

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY
OLA Electric Mobility Limited

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.

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.

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.

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.

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 (Internal Committee). The names and other details of the members of the Internal Committee for each office are set out in Annexure 1. Whenever it may be necessary or appropriate, the

Company shall have the right and discretion to remove or replace any member of the Internal Committees.

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

Complaints:

1. Any person who feels and is being sexually harassed directly or indirectly at the workplace 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.
2. The complainant would be required to disclose her/his 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.
3. Along with the complaint, supporting documents, names and contact details of witnesses must also be submitted.
4. In special circumstances, where the complainant is unable to make the complaint, the Internal Committee may allow an authorized person to make the complaint in accordance with the Act.

Processing the complaint:

1. The Internal Committee will hold a meeting with the complainant within 5 (five) days of the receipt of the complaint or within such time-period as it may deem reasonable .
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 her/his reply to the complaint along with her/his 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.

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.

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 the presiding officer and any 2 members of the Internal Committee
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 cause, 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 Operations will direct appropriate action in accordance with the recommendation proposed by the Internal Committee.

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).

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.

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
 - transfer of the respondent;
 - direct the respondent to undergo training or counselling to address any specific issues;
 - 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 her/him or others on her/his behalf against the complainant;
 - give a verbal or written warning which will also be noted in the respondents employment record;
 - withhold increment or bonus (whether in full or part);
 - withhold promotion;
 - direct termination or suspension of employment of the respondent;
 - 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.

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.

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.

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.

ANNEXURE 1: OEM & its Subsidiaries - Internal Committee

Internal Committee Members - Gigafactory					
S.No.	Name	Gender	Department	Email ID	Position
1	Manjupriya S	Female	Human Resources	manjupriya.s@olaelectric.com	Presiding Officer
2	Keerthika D R	Female	EHSS	keerthika.r1@olaelectric.com	IC Member
3	Saravanan Desigachari	Male	Cell - Manufacturing	saravanan.desigac@olaelectric.com	IC Member
4	Shivam Pateriya	Male	QMS	shivam.pateriya@olaelectric.com	IC Member
5	Silambarasan Loganathan	Male	Utilities & Maintenance	silambarasan.l@olaelectric.com	IC Member
6	Samriti Makkar Midha	Female	External Member POSH	samriti.midha@equilibrioadvisory.org	IC Member
7	Sana Hakim	Female	External Member POSH	sana.hakim@equilibrioadvisory.org	IC Member
9	Prerna Murarka	Female	External Member POSH	prerna.m@equilibrioadvisory.org	IC member

Internal Committee Members - Futurefactory					
S.No.	Name	Gender	Department	Email ID	Position
1	Sheela Mary E L	Female	HR	sheela.l@olaelectric.com	Presiding Officer
2	Dr. Bharathi Priya K S	Female	EHSS	bharathipriya.k@olaelectric.com	IC member
3	Rega Mathiyazhagan	Female	Battery Shop	rega.m@olaelectric.com	IC member
4	Navin Prasad G	Male	General Assembly	navinprasad.g@olaelectric.com	IC member
5	Baskar N	Male	Manufacturing Quality Assurance	baskar.n1@olaelectric.com	IC member
6	Dheebika M	Female	Motor Shop	dheebika.m@olaelectric.com	IC member
7	Samriti Makkar Midha	Female	External Member POSH	samriti.midha@equilibrioadvisory.org	IC member
8	Sana Hakim	Female	External Member POSH	sana.hakim@equilibrioadvisory.org	IC member
9	Prerna Murarka	Female	External Member POSH	prerna.m@equilibrioadvisory.org	IC member

Internal Committee Members - BIC					
S.No.	Name	Gender	Department	Email ID	Position
1	Neelakshi Sharma	Female	Cell R&D	neelakshi.sharma@olaelectric.com	Presiding Officer
2	Mohammed Nazar	Male	Cell R&D	mohammed.nazar@olaelectric.com	IC member
3	Swati Goyal	Female	HR	swati.goyal@olaelectric.com	IC member
4	Samriti Makkar Midha	Female	External Member POSH	samriti.midha@equilibrioadvisory.org	IC member
5	Sana Hakim	Female	External Member POSH	sana.hakim@equilibrioadvisory.org	IC member
9	Perna Murarka	Female	External Member POSH	perna.m@equilibrioadvisory.org	IC member

Internal Committee Members - Corp OEM					
S.No.	Name	Gender	Department	Email ID	Position
1	Rohini Rao	Female	Vehicle Engineering	rohini.rao@olaelectric.com	Presiding Officer
2	Nazim Mohammed	Male	Legal	nazim.mohammed@olaelectric.com	IC member
3	Amitava Ghosh	Male	Compliance	amitava.ghosh@olacabs.com	IC member
4	Diya Bhat	Female	Software and Product	diya.bhat@olaelectric.com	IC member
5	Krutesh Desai	Male	Human Resources	krutesh.desai@olaelectric.com	IC member
6	Sonam Nandhwar	Female	Human Resources	sonam.nandanwar@olaelectric.com	IC member
7	Samriti Makkar Midha	Female	External Member POSH	samriti.midha@equilibrioadvisory.org	IC member
8	Sana Hakim	Female	External Member POSH	sana.hakim@equilibrioadvisory.org	IC member
9	Perna Murarka	Female	External Member POSH	perna.m@equilibrioadvisory.org	IC member