

Policy: Human Rights

1) Why this Policy?

CIEL Group is a holistic talent solutions provider, one destination for all HR needs. We recognise and respect the human rights of all individuals impacted by its operations, including employees, contractors, sub-contractors, suppliers and external stakeholders. CIEL is committed to respecting the human rights of its workforce, communities and those affected by its operations wherever it does business. CIEL seeks to avoid involvement in human rights abuses, identifying, assessing and minimising potential adverse impacts through due diligence and management of issues and resolving grievances from affected stakeholders effectively.

This policy is intended to express CIEL's commitment to carry out the business with ethical values and embrace practices that support human rights in every geography, where it operates.

2) Scope of the policy

The Policy covers the following issues that are relevant to CIEL's business, and is applicable to all its employees, business partners, contractors, suppliers and other Stakeholders.

- Safe & healthy workplace
- Workforce diversity, Non-Discrimination and Inclusion
- Equal opportunity
- Prevention of Harassment
- Prohibition of Child Labour and Forced Labour
- Right to Privacy
- Anti-Corruption
- Local Community / Stakeholder engagement

3) Conduct at Work

3.1 Safe and healthy workplace:

CIEL is committed to providing and maintaining a safe, healthy workplace by addressing the risks of accidents, injuries and hazards on a continuous basis. CIEL is focused on inculcating a culture of awareness, monitoring and participation surrounding health and safety, either directly or through agency or contractor, as applicable. CIEL is committed to providing compensation in case of incapacity or loss of life, to the victim or dependent as the case may be directly or through agency or contractor, as per applicable policy or regulation or laws.

CIEL is also determined 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 threats. Employees are encouraged to raise concerns and suggestions related to occupational health and safety hazards to the CIEL for redressal.

3.2 Workforce Diversity and Non-Discrimination:

CIEL encourages an inclusive work environment, wherein diversity is valued and equal opportunities are available to all employees and stakeholders. CIEL follows applicable laws and regulations in the matter of deciding wages/salaries, hours of work and welfare measures in compliance with the state laws in which it operates. CIEL endeavours that the work environment across its operations remains free from discrimination in any form.

3.3 Equal opportunity:

CIEL provides equal opportunities, without any discrimination or prejudice in the matter of compensation, training and employee benefits on the basis of age, color, marital status, gender, nationality, geography, ethnicity, race, religion, or sexual orientation. CIEL endeavors to maintain a work environment that is free from any direct or indirect discrimination based on the above considerations. This Policy is subject to applicable regulations, qualifications, and merit of the individual. This Policy is consistently applied throughout the period of employment of the individual rights from the recruitment process to superannuation.

3.4 Prevention of Harassment:

CIEL is committed to treating its employees with dignity and providing a work environment free from all forms of harassment, whether physical, verbal or psychological. CIEL has 'zero tolerance' towards harassment and/or any conduct that may foster an offensive or hostile work environment. CIEL is committed to respecting the rights of all its employees and strives to provide them with a work environment that's free from any form of harassment.

3.5 Prohibition of Child Labour and Forced Labour:

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

3.6 Right to Privacy:

CIEL is committed to protecting the right to privacy of its employees and other stakeholders. CIEL does not disclose personal information/data to any third parties, without the consent of its stakeholders, unless required by law/Statutory Authorities etc., to do so.

3.7 Anti-Corruption:

CIEL has zero tolerance towards malpractices of bribery or corruption in any form, in its business/operations directly or indirectly. CIEL operates and expects its associates to operate, conforming to the highest moral, ethical standards, and fostering a culture of integrity and transparency.

3.8 Local Community / Stakeholder Engagement:

CIEL respects the cultures, traditions, customs and values of people in the communities in which it operates. CIEL engages with local communities on human rights matters that are important to them such as surface rights, access to clean water, health and sanitation. CIEL aims to ensure through dialogue that it is listening to, learning from and considering their views on the surrounding ecosystem, as it conducts its business.

CIEL 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.

4) Responsibility

- 4.1 Employee Responsibilities - All CIEL employees comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as the representative of CIEL.
- 4.2 Responsibilities of Managers and Supervisors – All Managers and supervisors to take reasonable steps to resolve complaints in accordance with this policy that are brought to their attention and to maintain confidentiality as far as practicable.
- 4.3 Human Resources Responsibilities - Human Resources representatives to provide advice and address grievances relating to employment and/or any other complaints in relation to this policy.

5) Grievance Redressal

- 5.1 Employees have the right to file a complaint concerning any issues with regard to this policy to the Human Resources Department, which then reports to the Grievance Redressal officer.
- 5.2 The Human Resource Manager and the Grievance Redressal officer will follow the procedure and conduct the Inquiry on the complaint/s received. On investigation, if the employee against whom the complaint has been made is found guilty, they will be subjected to disciplinary actions.

6) Policy Review

Management review is held each year to review the implementation of this policy and draw upon further improvements for the following year. These improvements will include the policy itself and the associated business processes to attain the objective of this policy.