Human Rights Policy

Respect for Human Rights:

MTL has been unequivocal in its commitment to promote and protect human rights under the UN Guiding Principles (UNGC) on Business and Human Rights in our relationships with our employees, stakeholders, suppliers, vendors, and business partners. We aim to help increase the enjoyment of human rights within the communities in which we operate. We have been a strong proponent of promoting responsible business to further our commitment to realizing human rights, including inclusive development.

This policy applies to:

- ➤ All direct and indirect employees of MTL & its subsidiaries,
- > Suppliers, subsidiaries, distributors, business contacts, agents, advisors, business associates, current and potential clients, customers, and others act on the organization's behalf.
- While dealing with the Government, public bodies, and non-profit organizations, including their advisors, representatives, officials, politicians, and political parties

Community & Stakeholder Engagement:

MTL is a business bound by a common culture. A vital part of this culture is how our teams engage with and contribute to the communities in which we operate.

We recognize that our success hinges on the smooth functioning of the wider society. We employ thousands of people and benefit from healthy communities. As a firm, we contribute to these societies through our global charitable initiatives and encourage our people to make a personal difference by donating time and resources to benefit non-profit organizations, charities, and other philanthropic endeavors.

We collaborate to support organizations and charities that help build stronger, more sustainable communities.

Diversity, Equality, and Inclusion:

We are committed to advocating and promoting diversity, equality, and inclusion. We believe that Diversity, Equality, and Inclusivity (DE&I) at the workplace is an instrument for growth, and we value and celebrate the uniqueness of every individual by fostering an environment of inclusion and empowerment. We believe success means equality of opportunity for all our people, thus creating an inclusive environment that values the diversity of background, experience, ideas, and opinions. Enhancing diversity efforts across all underrepresented groups supports our most important asset, our employees, and, we believe, makes us more competitive and better investors. MTL promotes and supports a diverse workforce across all levels.

The Organisation is dedicated to creating a fair and transparent work environment with mutual respect. We work to maintain workplaces free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Organisation is qualifications, performance, skills, and experience.

[Read More: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Freedom of Association and Collective Bargaining:

We respect our employees' right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment. A legally recognized association represents employees; we are committed to establishing a constructive dialogue with them/works committees/individually through collective bargaining. The Organization is committed to collective bargaining in good faith with such representatives.

Equal Opportunity / Anti-Discrimination:

The Organization prohibits employment discrimination based on Caste, Race, Sex, Color, Creed/Grade, Religion, Disability, Age, Height, Weight, Veteran status, or Marital status. It does not permit the lowering of bona fide job requirements, performance criteria, or qualifications to give preference to any employee or applicant for employment based on the above basis of discrimination.

MTL's Policy on Harassment at workplace anti-discrimination applies to everyone who works with or is engaged in the operations of the Organisation.

Harassment is any form of behavior that is unwelcome, unsolicited, unreciprocated, and usually (but not always) repeated. It is the behavior that has the purpose or effect of violating

an associate's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. In the perception of the recipient of the conduct, it should reasonably be considered as having that purpose or effect.

For harassment to occur, there does not have to be an intention to offend or harass. It is the impact of the behavior on the person receiving it, together with the nature of the behavior, which determines whether it is harassment.

Some common examples of harassment are:

- ➤ Telling insulting jokes about groups and/or genders.
- Displaying offensive posters or screen savers.
- Making derogatory comments about someone's race or religion.
- Improper physical contact, derogatory language, or intimidating actions.
- Using any abusive language in the workplace.
- Insulting or threatening gestured or language (overt or implied) or continual and unwarranted shouting in the workplace.
- Unjustified and unnecessary comments about an associate's work or capacity for work.
- > Openly displayed pictures, posters, graffiti, or written materials might be offensive.
- Phone calls or messages on electronic mail/snail mail or computer networks are threatening, abusive, or offensive to associates.
- ➤ The exclusion of an associate or group from regular conversations, work assignments, work-related social activities, and workplace networks.

Abuse by a reporting manager concerning an employee who reports to them or over whom they have supervisory authority and which:

- Intimidates, humiliates, or undermines another associate by belittling them, or
- Excessively, destructively, or inappropriately criticizing or reprimanding them, or overly scrutinizing their work, or
- Makes demands that are unreasonable and outside that other associate's role; or
- Makes demand to perform an action that is in breach of the principles of any policy of MTL.

[Read More: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Prevention of Sexual Harassment:

The Organisation aims to provide a safe working environment and prohibit sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. Therefore, MTL's Policy on Prevention of Sexual Harassment intends to prohibit such occurrences and detailed procedures from following when an employee believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment. The policy outlines the preventive measure and framework for dealing with complaints if raised.

The Company mandates once in two years all employees to undergo training on POSH, which includes an assessment subsequently.

[Read More: POSH.pdf (manjushreeindia.com)]

Environment, Health & Safety:

MTL is committed to conducting its operations using principles of sustainable development to minimize the impact on the environment and protect the health and safety of our employees, service providers, neighbouring communities, and customers.

