
HUMAN RIGHTS POLICY

1. Objective:

PTC India Ltd (PTC) recognizes that it is a part of the communities in which it operates. Our aim is to ensure community engagement through (listening, learning & considering) their views as we conduct our business.

2. We endeavour to achieve adherence to the human rights policy by:

a. Compliance with Labour laws:-

- i. Maintaining positive legal compliance with applicable constitutional and regulatory human rights requirements
- ii. Aligning our existing policies, processes and activities with our commitment to respect human rights, including those that apply to labour practices as per Indian Labour laws, including best practices of United Nations Global Compact (UNGC), International Labour Organisation (ILO).
- iii. Ensuring full compliance with applicable wage, work hours, overtime and benefit laws Abiding by all laws and regulations regarding pay practices and the classification of employment according to job level and status
- iv. Complying with applicable labour and employment laws.
- v. Abolition of Force Labour and Child Labour
- vi. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with the management and /or Human Resources
- vii. Committing to protect the data privacy of employees (Including ex-employees), customers and vendors. Our current data protection and privacy framework will be guided by our data privacy policy.
- viii. We do not disclose information to third parties without explicit consent of our stakeholders, unless required by law to do so and in conformity of Data Privacy Policy of the Company.

b. Continuous Engagement:-

- i. Creating awareness of the human rights amongst our employees at various levels of our operations through training and communication

- ii. Striving to create workplace in which open and honest communications among all employees are valued and respected.
- iii. Engaging with all stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities.
- iv. Developing goodwill, creating employment and economic opportunities in the communities that host our activities.
- v. Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks.

c. Providing diversity at workplace: -

- i. Valuing and advancing diversity, equal opportunity and the need to consider the rights of women and minorities; and associated special care and assistance, Assistance to persons with disability
- ii. Our diversity philosophy celebrates the common values that bring joy, happiness, energy and enthusiasm to the community and focuses on bridging differences by enhancing commonalities among the diverse work pool
- iii. To ensure diversity¹ of our workforce, PTC Limited provides equal opportunity to potential employees irrespective of caste, creed, color, gender, sex, religion, and nationality provided they fulfil its merit-based criteria. These systems and processes are monitored for compliance and subject to continuous improvement.

d. Committing to a harassment free workplace:-

- i. Maintaining workplace that is free from discrimination or harassment on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law.
- ii. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience.
- iii. Prohibiting all forms of harmful child labour, forced / trafficked labour including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking & abuse.

¹ Central theme of non- discrimination has been taken from HR Manual 3.2

- e. **Support and Respect for internationally proclaimed Human Rights:-** We are committed to upholding human rights in our workplace and within our sphere of influence
 - i. Develop and encourage a transparent and rights awareness approach in our business operations
 - ii. We have also designated senior official(s) for appropriate grievance redressal mechanism to report any human rights concerns and ensure that **No** reprisal or retaliatory action will be taken against any employee or stakeholder for raising concerns under this policy.

3. Freedom of Association: - Freedom of Association is a fundamental right as proclaimed in the Universal Declaration of Human Rights. The right of workers and employees to form and join organizations of their own choosing is an integral part of a free and open society provided it does not interfere in your business working.

- a. Our internal HR system & policy is adequately detailed for non-discriminatory treatment to all the employees.
- b. Our Nomination & Remuneration (N&R) Committee of the Board which takes due consideration of all the feedback to make future policies regarding the same. ²

4. Healthy and Safe Workplace:- We are primarily a service oriented Company and committed to provide for healthy workplace, compliance with applicable health laws and regulations, as well as internal requirements.

5. Grievance redressal mechanism:- Above standards are incorporated in related policies, processes and guidelines across all our business operations.

- a. We believe that an empowered workforce is the best way to receive feedback and identify improvement areas.
- b. No reprisal or retaliatory action will be taken against any employee or stakeholder for raising concerns under this policy. We investigate, address and respond to the concerns and take appropriate corrective action in response to any violation.
- c. To address employee concerns and complaints pertaining to human rights and decent labour practices, a Grievance Redressal mechanism is in place. It allows for open and

² It is not in sync with our HR Manual 6.8. This has been put in specifically to factor in UN Declaration.



structured discussions on grievances raised on these issues and their resolution in a fair manner.

- d. We maintain a "Zero Tolerance" approach to Sexual harassment. The same is elaborated in Anti-Sexual Harassment Policy.

6. Actions and Procedures we undertake to meet our commitment:- Our progress on aspects of Human Rights is owned by the Business and Functional leadership team and is under the review and oversight of our Board of Directors. We identify and manage Human Rights impacts, risks and opportunities that continuously help strengthen our workplace policies, practices, and programs. To ensure that we meet our commitments related to human rights we undertake Training and Implementation of all policies and process related to Human Rights.

- a. We have defined our Human Rights Policy and of Code of Business Ethics for employees which cover all aspects of Human rights.
- b. We work with our employees on regular basis by providing them training on these aspects.
- c. We have robust mechanisms in place which help employees raise issues if they see violation of human rights at any level.
- d. Supplier level – We are implementing **Sustainable Procurement Policy** with all defined aspect of Human rights.

7. Compliance of the Human Rights Policy: - Employees are expected to comply with this and all applicable PTC policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities. Specific to this policy, employees are expected to "never infringe on human rights in our direct operations or in the operations of our business partners and report any situation in which a human rights infringement is suspected."
