

## Human Rights Policy

Version: 1

Dated: November 2022

### Policy Purpose

Tata Realty and Infrastructure Limited (TRIL) respects and supports fundamental human rights, dignity, and well-being of all our workforce, stakeholders and other value chain partners. We are committed to becoming a responsible real estate company and upholding human rights is vital to our operations. The human rights policy along with Tata Code of Conduct is reflective of our acknowledgement of fundamental rights of all and our commitment to protect the same.

TRIL shall do best to not only avoid activities that may contribute to violation of human rights but also address any violations in any form that may result from our operations, activities and business relationships.

### Alignment

This policy is guided & governed by Tata Code of Conduct, TRIL ESG Policy and wide range of national and international laws (ILO mandates, Modern Slavery act and Protection of Human Rights Act, 1993). TRIL strives to respect and promote human rights across our operations, in accordance with UN Guiding Principles (UNG) on Business and Human rights.

### Objective and Scope

The policy sets our expectations of all those who work with us and extends to all our employees, contractors, and other value chain partners as applicable. This policy shall be reviewed periodically for its suitability and updated as required by the ESG Committee.

### Policy Commitment

Tata Realty shall ensure compliance with all applicable laws, fundamental labour principles including no discrimination (based on race, caste, religion, colour, ancestry etc.), prohibition of child labour; forced labour, freedom of association and right to collective bargaining. TRIL also adheres to achieve our commitment by ensuring:

- 1. Adequate working conditions and labour standards** – TRIL ensures compensation to employees in compliance with prevailing laws, market standards and practices. To this end, TRIL shall
  - Ensure compensation of employees with respect to industry and local labour markets, and comply with relevant wage, work hours, overtime and benefits laws or prevailing industry standards.
  - Respect employee right to freedom of association and collective bargaining and ensure, they choose to do so without any fear of reprisal, intimidation and harassment.
  - Provide reasonable breaks, access to a restroom, rest facilities and potable drinking water at the workplace, and holiday leave as per legislation.
  - Provide training and development programs for employee skill enhancement and career growth.

- 2. Prohibition of Harassment and Discrimination** – TRIL aims to provide a safe working environment and prohibits any form of harassment (sexual and non-sexual) or discrimination. To this end, TRIL shall
- Prohibit all sorts of discrimination i.e., in hiring, promotion, compensation and workplace cultural practices based on race, caste, religion, colour, ancestry, status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other legally protected category.
  - Provide an environment free of harassment (sexual and non-sexual). Any such act shall be unacceptable.
  - Respect and support the human rights of the vulnerable, disadvantaged, and indigenous communities surrounding its offices and project sites.
  - Address issues by the policies procedures, and training related to prevent workplace discrimination and harassment.
  - Provide various social programs on health & education, infrastructure development, skill development, women empowerment, and employment for the betterment of the surrounding communities.
- 3. Child and forced labour** – TRIL ensures its non-involvement in human right abuses. To this end TRIL shall:
- Prohibit the involvement of child and forced/compulsory labour, adolescent, or bonded labour, including any form of human trafficking in the offices, branch offices and project sites. Also ensure that suppliers and partners prohibit the same in their operations.
  - Ensure that employees are free to resign.
  - Ensure that the company will refrain from retaining the personal papers of its employees (for eg - passport, Aadhar card, educational certificates etc).
- 4. Inclusion and diversity** – TRIL is committed to recruiting, retaining, and promoting highly talented individuals. To this end, TRIL shall:
- Provide an environment of equality and respect for all employees and contractors.
  - Not -discriminate based on race, caste, religion, colour, ancestry, status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other legally protected category.
  - Recruit and keep personnel from diverse backgrounds, as well as cultivate a warm, supportive atmosphere.
- 5. Customer and Employee privacy** – TRIL is committed to respecting and all confidential information of the company or associated parties. To this end, TRIL shall:
- Not disclose information to third parties without explicit consent of the stakeholders, unless required by law to do so.
  - Protect all the collected data through regular security upgrades.
  - Provide an optimal security system for preventing leaks.
  - Provide adequate employee training to ensure the safeguarding of sensitive information.
  - Ensure reporting of data breaches and policy violations.

- 6. Health and Safety** – TRIL upholds the highest degree of trust with its external stakeholders and places their health and safety as equally important to that of employees. It identifies both physical and mental health as important for all. Health and safety are core to our product's entire life cycle. To this end TRIL shall:
- Ensure commitment towards being injury free with Zero fatalities and accidents.
  - Train and Guide contractors on occupational health and safety.
  - Ensure appropriate PPE provisioning, and healthcare benefits for the contractors.
  - Ensure the use of safe systems and equipment for work.
  - Ensure a strong grievance and issue redressal in terms of product quality and business operations.
  - Plan and conduct impact and risk assessments of activities and product.
  - Ensure the health and safety of products by adopting various applicable certifications and monitoring compliances to the same.
  - Ensure health and safety of tenants, customers and the local communities surrounding our project sites.
- 7. Protecting rights in our supply Chain** – TRIL recognizes the role beyond direct operations and identifies means to promote adoption of labour rights and respect for human rights across value chain. To this end TRIL shall:
- Implement procedures, practices and assessments that identify risks of human right violation and seek to prevent and mitigate the same.
  - Support suppliers to reduce risk and adverse human rights impacts.
- 8. Implementation Procedure and Grievance Redressal Mechanism** – TRIL encourages all employees, suppliers, and partners to contact the office in case of any encounter with evidence of failure of TRIL's responsibility to avoid any harm of human rights or its involvement in a human rights issue. Human Rights form a critical focus area of TRIL's ESG strategy. To this end TRIL shall:
- Ensure commitment to uphold human rights within the operations and across value chain and conduct thorough due diligence of human rights risks.
  - Ensure no human rights violation by providing regular trainings and awareness sessions on the code of conduct and other company policies including this policy.
  - Ensure redressal of human rights violation by establishing procedure where stakeholders can post their concerns anonymously without any fear.

**Approved by the Executive Committee**