

Child Labor and Human Rights Policy

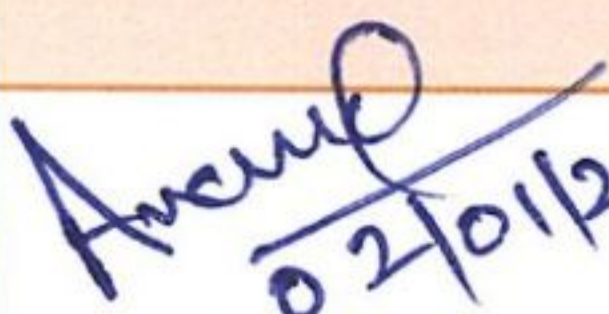
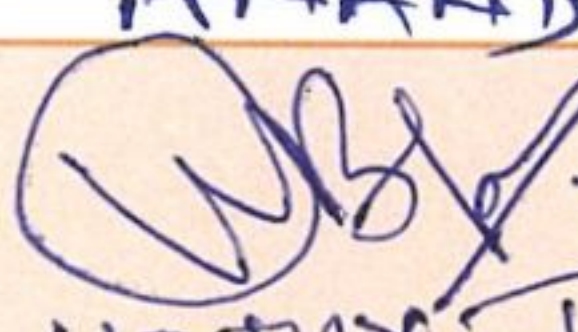
APPLICABILITY	All Symbiotec Group of Companies
POLICY ADMINISTRATION	
INITIATED BY (Signature with Name)	 02/01/24 ANAND SHEEL
APPROVED BY (Signature with Name)	 VAJAY BAJPAI
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Throughout this document, the following verbal forms are used:

- “**shall**” or “**must**” indicate a requirement.
- “**should**” indicates a recommendation.
- “**may**” indicates permission.
- “**can**” indicates a possibility or a capability.

Information marked as “NOTE” is for guidance in understanding or clarifying the associated topic.

1. PURPOSE

At Symbiotec group of companies we are led by a strong purpose: to help customers and society accelerate the transition to a sustainable future. Sustainability, at Symbiotec group of companies encompasses Environmental, Social and Governance topics. We strongly believe that the respect of labor and human rights contributes to reinforce our social posture as we care about the impact of our decisions on human rights and preventing harm to any person.

Symbiotec group of companies is committed to supporting the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO (International Labor Organization) Core Conventions on Labor Standards.

2. SCOPE AND EXPECTATIONS

This Labor & Human Rights Policy applies to entire Symbiotec group of companies, and we expect and support our upstream and downstream supply chain partners, suppliers, and third-party contractors (consultants, temporary workers, volunteers working on any

Symbiotec' s sites) to comply with the principles set forth in this Policy.

Symbiotec group of companies expects that any employee, business partners and other parties whose impacts may be directly linked to Symbiotec' s operations to report any violation to this Policy, to their manager, Human Resources Department or Speak up line. The whistle-blower process and protection of the whistleblowers are detailed in the Symbiotec' s Vigil Mechanism Policy.

3. OUR COMMITMENT

Symbiotec group of companies adheres to Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO (International Labor Organization) Core Conventions on Labor Standards. We also comply with the national laws and regulations. We operate as stated in our Code of Conduct. We have identified the following areas of focus related to human rights:

3.1 Child / Forced labour

We commit to respect human beings and subsequently children's rights. We do not tolerate child labor and work actively against all forms of exploitation of children in any areas of our operations, facilities, and supply chain. We do not provide employment to children before they have reached the legal age, as defined by the Indian regulations, and do not compromise on the basic requirements defined in the UN Convention of the Rights of the Child.

All forms of forced and compulsory labor are against our principles. We do not practice or tolerate any form of exploitation or forced or compulsory labor, indentured labor, bonded labor, slave labor or any form of human trafficking, and we expect our suppliers to follow the same principles.

3.2 Freedom of Association and Social dialogue

We recognize and respect the right of our employees to freedom of association and their rights to collective bargaining (incl. labor unions). The employment of a worker is not contingent upon the condition that such worker joins or not a union or be forced to relinquish trade union membership. Furthermore, union membership shall not be the cause for the dismissal of, or otherwise prejudice against, a worker.

