



## 1. Introduction & Objective

- 1.1 The Company is committed to respect the human rights of its workforce, communities and those affected by its operations, wherever it does its business, including its business partners, supply chain and contractors. Therefore, in the management of its businesses and operations, the Company strives to uphold the spirit of human rights, as enshrined in the Constitution of India, existing international standards such as the United Nations Global Compact Convention, the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights etc.
- **1.2** This policy is intended to express the Company's commitment to carry out the business with ethical values and embrace practices that support human rights in every geography, wherever it operates.

### 2. Objective and Scope

This Policy applies to Fiem Industries Limited and its subsidiaries, across all locations.

This Policy shall cover all Employees of the Company and its subsidiaries and consultants as retainer, workers engaged by contractors etc. (associated persons).

This Policy should be read in conjunction with following policy documents of the Company:

- FIEM Code of Conduct
- Whistle Blower Policy / Vigil Mechanism

Company will communicate the Policy to its Employees and will publish on its website. Every employee is bound to comply with this Policy.

### 3. Human Rights: Principles

It is the Company's commitment that across its operations, human rights are protected and all requisite measures and practices to be adhered and an overall facilitation and encouragement to be provided to adhere the following principles:

## 3.1 Equal Opportunity, Non-Discrimination, Diversity and Inclusion

Company shall not cause or permit any forms of discrimination, including but not limited to discrimination on the basis of race, descent, disability, age, sex and religion.

The Company endeavours that the work environment across its operations remain free from discrimination in every form. The Company prohibits discrimination in the matter of compensation, training, opportunities and employee benefits on the basis of caste, creed, religion, language, ethnicity, disability, age, gender, sexual orientation, race, colour, marital status or union organization or any other status protected by appropriate laws.

The Company encourages an inclusive work environment, wherein diversity is valued and equal opportunities are available to all the employees and stakeholders.



The Company follows applicable laws and regulations in the matter of deciding wages/salaries, hours of work and welfare measures.

## 3.2 <u>Prohibition of Child Labour and Forced Labour</u>

The Company has zero tolerance towards and prohibits engagement of Child Labour and Forced Labour and any form of human trafficking. The Company is committed to ensure that no instance of Child or Forced Labour occurs in any of its operations and establishments. The Company prohibits associated vendors, contractors and suppliers from engaging child and/or forced labour.

Accordingly, Company is committed that:

- (a) It shall not cause or permit any child below the minimum age (18 years) for employment to engage in labour or work;
- (b) It shall not cause or permit forced labour (i.e., coercing labourers to work against their free will and choice by means of violence, intimidation, confinement or other measures that cause unjust physical or mental restraints).

### 3.3 Freedom of Expression and Association

Company respect freedom of association, including trade unions and recognizes and respects the right of its employees to exercise freedom of association in matters related to their employment, as per policies and procedures of the Company, without them having any apprehension. The Company is committed and respect the right of collective bargaining of its employees, as per applicable laws/guidelines/regulations.

### 3.4 Minority's Rights:

Company respect and protect the rights of minorities (e.g., indigenous peoples) and consider the impact of business activities on the human rights of these groups.

#### 3.5 Women's Rights:

Company treat women fairly and equally in all matters. This particularly applies to recruitment, promotion, working conditions, remuneration and social benefits. Any distinction, exclusion or restriction based on gender that has the effect of impairing or frustrating women's recognition, enjoyment or exercise of human rights and fundamental freedom is totally eliminated.

#### 3.6 Prevention of Harassment

The Company is committed to treat its employees with dignity and provide a work environment free from all forms of harassment, whether physical, verbal or psychological. The Company has 'zero tolerance' towards and prohibits sexual harassment and/or any conduct that may foster an offensive or hostile work environment, including unwelcome or unsolicited sexual advances.

Company has also separately adopted and implemented <u>'Policy on Prevention of Sexual Harassment at Workplace'</u> (POSH) in terms of 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' and Rules framed thereunder.



#### 3.7 Remuneration and Benefits

Company committed to pay labourers at least the minimum wage required under applicable laws, without any gender discrimination.

Further, Company ensures compliance with applicable laws related to wages, work hours, leaves, leave with wages, retirement / separation benefits, to both regular employees of the company as well as workers deployed by contractors.

#### 3.8 Safe and Healthy Workplace

Company is committed to provide safe working environment and occupational health & safety is prime focus area across its operations. Company is committed to provide and maintain a safe and healthy workplace by addressing the risks of accident, injuries and hazards on a continuous basis. The Company is focused on inculcating a culture of awareness, training, monitoring and participation on health and safety matters.

The Company is also committed to maintain a workplace that is protected and secured from violence, intimidation, harassment or any other form of disruptive conditions due to internal or external threat. Employees are encouraged to highlight concerns and suggestions related to occupational health and safety hazards to the Company for redressal.

Freedom to work and respect for individual's concern, opinion for good industry practices are the mantras that dominate day-to-day working of the Company.

# 3.9 Right to Privacy

The Company is committed to protect the right to privacy of its employees and other stake holders. The Company does not disclose personal information/data to third parties, without consent of its stakeholders, unless required by law/statutory authorities etc.

## 3.10 Training and Development

The Company is committed to impart all necessary and relevant Trainings like skill upgradation, safety awareness, awareness about human rights, environmental protection etc. and provide opportunities for career development program to all employees to enhance their skill sets and knowledge base.

# 3.11 Anti-Bribery and Anti-Corruption

The Company has zero tolerance towards malpractices of bribery or corruption by employees, associates, contractors, suppliers or other stakeholders in any form. The Company expects that all its employees, associates, contractors, suppliers and other stakeholders at all levels conform to the highest moral and ethical standards, and fostering a culture of honesty, integrity and transparency.

The Company has also adopted separate Anti-Bribery & Anti-Corruption Policy and Whistle Blower Policy and mechanism for reporting concerns about unethical conduct, actual or suspected fraud.



#### 3.12 Local Community / Stakeholder Engagement

The Company respect cultures, traditions, customs and values of the people in the communities in which it operates. The Company engages with local communities on human rights matters that are important to them. The Company aims to ensure through dialogue that it is listening to, learning from and considering their views on surrounding ecosystem, as it conducts its business operations.

The Company endeavours, within the scope of its capabilities, to promote the fulfilment of human rights through improving the economic, environmental and social conditions, and further serve as a positive influence at places where it operates for sustainable development of the community at large.

#### 3.13 Adherence for Human Rights legislation

To the extent applicable, the Company shall comply with all applicable laws related to human rights, safe working conditions and equal opportunities, which shall include but not limited to:

- (a) The Rights of Persons with Disabilities Act, 2016 and Rules made thereunder.
- (b) The Transgender Persons (Protection of Right) Act and Rules made thereunder,
- (c) The Sexual Harassment of Women at Work Place (Prevention, Prohibition and Redressal) Act, 2013,
- (d) HIV & AIDS (Prevention & Control) Act 2017,
- (e) Scheduled Castes And Scheduled Tribes (Prevention of Atrocities) Act, 1989, etc.

Company aims to promote inclusiveness and strives to maintain a work environment that is free from any harassment or discrimination of 'persons with disability' and provide them equal employment opportunities, without any discrimination.

#### 4. Grievance Redressal

Appropriate systems and mechanisms for redressal of grievances, such as Whistle Blower Policy are in place to facilitate the resolution of any issue raised under this Policy.

Any violation under this Policy to be reported by any concerned person to the HR Head of respective Unit. Further, any alleged violation can also be reported through mail at whistleblower@fiemindustries.com.

The Management will conduct the enquiry and will take appropriate remedial actions for such grievances.

