

SUN360 HUMAN RIGHTS POLICY – COMMITMENT FRAMEWORK

Introduction:

The Company has drafted and published a policy on ensuring the conformance to Human Rights. The commitment framework document describes Sun360's implementing procedures on the Human Rights policy. These Implementing Procedures provide guidance for effectuating the principles expressed in the Policy.

Sun360 respects and supports the dignity, wellbeing, and human rights of all stakeholders. Sun360 is committed to developing a culture which inculcates respect and support for Human Rights and seeks to avoid connivance in Human Rights abuses. This policy is in accordance with the principles of International Labor Organization.

Sun360 would ensure conformance to fundamental labour principles including the prohibition of child labour, forced labour, freedom of association and protection from discrimination (based on age, gender, marital status, differently abled, race, national/ regional origin, ancestry, indigenous status, personal beliefs, religion & spiritual practice, political affiliation, sexual orientation and HIV/AIDS) in all its operations by imparting relevant training and aligning the conduct of its employees.

Commitment framework:

1. Dignity of all stakeholders:

1. Customer - Company should consult with the customer in a sensitive and open process. Strive to achieve the free and informed consent.
2. Employees – Employees need to adhere to Sun360 Code of Conduct and shall be treated with dignity and in accordance with the Sun360 policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological.
3. Contractors/ suppliers - Contractors and suppliers are expected to maintain a work environment free of all forms of harassment, whether physical, verbal or psychological. Sun360 shall ensure that violations within Sun360 premises are addressed appropriately.

2. Well being:

1. Physical and mental health of stakeholders involved in workplaces of the Company (employees, contractors, etc).
 - i. Making available clean, potable water in the workplace.
 - ii. Supplying protective equipment and training necessary to perform tasks safely.
 - iii. Ensure that company operations do not adversely impact long term health of individuals.

- iv. Not subject pregnant or breastfeeding women to conditions that would be harmful for them. Company will grant breastfeeding women reasonable breaks and a designated area where feasible for breastfeeding during work hours.
 - v. When operating in areas where contagious diseases are endemic, providing appropriate information and training to mitigate risk.
2. Maternity related: Company will:
- i. Provide women with maternity leave for the period as prescribed under the Maternity Benefit Act, without risk of losing their employment or responsibilities.
 - ii. Grant women temporary leave in case of illness or complication related to pregnancy or birth, without risk of losing their employment.
3. Injury & illness: This covers an individual with a temporary or permanent disability, physical or otherwise. Sun360 will:
- i. Provide emergency care as necessary.
 - ii. Give reasonable time to recover from the injury or illness.
 - iii. When the individual returns, Company will ensure that injured/ ill individuals are given appropriate duties and assistance while they recover from the injury or illness. This might include making reasonable adjustments to the workplace, although these should not cause the business unjustifiable hardships.

3. Culture of respect & support for Human Rights – Sun360 acknowledges human rights of its Stakeholders and it forms the central part of our community relations:

1. Understanding the perspectives of local/indigenous people through consultation & respecting their rights:
 - i. Company need to understand the impact that operations can have – and it is often unintended consequences that cause problems for local people, including minorities or indigenous people.
 - ii. Company should create awareness among our employees of the perspectives of local people’s attitudes, beliefs and values which need to be protected. Employees should draw attention to any gaps or inadequacies, and share insights.
2. Conditions of work & wages: Being trained to work and then working in safe, healthy and environmentally responsible ways comes first and foremost.
 - i. Factory Act 1948 forms the basis for recording and notification of occupational accidents and diseases in the organization.
 - ii. Ensure that wages are in accordance with the Minimum Wage Act & law of the land. Ensure that employees are fairly remunerated, and that wages are regularly reviewed in a fair process.
 - iii. Company will over time harmonize health and safety standards.
3. Privacy: Company will:

- i. Ensure that, upon request, individuals will be made aware of personal information that the business maintains on them, where it is held and how it can be updated.
- ii. Not ask workers about their health or pregnancy status except when the status is directly relevant to the performance of job duties, and seeking to keep such information confidential.
- iii. Ensure adequate protection of personal information held by the company.
- iv. Only provide an individual's personal or other information to government authorities to the extent required by law and upon request, or with the individual's permission.
- v. Seek to minimise the use of monitoring, surveillance and security measures that may invade the privacy of individuals to the extent practicable, and using such measures solely for the legitimate business purpose of protecting its assets and the safety of its workers or others.

4. Avoiding connivance in Human Right abuses: Company will ensure its non- involvement in human right abuses related to:

1. Child labour:
 - i. We need to make our contractors, suppliers and others with whom we have a substantial involvement strongly aware of the standards, which we expect from them.
 - ii. Company may opt for a strategy of constructive engagement with offending suppliers, rather than simply terminating contracts with them. However, if there is no positive impact observed in the employment practices of contractors/ suppliers and others; Company must terminate the business dealings.
2. Forced labour:
 - i. Company will not make use of slave, forced or compulsory labour in any form. The company will ensure that employees are free to resign.
 - ii. Ensure that all feasible measures are taken to prevent workers from falling into debt bondage through company loans.
 - iii. Company will refrain from retaining the personal papers of its employees (for eg - passport, Aadhar card, educational certificates etc).
 - iv. We need to make our contractors, suppliers and others with whom we have a substantial involvement strongly aware of the standards, which we expect from them.
 - v. Company may opt for a strategy of constructive engagement with offending suppliers, rather than simply terminating contracts with them. However, if there is no positive impact observed in the employment practices of contractors/ suppliers and others; Company must terminate the business dealings.