We respect freedom of association and the right to collective bargaining in accordance with the local laws, enabling employees to join unions and voluntarily negotiate. We are committed to cooperating with the employees' representatives' organizations and to having a meaningful and constructive relationship with trade unions at local and national level we engage in social dialogue at every level and if required shall enter into bi partite agreements that advance the right of workers.

3.3 Equal opportunities and non-discrimination

We are committed to an inclusive work culture. We appreciate and recognize that all people are unique and valuable and should be respected for their individual abilities. We do not tolerate any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age, or political opinion.

We provide equal employment opportunity and treat all employees fairly. Our leaders and managers shall only use merit, qualifications, and other professional criteria as the basis for employee-related decisions regarding, for instance recruitment, training, compensation, and promotion.

3.4 Fair wages/ compensation

We pay every worker adequate compensation for the work he/she performed. It is sufficient to meet the worker's basic needs and their families within the working hours set by national law. We provide equal pay for equal work and do not tolerate any discrimination related to origin, nationality, religion, race, gender, disability, or age. We comply with the national legal standards and the rules of the Madhya Pradesh state government.

3.5 Working conditions incl. hours

We treat all employees fairly and honestly regardless of where they work. We recognize the right to rest and leisure and therefore comply with local laws, regulations and/or local customs regarding working hours and overtime.

All employees are entitled to good working conditions, rest breaks, rest facilities, privacy and drinking water at their place of work. Moreover, they also receive paid holiday leave in accordance with the rules of the Madhya Pradesh state government.

3.6 Health & Safety

We do not compromise on a safe and healthy working environment for all employees, and we commit to offering safe and healthy workplaces in accordance with national legislation and international standards. We have H&S prevention programs and SOPs and aim at a clear objective of zero accidents across all our sites. We seek continuous improvement of occupational health and safety performance for all our employees. Our involvement is described in the Symbiotec's Health and Safety Policy.

3.7 Diversity, Inclusion and Prevention of Harassment

Symbiotec group of companies is committed to:

3.7.1 Encourage equality, diversity, and inclusion in the workplace as they are good practice and make business sense.

3.7.2 Create a working environment free of bullying, harassment, victimization, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all employees are recognized and valued.

This commitment includes training of all the leaders, managers and other employees about their rights and responsibilities under the equality, diversity, and inclusion. Responsibilities include staff conducting themselves to help the organization provide equal opportunities in employment, and prevent bullying, harassment, victimization and unlawful discrimination.

All employees should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimization and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public

3.7.3 Take seriously complaints of bullying, harassment, victimization and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organization's work activities.

Such acts will be dealt with as misconduct under the organization's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment which is not limited to

circumstances where harassment relates to a protected characteristic – is a criminal offence.

3.8 Grievance Redressal

It is expected that as a first step, employees will attempt to resolve the issues between themselves. Where this is not appropriate or does not result in a satisfactory resolution, a more formal procedure as outlined in the Grievance – Resolving Issues and Concerns Policy can be applied.

The dispute resolution process will operate within the following principles: Confidentiality, Impartiality, Promptness, Sensitivity, Courtesy and Respect.

Disputes may be resolved in a formal or informal manner. Where possible, as a first step and with the agreement of both parties, the dispute may be resolved informally. If the dispute is not resolved at the informal level, then the formal process provides graduated steps for further discussion and resolution at higher levels of authority. A formal resolution requires a thorough investigation to be undertaken, and the process documented.

Appropriate managers will investigate a complaint or allegation of behavior that is contrary to these standards. Investigations will be conducted with sensitivity and fairness while maintaining confidentiality.

