



Swan Energy Limited

Diversity, Anti-Discrimination & Equal
Opportunities Policy

OBJECTIVE

Swan believes in promoting diversity & inclusion as a culture which allows all employees to bring their authentic selves to work and contribute wholly with their skills, experience and perspective for creating unmatched value for all stakeholders.

The Company has articulated its employee promise or Cornerstones as Fairness & Meritocracy, Learning & Growth and providing a Supportive environment. The essence of Fairness & Meritocracy is about providing a rule based policy framework that is nondiscriminatory and provides equal opportunity for all individuals irrespective of their gender, religion, caste, race, age, community or physical ability. Swan endeavors to ensure a safe, secure and congenial work environment, so that employees can deliver their best without inhibition. The Company has put in place a robust Grievance Redressal process for investigation of employee concerns and has instituted a Code of Conduct & Employee Service Rules that clearly delineates employee responsibilities and acceptable employee conduct. Together, these constitute the foundation for promoting a diverse and inclusive culture at the workplace.

SCOPE AND APPLICATION

This policy applies to every employee of Swan Energy Limited ("Swan", "Company") and its subsidiary companies.

Explanation: "employees" includes employees, Management Trainees, Management Associates, but excludes Summer Trainees, Casual/Temporary employees, employees of contractors/ vendors/partner and such other classes of persons who work on a job or work contract and who are not on direct employment with the Company.

POLICY STATEMENT AND REQUIREMENTS

Our Commitment

Our employee promise or cornerstones of Fairness and Meritocracy, Supportive Environment and Learning and Growth opportunities are reflected in the Human Resources policies and practices and operationalized through the Code of Conduct and other policies such as Anti Sexual Harassment Policy. The Company believes that senior leaders need to champion a gender neutral, equal opportunity workplace and holds them accountable for promoting a safe and inclusive work environment that adheres to the following norms as below:

- a) A workplace which is free from discrimination, harassment, bullying, victimization;
- b) Equal employment opportunities and career progression based on principles of fairness and meritocracy;
- c) Respectful communication between all employees regardless of title or level;
- d) Supportive and flexible policies and employment contracts that accommodate the life stage needs of individuals;
- e) An environment where employees feel that their background and lifestyle do not affect perceptions of them as a professional, or affect their opportunities for development. We encourage our employees to work together and conduct themselves in a professional manner;
- f) Treating employees fairly and respecting their dignity, privacy, personal rights;

- g) People with disabilities have equal access to opportunities. The Company values their contribution and to ensure they are not discriminated the Company will
- Take forward reasonable accommodation to ensure a disability friendly accessible workplace; Reasonable accommodation includes workplace modification, specialized equipment/software, flexibility in other benefits/privileges to perform job functions effectively without posing any significant hardship to the Company/ other colleagues;
 - Sensitize managers, team members and relevant personnel on acceptable communication and engagement norms;
 - Provide relevant support to help them succeed

Employee responsibilities

Employees at all levels have an obligation to implement this Policy in their day-to-day work and their dealings with colleagues and customers. It is the responsibility of each manager to address promptly any questions or concerns about diversity or equal treatment and, if necessary, to refer them to the Human Resources Department for additional assistance.

The Company will regularly monitor all relevant diversity and inclusion metrics to suggest appropriate actions.

Employee Practices

We employ people based on the role requirements, and select candidates based on relevant qualifications, skill and experience required for successful discharge of the role. Our employee policies, programs and practices of recruitment, development, rewards, and advancement are aligned to promote equal opportunity based on principles of meritocracy and fairness and not discriminate on grounds of gender, religion, caste, race, age, community, physical ability or gender orientation. The Company has a well-defined policy framework to accommodate needs of employees based on their life stage needs and personal exigencies.

In support of the policy, the Company expressly prohibits any form of discrimination, harassment or bullying. Employees are encouraged to raise any grievance to their manager, HR manager.

GLOSSARY

Diversity

Refers to a commitment to recognize and appreciate the variety of characteristics that make the individuals unique in an atmosphere that embraces and celebrates individual and collective achievement. Identity is dependent on much more than one dimension of a person's background. In recognizing and appreciating the many characteristics that make individuals unique, diversity provides solutions to eliminate discrimination in the workplace.

Inclusion

The act of including; a strategy to leverage diversity. Diversity always exists in social systems. Inclusion, on the other hand, must be created. In order to leverage diversity, an environment must be created where people feel supported, listened to and able to do their personal best.

Harassment

Harassment is unwelcome and uninvited conduct which offends, humiliates or intimidates another person. The conduct does not have to be intentionally designed to harass a person for it to be considered harassment. Conduct may also amount to harassment even if it was not specifically directed at a particular person.

Harassment can be verbal, physical or visual and can be based on a range of grounds such as a person's gender, family status, race or national origin, nationality, disability or any other personal characteristic.

Bullying

Bullying is intimidation on a regular and persistent basis, or conduct which undermines the competence, effectiveness, confidence or integrity of a person. Examples of bullying include: shouting and swearing at other employee(s) either in public or in private, abusive language, public humiliation, personal insults or deliberately setting unrealistic targets.

Victimization

Victimization may occur when a manager or colleague treats a person less favorably than he/she would treat other people because he/she has complained of harassment or discrimination.