The Internal Committee is responsible for inquiring into every formal written complaint of sexual harassment and making recommendations to the Company on the actions to be initiated against the respondent.

I. Complaints

Any person who feels and is being sexually harassed directly or indirectly at the workplace ("Aggrieved Person") may submit a complaint by writing to the Internal Committee's email IDs - safeworkplace@olaelectric.com based on the person's location or to any member of the Internal Committee individually (details set out in Annexure 1) within 3 (three) months from the date of occurrence of the alleged

incident and in case of series of incidents, within a period of 3 (three) months from the date of the last incident. The Internal Committee may extend the 3 (three) month period, if it is satisfied that the circumstances were such which prevented the complainant from filing of the complaint within the period of 3 (three) months.

The Aggrieved Person would be required to disclose their name and contact details, and where the complainant is an employee, the department where the employee is working in, to enable the Internal Committee to contact the complainant and take the matter forward.

Along with the complaint, supporting documents, names and contact details of witnesses must also be submitted.

If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person by:

1. their relative or friend; or
2. their co-worker; or
3. an officer of the National Commission for Women or State Women's Commission; (in case the complainant is a woman) or
4. any person who has knowledge of the incident

If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

1. their relative or friend; or
2. a special educator; or
3. a qualified psychiatrist or psychologist; or
4. the guardian or authority under whose care they are receiving treatment or care; or
5. any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

Any of the persons referred to above, who may file a complaint on behalf of the Aggrieved Person shall be referred to as the "Complainant." Any reference to the term 'Complainant' throughout this Policy shall mean reference to 'Aggrieved Person' and / or the 'Complainant' as applicable.

J. Processing the complaint

1. The Internal Committee will hold a meeting with the complainant as soon as possible .
2. The Internal Committee shall normally forward a copy of the complaint to the respondent, within 10 (Ten) working days of receipt of the complaint, or within such time-period as it may deem reasonable, and give her/him.
3. An opportunity to give a written explanation if she/he so desires is provided
4. The respondent shall file their reply to the complaint along with their list of documents and names and addresses of witnesses within a period of 7 (Seven) working days from the date of receipt of the complaint from the Internal Committee or such other period that the Internal Committee may specify.
5. In the event, the complaint does not fall under the purview of sexual harassment or the complaint does not

mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof or forwarded to the Human Resources Department as necessary.

K. Complaint Against a Third Party

If any Employee/Third Party is sexually harassed by any external party who is not an Employee of the Company, either in Company premises or in that external party's premises, then IC shall contact either the internal committee of that external party and / or the Police (as the case may be), on the written complaint of such Employee/Third Party to the Company's IC and on their request that such complaint be transferred to other IC and address the matter to satisfactory closure. Alternatively, Employee/Third Party may choose to reach out directly to IC of that external party and / or Police (as the case may be)

REPORTING



L. Conciliation

1. Before initiating an inquiry, the Internal Committee may, at the request of the complainant, take steps to settle the matter between the complainant and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.
2. Once the settlement is concluded, the Internal Committee shall record the settlement and forward the same to the Company to implement the terms of the settlement where required.
3. Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.

M. Inquiry Process

1. Where any term or condition of the settlement agreement arrived has not been complied with by the respondent, or if the complainant does not request for conciliation, or if the conciliation process fails, and where the respondent is an employee, the Internal Committee shall initiate the inquiry process in accordance with the provisions of this policy. The Internal Committee shall communicate the same to the complainant and the respondent.
2. If the complainant or the respondent desires any witness/es to be summoned, they shall communicate the same in writing to the Internal Committee, along with the names of such witness/es whom they propose to call.
3. If the complainant desires to tender any documents by way of evidence before the Internal Committee, she / he shall, as far as possible, submit original copies of such documents. Similarly, if the respondent desires to tender any documents in evidence before the Internal Committee, she / he shall supply original copies of such documents. Both shall affix her / his signature on the respective documents to certify these to be original copies.
4. The Internal Committee shall call upon all witnesses mentioned by both the parties and such witnesses that the Internal Committee may deem appropriate, and provide a reasonable opportunity of being heard to both the respondent and the complainant.
5. The Internal Committee shall provide every reasonable opportunity to the Complainant and to the respondent, for putting forward and defending their respective case.
6. Quorum for the inquiry proceedings shall be any 3 (three) members of the Internal Committee including the Presiding officer and External Member.
7. Both the respondent and the complainant (unless specifically exempted by the Internal Committee in writing) shall be required to attend every hearing. If either party fails to attend 3 (three) consecutive hearings without sufficient case, the Internal Committee may terminate the inquiry or pass an ex parte order with 15 (fifteen days') notice.
8. The Internal Committee shall complete the inquiry within a reasonable period of time but not beyond 3 (three) months and communicate its findings and its recommendations to the Head of HR Operations for action to be taken by the Company.
9. The Head of HR will direct appropriate action in accordance with the recommendation proposed by the Internal Committee.