The following list is not meant to imply any chronological order for action. The action taken should be entirely up to the concerned Supervisor, Head of Department. The action includes:

- Reporting breaches of Code of confidential, anonymous basis. If the employee wishes to report a potential or actual breach of this Code on a confidential anonymous basis, you should promptly submit a verbal or written report to the Supervisor/ Manager/ Head of Department. Any such breach of Code can be reported on an anonymous basis to the grievance@symbiotec.in id. All such grievances will be directed to the Compliance Officer of the Company.
- The designated person who received the complaint will speak to the individual(s) deemed responsible, directly identifying the problem, and seeking to resolve the concern.

- The designated person who received the complaint will speak to the appropriate supervisor, department head or manager for the individual or individuals about whom the complaint is being made.
 - If further action is required, a meeting will be set up with the parties concerned and with designated person in charge of applying, mediating and issuing orders or dispute resolution related to the code of conduct of policy. Results of this meeting are to be held confidential by all parties with reports going only to those individuals acceptable to both parties.
 - That designated person must establish a formal enquiry to validate the complaint and advise the Head of the Company or whoever is in authority regarding an appropriate reaction. The nature of such an enquiry process will be at the discretion of Head of Department or whoever is designated by the Authority.
 - The aggrieved employee must first submit his grievance in writing to Site HR Head. Grievances must be submitted within 30 calendar days following the date employee first knew or should have known of the grievance. If employee do not submit the grievance within the 30-day period, he waives his right to assert it.
Site HR Head shall form the Grievance Redressal Committee which shall consist of equal number of members from the management and the workmen. Site Head and Site HR Head shall be the members of the committee. Site Head shall be the chairperson of the committee. The members of the Grievance Redressal Committee shall be selected alternatively on rotation basis every year.
- a) Site HR Head shall record the grievance in 'Grievance Register' and forward the grievance application to Grievance Redressal Committee.
 - b) The Grievance Redressal Committee shall conduct investigation and set the grievance of the employee.
 - c) The Grievance Redressal Committee shall complete its proceedings within thirty days on receipt of a written application by or on behalf of the aggrieved party.

- d) The employee who is not satisfied with the decision of the Grievance Redressal Committee may prefer an appeal to the Chief Human Resource Officer (CHRO) against the decision of Grievance Redressal Committee.
- e) The Chief Human Resource Officer (CHRO) shall, within 30 working days from the date of receipt of such appeal, dispose off the same and send a copy of his decision to the concerned employee.

The company is committed to maintaining anonymity and protection of the person or the whistleblower who registers complaint/grievance with respect to violation of Code or a fraud or bribery or a possibility of such incidence in the Company.

4.0 HUMAN RIGHTS DUE DILIGENCE

At Symbiotec group of companies, we are committed to upholding the highest standards of human rights across our operations and value chains. The Executive Committee of Symbiotec group of companies is responsible for ensuring adherence to these commitments and our management has responsibility for communicating this Policy, overseeing their implementation, and holding all employees accountable for compliance. Considering the impacts human rights violation can cause, Symbiotec group of companies, throughout its different experts (and potential external parties) is engaged in appropriate actions to identify, prevent, or mitigate those impacts in its value chains.

4.1 Internal Audit

As per the SOP on labour compliance effectiveness, site HR teams shall perform internal audit and review the compliance effectiveness on half yearly basis.

4.2 Transparency and Reporting

We maintain a transparent approach by regularly tracking and reporting on our human rights efforts, and ensuring our stakeholders are informed of our progress.

5 MEETING OUR HUMAN RIGHTS COMMITMENTS

To meet our human rights commitments, Symbiotec group of companies takes the following actions:

5.1 Responsibility and Oversight

Designated roles within our management for ensuring continuous oversight and adherence to this Policy.

5.2 Risk Management

We prioritize the most salient risks, continuously improving our due diligence practices through assessments and remediation strategies.

5.3 Supplier Engagement

Collaborating with suppliers, we work to instill respect for human rights in every aspect of the supply chain.

5.4 Continuous Improvement

Aligned with our values of innovation and integrity, we are dedicated to constant enhancement of our human rights approach, seeking new ways to protect and promote human rights within the Symbiotec group of companies.

7. TRAINING

Training of this policy is to be provided to every employee on joining the company and refresher training on once in a year.