

## HUMAN RIGHTS POLICY STATEMENT

## **1 Introduction**

Northern Arc Group (Northern Arc Capital Limited and its subsidiaries) recognizes the value and protection of Human Right in sustenance of its business operations. Northern Arc Group recognizes its role and need to impact the society and environment positively through its business operations. It is committed to respect the human right which form an integral part of our values, mission and vision that underpin our business and creates an opportunity to contribute towards a socially responsible and sustainable society.

The Group's employees carry out several activities by engaging with both internal and external stakeholders continuously and it is important for its employees to maintain high standards of corporate conduct, business ethics and protect human rights. While the risk of human rights being negatively impacted due to the business activities in certain sectors or places, but we at Northern Arc Group is committed to mitigate and reduce those impacts by staying engaged with its stakeholders.

## **2 Scope of the Policy**

This policy applies to all the employees of Northern Arc Group – permanent, temporary, contract and other associates working for the company . Suppliers and vendors need to follow these guidelines while doing business with Northern Arc Group.

## **3 Standards and Frameworks**

Northern Arc Group is committed to the adherence to the applicable national regulations and internationally recognized standards that upholds the values of Human Rights. Few of the international standards that are recognized and adopted by the company are

- International Finance Corporation Performance Standard 2: Labour and Working Conditions
- International Labour Organization's Fundamental Conventions
- International Labour Organization Declaration on Fundamental Principles and Rights at Work

## **4 Commitment**

Northern Arc Group is committed to the following principles of human rights.

#### ***4.1 Prohibition of Child Labour and Forced Labour***

Northern Arc Group would not accept or support the engagement of child labour in any form and would only accept the engagement of persons who meet minimum age requirement for employment as defined by the law. The Group has zero tolerance to forced labour and any form or facet of modern slavery at workplace. The partnering entities are also subjected to avoid engaging in child and forced labour as well as activities identified as modern slavery by the ILO.

#### ***4.2 Diversity, Equity, and Inclusion***

Northern Arc Group nurtures a culture that is rich in diversity, equitable with respect to every individual's life journey and thrive in an environment that fosters inclusion. This is recognized as we operate in a society that is diverse, that includes both our customers and our employees with diverse characteristics, experiences, needs, and aspirations. We are dedicated to upholding the diversity, equity and inclusion in our business operation.

#### ***4.3 Safety & Wellness at Workplace***

Northern Arc Group is committed to provide safe, healthy, and hygienic work environment to all its employees and associates, and we aim to make them uniform across all locations of our operation. We ensure that by maintaining a work environment that is free from violence, harassment, intimidation, physical, verbal or psychological harm and other unsafe and/or disruptive conditions that supports a productive working condition.

#### ***4.4 Maintain Human Dignity***

Northern Arc Group believe in treating its employees and clients with respect and dignity by fostering an atmosphere of open communication and care. We respect the rights of every individual to achieve their professional goal and maintaining work life balance that reflects good work culture. We are also committed to treat those engaged by our companies with due respect and dignity.

#### ***4.5 Freedom of Association***

Northern Arc Group does not prevent employees from exercising their right for freedom of expression in course of their association with the companies. We also recognize their right to freedom of association and organize associations for negotiation and collective bargaining. The group respects the right of employees to form association and join associations of their choice

without fear of intimidation or any form of retaliation, including but not limited to termination, suspension, demotion, blacklisting, or transfer of any employee.

#### ***4.6 Diversity and Equal Opportunity***

Northern Arc Group celebrate diversity and are committed to creating an inclusive workplace where all employees are treated with respect and dignity and provide equal opportunity to everyone solely based on merit and ability. We adopt a zero-tolerance policy towards unlawful discrimination and harassment at the workplace. Discrimination against employees - including on grounds of age, sex, disability, religion, nationality, colour, sexual orientation, and such other characteristics protected by law - is strictly prohibited.

#### ***4.7 Prevention of Sexual Harassment***

Northern Arc Group is committed to and encourages gender equality, and we strive to enable them to deliver their best at work without fear of prejudice, gender bias and sexual harassment. Sexual harassment is observed as a form of discrimination, and we ensure that we keep our workplace free from such acts by ensuring abidance to the principles of equality, freedom, life, and liberty. In the event of sexual harassment, processes and mechanisms instituted in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as defined in our Prevention of Sexual Harassment Policy, will be implemented.

#### ***4.8 Retrenchment***

Northern Arc Group recognizes its responsibility as an employer, and it does not terminate its employment from their service without good reason and understands their requirement of job security. A poorly executed retrenchment process can lead to loss of productivity, low morale, and decrease in economic performance. We ensure that any retrenchment will be based on the principle of non-discrimination and ensures consultation with the employees, their organizations, and where appropriate, the government, and comply with collective bargaining agreements, if they exist.

#### ***4.9 Grievance Redressal***

Northern Arc Group recognizes the importance of an empowered workforce which is key to identify, prevent and mitigate any potential or actual risk / violation of human rights. It also provides an opportunity to improve the policies and procedures that govern the human rights

of our stakeholders. Stakeholders (employees, vendors, suppliers and customer) can raise concerns that pertain to human rights issues through the channels defined under the Prevention of Sexual Harassment Policy, Vigil-Mechanism & Whistle-Blower Policy, Equal Opportunity Policy, by using online grievance management system available on the Company website or by directly reaching to the Grievance redressal team through dedicated email – [grievances@northernarc.com](mailto:grievances@northernarc.com).

#### ***4.10 Communication and Awareness***

Northern Arc Group takes all measures to communicate all necessary and relevant information that concerns the organisational policies, and procedures to all its employees. The awareness among the employees on changes in the policies and procedures pertaining to human rights is created by conducting training sessions for different sets of employee population as required by the member(s) of the Human Resource department. The external stakeholders are kept informed of such information by uploading the relevant documents on the company website(s) for easy access.

Through our continuous engagements with employees, we ensure:

- Promotion of awareness on human right among employees of Northern Arc Group.
- Engage with stakeholders in an inclusive, transparent, and culturally appropriate manner on human rights concerns related to Northern Arc Group's business activities.
- Value diversity and equal opportunity.

#### ***4.11 Governance and Accountability***

The Chief People Officer oversees policy adherence to this policy, and the senior management is also accountable for the same. This Policy Statement shall be reviewed periodically for its appropriateness and updated as necessary by the Board.

#### ***4.12 Reference***

This Policy Statement should be followed in concurrence with other available policies of Northern Arc Group such as Anti-Bribery & Anti-Corruption Policy, Vigil Mechanism & Whistle-Blower Policy, Code of Conduct, Safe Working Environment and Sexual Harassment Policy, Equal Opportunity Policy, and Retrenchment Policy.