N. Interim Relief

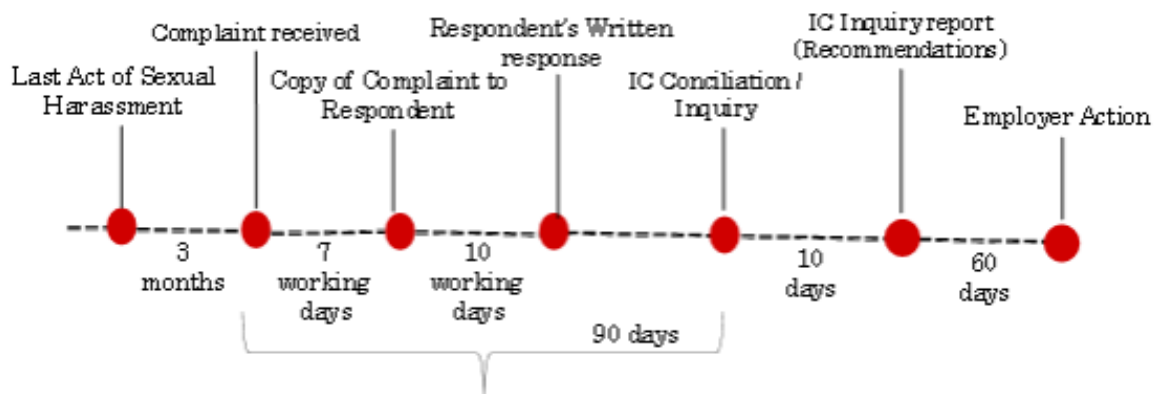
During the pendency of the inquiry, on a written request made by the complainant, the Internal Committee

may recommend the Company to:

1. Transfer the complainant to another office/department/division as deemed appropriate, or
2. Transfer the respondent to another office/department/division as deemed appropriate, or
3. Grant leave to the complainant up to a period of three months, or
4. Restrain the respondent from reporting on the work performance of the complainant or writing the complainant's appraisal/confidential report(s).
5. Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, , video/audio calls, on any social media platform or via any other mode of electronic communication.
6. The Internal Committee may also recommend the Company to suspend the respondent or grant leave to the respondent, during the pendency of the inquiry if the circumstances so merit.

In case Respondent is a Visitor / Third Party, any one or more of the following may be recommended: If the Respondent is a Visitor / Third Party adequate steps to ensure that they do not enter Company premises or contact/threaten Complainant/Witnesses directly or indirectly using any mode of communication. IC to suggest appropriate disciplinary action by the concerned authority including reaching out to the Police if required with consent of Complainant.

TIMELINES



O. Internal Committee's recommendations

1. During the inquiry proceeding, if the respondent is found guilty of sexual harassment, depending on the severity of the offence, the Internal Committee may make any of the following recommendations to the Head of HR Operations which may include, and not be limited to
 - i. transfer of the respondent;
 - ii. direct the respondent to undergo training or counselling to address any specific issues;
 - iii. direct the respondent to provide a written apology to the complainant clearly indicating that such behavior will not be repeated and that no retaliatory steps will be taken by them or others on their behalf against the complainant;
 - iv. give a verbal or written warning which will also be noted in the respondents employment record;
 - v. withhold increment or bonus (whether in full or part);
 - vi. withhold promotion;
 - vii. direct termination or suspension of employment of the respondent;
 - viii. any of the other appropriate disciplinary action.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. If the complainant desires to take criminal action against the respondent, there shall be no objection by the Internal Committee and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the complainant.

Where the Respondent is a Third Party, IC may recommend any one or more of the following:

- Warning to employing Company/association/firm (if any)
- Declaring the Workplace/Company out of bounds to the Respondent
- Withdrawal of the right to provide services to Company for a certain period (if applicable)
- Helping the Complainant in filing an FIR, should they desire
- Debarring/blacklisting such person from Company
- Other similar or appropriate punishment

P. Consequences of false or malicious complaints and false evidence

Where the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious or the complainant has made the complaint knowing it to be false or the complainant has produced any forged or misleading document, it may recommend the Company to take action against the complainant. The Internal Committee may also recommend to the Company to take appropriate disciplinary action if it is found that any witness or respondent has given false evidence or produced any forged or misleading document.