[Read more: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Ethics:

The Organization demonstrates greater transparency in the transaction. We commit to strict ethical and lawful business while transacting with all external and internal customers, the Government, and the general public. The Organization adheres to stringent quality measures in all the products and services provided to the customers. The Organization adds more excellent value to the development and services provided to the customers by implementing the constructive feedback received from the internal and external customers and practicing continuous improvement. The Organization is committed to strict compliance with all laws and regulations of the land.

[Read more: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Healthy Workplace, Work Hours, Wages & Benefits:

We maintain a healthy working atmosphere in the Organization by treating all the employees diligently and boosting their morale. We conduct regular assessments and ensure compliance with various Organization policies and procedures.

We compensate employees competitively relative to the industry and local labor market and under terms of applicable laws. We ensure full compliance with applicable wage, work hours, overtime, and benefits laws.

In addition to wages and salaries, MTL provides employees with various services and programs known as employee benefits [Read more: <u>Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)</u>].

Child Labour:

MTL prohibits child laborers and forced or compulsory labor, including bonded labor, slavery, and human trafficking. No child shall be employed or permitted to work directly or indirectly through contractors in any of the units of the Organization and vendors/suppliers.

[Read more: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Modern Slavery, Forced / Bonded Labor and Human Trafficking:

MTL's philosophy is to respect and promote human rights, and, as part of this, MTL is committed to addressing modern slavery in our business, operations, and supply chains.

We are committed to exhibiting zero tolerance towards all facets of modern slavery, as elaborated under the UN Declaration of Human Rights and the conventions of the International Labour Organisations specified to forced or compulsory labor.

The Organization prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking.

Flexible Work Culture:

Providing a flexible work culture helps us retain talent and keeps our employees motivated and engaged.

We have a suite of flexible work arrangements across pan India, which may include benefits like Paternity and Maternity leave [Read more: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)], Time off for personal reasons, time off for Individual Corporate Responsibility, and Corporate Social Responsibility activities, etc.

Promoting Employee Morale, Skill Upgradation, and Career Development:

All our employees are covered under competency development programs relevant to their role in the Organization. Our Competency Development Program brings relevance and flexibility to competency development for a position along multiple competency dimensions. Our continuous education programs like Prarambha, Pragathi, delivered through the T&D as a Service platform, span technology, domain, business, process, behavior, and leadership.

The T&D platform enables employees to stay relevant and develop a culture of continuous learning. The T&D platform deploys Skill Knowledge Unit (SKUs) to provide a holistic education for employees and offers interactive, on-demand, contextual, and personalized upskilling to employees in self-service mode through world-class content and assessments from various learning partners.

We provide training to all employees without differentiating on gender, age, or physical ability. We also have specialized programs for senior leadership. Our Training group offers industry-benchmarked learning programs to ensure talent enablement. The Training Team has many learning offerings and interventions, including technical, managerial, and process

skills, industry domain knowledge, and leadership skills for employees and our strategic clients.

Public Reporting:

We report to the public on our Human rights-related policies, commitments, efforts, and statements consistent with this Human Rights Policy through our website.

Grievance Mechanism:

MTL implements the standards in related policies, processes, and guidelines across all our business operations. MTL conducts training to strengthen in-house awareness and education on the practice of human rights. MTL believes that an empowered workforce is the best way to receive feedback and identify improvement areas.

[Read More: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Whistle Blower:

MTL believes that all the violations should be brought to the notice of the management. This helps the management avoid fraud activities that are occurring / might occur due to specific negligence in the system in the Organization with regards to monetary & non-monetary assets. An employee, customer, vendor, stakeholder, or business partner who observes an unethical or improper practice (not necessarily a violation of the law) shall be able to approach the Audit Committee/ Management/ HR without necessarily informing anyone.

MTL's Whistleblower Policy is a critical means through which stakeholders can raise actual or suspected violations. Ethics Counsellor/Chairman of the Audit Committee is in charge of investigative procedures laid down and defined under the Whistleblower policy.

[Read more: Microsoft Word - Employee Handbook - New V1 (002) (manjushreeindia.com)]

Data Privacy:

MTL is committed to protecting employees' data privacy (including ex-employees and retirees), customers, and suppliers. Our current data protection and privacy framework include multi-layer password-protected authentication systems, automatic tools and tracking mechanisms, audits, and information sharing on a need-to-know basis. We do not disclose information to third parties without the explicit consent of our stakeholders unless required by law to do so.

Our security incident management process allows reporting of data breaches and policy violations. MTL also has a nominated & designated appointed Data privacy officer who can be reached at info@manjushreeindia.com to escalate privacy issues.

MTL's training program comprising all policies on Human rights and related is intended to give employees the understanding and awareness required to carry out their responsibilities in compliance with the Organisation's regulations. Assessment of training & understanding level is mandatory for all employees of MTL.