5. Adherence to principles of ILO & UNGC:

The rights and freedoms may in no case, be exercised contrary to the purposes and principles of the ILO & UNGC.

6. Freedom of association:

1. Employees doing the same work to the same standards of flexibility and productivity will receive comparative remuneration and employment conditions, whether employed under individual or collective agreements.
2. Company does not interfere with the rights of workers to express themselves freely, nor their right to access information, which enable them to perform their work properly.

7. Protection from discrimination: Company employs on the basis of job requirements and does not discriminate on grounds of age, ethnic or social origin, gender, sexual orientation, politics or religion.

1. Age:
Company will not discriminate, directly or indirectly, based on the age of the person. Company will ensure not to treat anyone less favorably because of their actual or perceived age.
2. Gender:
Company will not discriminate on the basis of gender on any aspect of employment (hiring, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment) and will establish employment targets to maintain gender balance.
3. Marital Status:
 - i. Company will not discriminate because of marital status (i.e. single, married, in a de facto relationship, separated, divorced or widowed).
 - ii. Company will treat fairly and not ask discriminatory questions that point to marital status or family issues.
 - iii. Men & women, without any limitation, have the right to marry as per the local laws.
4. Differently abled:
 - i. All differently abled will be treated with dignity and respect.
 - ii. Company will provide necessary facilities that should be available to disabled people that include blind, partially blind and handicapped (whether physically or mentally).
 - iii. Company will not do such things, which expose differently abled to undue hardships (for eg: asking them to lift heavy objects etc.)
5. Race:
 - i. Company will not tolerate any racial harassment like racial slurs, offensive or derogatory remarks about a person's race or color, or the display of racially- offensive symbols.
 - ii. Sensitivity to traditions/ cultural aspects needs to be ensured.

6. **Regional origin and ancestry:**
Company will not discriminate on the basis of origin/ancestry on any aspect of employment (hiring, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment).

Company will allow workers to speak their own language in the workplace when this does not interfere with their ability to fulfil their job responsibilities or adversely impact workplace health, safety or security.
7. **Indigenous/regional status:**
Company will respect language, culture and values of indigenous people.
 - i. Company may engage in positive discrimination towards indigenous people for vocational training, employment and education.
 - ii. Company will strive to achieve the free and informed consent of indigenous people to proceed with developments.
 - iii. Special arrangements may need to be made to accommodate and protect the prevalent traditional systems and beliefs.
8. **Personal beliefs:**
 - i. Company respects the practice of faith by its stakeholders.
 - ii. Company does not prevent employees from wearing clothing or other symbols that are an expression of their faith, provided that such clothing or symbols do not increase the risk of accidents in the workplace and do not interfere with their ability to perform their job responsibilities.
9. **Religion & Spiritual practice–** In respecting this right, Company will ensure:
 - i. To reasonably accommodate an employee’s religious beliefs or practices, unless doing so would cause more than a minimal burden on the operations of the business.
 - ii. No offensive remarks about a person’s religious beliefs or practices
10. **Political affiliation:**
As per Sun360 Code of Conduct & Ethics (clause # 7), Company shall not support any specific political party or candidate for political office. While Company respects individual’s political affiliation or beliefs, any such activity should be done outside the Company premises and Company’s resources should not be used (e.g. Working hours, infrastructure, etc).
11. **Sexual orientation:**
Company will not collect data on sexual orientation. No discrimination will be made based on the sexual orientation of the person.
12. **HIV/AIDS:**

- i. **Compliance:**
The Company's policies on HIV/AIDS regarding its employees will, at a minimum, comply with all relevant Central and State legislation and the Company will implement all policies and directions of the Government regarding HIV/AIDS whenever issued.
- ii. **Safe and Healthy Workplace:**
It is the Company's objective that employees will have access to health services to prevent and manage HIV/AIDS.
- iii. **Non-discrimination:**
The Company will not discriminate against any employee infected by HIV/AIDS regarding promotions, training and other privileges and benefits as applicable to all employees. A HIV positive employee will be allowed to continue to work in his/her job unless medical conditions interfere with the specific job being done, in which case reasonable alternative working arrangements will be made; or the employee is incapacitated to perform his/her duties and is declared medically unfit by a medical doctor, in which case the employee will be assisted to rehabilitate himself/herself outside the Company.

8. Alignment of conduct of employees:

1. Formal HR training will be imparted to the employees in a phased manner. Using this training, employees need to understand the context of policy in a particular role.
2. Formally defined measures will be undertaken to align conduct of all employees on Human Rights related aspects.
3. Company will appoint an ambassador to drive this policy across the organization and ensure that any complaints/ feedback are acted on suitably.