Q. Confidentiality

The Company understands that it is difficult for the complainant to come forward with a complaint of sexual

harassment and recognizes the complainant's interest in keeping the matter confidential.

The Internal Committee, the company, the complainant, the respondents, the witnesses and others who may assist in the inquiry proceedings shall be bound to keep information relating to the inquiry, confidential. Any employee who is found to have breached the confidentiality of the inquiry process, would be liable for disciplinary action up to and including termination.

All records of sexual harassment complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company, except where disclosure is required under disciplinary or other remedial processes.

R. Procedure for Filing an Appeal

In case the inquiry process is conducted by the IC and the Complainant is woman, either party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations may file an appeal to the Appellate Authority as per service rules and/or as per other provisions of Law within 90 (ninety) days of the recommendations.

By way of this Policy, as a healthy practice and as part of internal policies, in case the Complainant is of any other gender, either party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations can get in touch with [], who will review the appeal.

S. Retaliation

The Company prohibits any form of retaliation against anyone who has raised a complaint of sexual harassment or has cooperated in any inquiry involving a complaint of sexual harassment. Any individual who believes that she/he is experiencing retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report this to the Internal Committee or HR, and the Company will then address the concerns raised. Any person who is found to be guilty of retaliation may be subject to appropriate disciplinary action including dismissal from service. Anyone who abuses this procedure would also be subject to disciplinary action including dismissal from service.

T. Consensual Sexual Relationships at workplace

Should there be any kind of romantic or sexual relationships amongst employees, such relationships could sometime lead to conflicts of interest at work. Hence, in the best interest of all concerned, if any of such relationships, particularly between a member of management or in any other supervisory role and her or his staff (an employee who reports directly or indirectly to that person); the involved parties should notify management of the Company and write to disclosure@olaelectric.com so that the reporting chain can be altered to ensure that no direct or indirect reporting relationship continues.

U. Filing of Complaint with the Police

Nothing in these rules and procedures shall preclude anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under the law. Company will provide assistance in this regard, if assistance is sought. This Policy is not intended to impair or limit the right of any Employee seeking a

remedy available under any law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a Complainant (as defined hereinafter) against Respondent under any law in force.

V. Amendments

Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to sexual harassment at workplace. This Policy shall be reviewed bi-annually or as and when key issues get raised to incorporate amendments.

This Policy does not intend to create any contractual obligation for or with Company, and in case of dispute with the Law and the Policy, the Law shall prevail.

ANNEXURE 1

OEM & its Subsidiaries - Internal Committee

OEM Corporate Office - IC		
Name	Role	Designation
Marisha Shukla	Presiding officer	Director Legal
Nazim Mohammed	IC member	Director - Legal
Amitava Ghosh	IC member	Consultant
Diya Bhat	IC member	Manager - SDE 3 (Android)
Hemavathi T	IC member	Manager - HRBP
Rohini Rao	IC member	Associate Director - Power Electronics LV
Thilaga P	IC member	External Member POSH
Samriti Makkar Midha	IC member	External Member POSH
Sana Hakim	IC member	External Member POSH

Battery Innovation Centre - IC		
Name	Role	Designation
Neelakshi Sharma	Presiding Officer	Senior Manager, Principal Research Engineer
Mohammed Nazar	IC member	Associate Director, Cell Engineering
Manisha	IC member	Senior Manager
Thilaga P	IC member	External Member POSH
Samriti Makkar Midha	IC member	External Member POSH
Sana Hakim	IC member	External Member POSH

OEM Future Factory - IC		
Name	Role	Designation
Sheela Mary	Presiding officer	Manager - ER
Dr. Bharathi Priya	IC member	Factory Medical Officer
Nisha S	IC member	Manager - ER
Rega Mathiyazhagan	IC member	Manager – Battery Operations
Navin Prasad G	IC memeber	Associate Director – Assembly Operations

Ramani R	IC member	Associate Director - PPC & Material Management
Thilaga P	IC member	External Member POSH
Samriti Makkar Midha	IC member	External Member POSH
Sana Hakim	IC member	External Member POSH

OEM Giga Factory - IC		
Name	Position	Designation
Manju Priya	Presiding officer	ER HR
Dr. Keerthika	IC member	Doctor, EHS
Saravanan	IC member	Assembly
Shivam Pateriya	IC member	Quality
Mohammad Ifthekar Khan	IC member	Maintenance
Thilaga P	IC member	External Member POSH
Samriti Makkar Midha	IC member	External Member POSH
Sana Hakim	IC member	External Member POSH

ANNEXURE 2

Flowchart for the Investigation Process & Timeline under
Formal Redressal Process

