



HUMAN RIGHTS COMMITMENT

OBJECTIVE

- a) As a member of United Nations Global Compact (UNGC) we are committed to Human Rights Principles and respect all internationally recognized human rights standards as per International Bill of Human Rights and the ILO's Declaration on the Fundamental Principles and Rights at Work.
- b) We abide by all the applicable domestic laws pertaining to human rights to conduct our business in a manner that respects the rights and dignity of all people.
- c) We strive to provide a framework for respecting, protecting, and remediating human rights issues for all direct and indirect stakeholders, viz., permanent employees, temporary/contractual staff, vendors, customers, and consultants.

SCOPE

This policy covers board of directors, permanent employees and workmen, contractors including sub-contractors, temporary/ contractual staff, vendors, suppliers, customers, and consultants.

PRINCIPLES

- a) We recognize that it is critical to promote awareness on human rights among employees, suppliers, vendors, customers, and other relevant internal and external stakeholders. We respect the rights of communities surrounding all our Company's premises and ensure that such communities are part of our overall welfare and engagement programmes. We encourage our employees to volunteer for our corporate social responsibility projects that benefit society.
- b) We have identified freedom of association, expression and collective bargaining, right to equality between men and women, right to privacy, right to just and fair conditions at work, right to safe and healthy working environment, water and sanitation, rights of women and prohibition of child labor as our priority areas of focus on human rights protection.

c) Freedom of association, expression and collective bargaining:

Our employees are free to join/ form or refrain from joining/ forming employee collectives without fear of retaliation or harassment. We are committed to establishing constructive dialogue with employee labor representatives and entering into mutual agreements with them in good faith. Relevant information will be shared on a need basis and as per the discretion of the management.

d) Right to equality between men and women:

- i. We are committed to creating and maintaining an atmosphere in which our stakeholders can work together without any fear of sexual harassment, exploitation, or intimidation.
- ii. We respect diversity and believe in creating an inclusive work environment. We abide by a zero-tolerance approach towards discrimination based on color, gender, race, age, nationality, social status, disability, ethnicity, religion, sexual orientation, political opinion, and marital status. Any violations in this regard are handled with strict, appropriate, and timely action in consonance with applicable laws.
- iii. We educate all our employees irrespective of gender on inclusivity and provide them with equal opportunities to contribute to our company and advance in their careers.



- iv. We have incorporated merit-based processes in recruitment, compensation, and career development of employees.

e) Right to privacy:

We respect the privacy of all our employees and business partners by taking measures that are prescribed by law to protect and secure personal data and prevent unauthorized disclosure. We do not disclose employees' personal, medical, and financial information to anyone other than authorized employees of the company, unless legally mandated. We protect confidential company information from unauthorized disclosure.

f) Right to just and fair conditions at work:

- i. We ensure adherence to minimum working age requirements prescribed by local regulations and prohibit employment of child labor across our operations.
- ii. We ensure the right to fair compensation and endeavor to comply with all applicable labour laws pertaining to wages, work hours, overtime, and employee benefits.
- iii. To ensure that no employee is made to work against his/her will or to work as bonded/forced labor or subjected to corporal punishment or coercion of any kind, related to work.
- iv. We are committed not to use forced labor, including bonded, indentured labor or engage in any form of forced labor or human trafficking in our operations. We are committed to the same in our supply chain as well. Our supplier code of conduct prohibits our suppliers from deploying any kind of child or forced labor.

g) Right to safe and healthy working environment, water, and sanitation:

We strive to protect the safety, health, and well-being of all our stakeholders through Employee Health & Safety management systems and adherence to safety requirements. We encourage them to report any unsafe or hazardous conditions noticed in the workplace to the management.

h) Rights of Women:

Rights of women will be protected at all times as per the labour laws governing our industry.

i) Prohibition of Child Labor:

We prohibit employment of child labor, and we govern prohibition of child labor at Neuland through the child labor policy.

IMPLEMENTATION

4.1. Communication and Training

This policy will be communicated to all employees, including contract labour and relevant stakeholders, periodic sessions will be conducted to educate employees on Policy, risks, and prevention. Training will be conducted either on-line or in-person or a combination of both and the training will be required to be completed within a specified timeframe.

Awareness of this Policy will form part of the induction process, and wherever required, employees will receive relevant input on how to implement and adhere to this Policy. Our Company may also extend training programs to third parties such as labour contractors, if it is envisaged that the work profile allocated to them carries a significant risk as per this Policy.



4.2. Risk Assessment

We will have a process in place for conducting due diligence prior to engaging with third parties to assess human rights risks and periodically review third-party relationships. Human rights risks shall also be evaluated in mergers, acquisitions and joint ventures.

GRIEVANCE REDRESSAL & REMEDIATION

- a) It is mandatory that all our stakeholders strictly adhere to the principles and condemn any violation or suspected violation of this policy. Breaches of the principles enshrined in the policy are treated very seriously and handled with appropriate actions including legal remediation.
- b) We encourage employees to raise their concerns and ask for any help/ clarification in case of any violation/ perceived violation of human rights. They can send an e-mail to grievances@neulandlabs.com stating the nature of their grievance which will be addressed as per the Grievance Redressal policy. Similarly, contract labor can reach out to the site Human Resources team and share their concerns around violation of this Policy.
- c) Grievance Redressal Policy shall be displayed at conspicuous places across all locations and shall be communicated to all internal and external stakeholders.
- d) Any violations of this policy may also be reported under the Company's Whistleblower policy, by writing to whistleblower@neulandlabs.com and whistleblower.neulandlabs@gmail.com and the matter will be investigated under whistleblower mechanism. The Whistleblower Policy is available on the Company's intranet, Basecamp, and on our website, www.neulandlabs.com.

RESPONSIBILITY

Respective Location HR Business Partner (HRBP) would be responsible to ensure policy compliance at their respective locations whereas overall responsibility for policy compliance lies with the Chief Human Resources Officer.

EXCEPTIONS

Any exceptions to the policy shall be approved by the Chief Human Resources Officer.

REVIEW

Company reserves the right to review, withdraw or modify the policy as and when required without prior intimation.