



Human Rights

HUMAN RIGHTS

PURPOSE OF THE DOCUMENT

This position statement sets out HZL's approach to managing human rights. In recent years, ensuring that human rights are not being impacted has been a significant objective for the mining sector and a key aspect of sustainable development. Extractives companies have a significant impact on the locations where they operate. A failure to engage with appropriate stakeholders can result in severe human rights impacts, potentially risking a business's social licence to operate. Issues such as discrimination and racism are at the forefront of social consciousness, with corporations and other global organizations renewing their commitments to address social issues. The most salient human rights issues commanding corporate attention in the mining sector are health, safety and well-being, modern slavery and child labour.

There is a significant amount of emerging national and regional legislation requiring companies to disclose that they identify, prevent and mitigate impacts on human rights, and to indicate how they address potential impacts on human rights. Organizations such as the International Council on Mining and Metals (ICMM) are fully supportive of the United Nations Guiding Principles (UNGP) on Human Rights, and were deeply involved in the consultations that led to their development.

OUR IMPACTS

Human Rights issues are also characterised by the sector in which we operate as natural resources usually are in some of the core areas of the country that has traditionally been a home of indigenous peoples or ethnic minorities. While, we haven't located any such communities residing adjacent to our business operations, we hold great value in assessing the impacts of some of these issues in our current as well as future investments. In addition, we also understand that some of the human rights issues are linked to workforce, which we appoint through third-party contractors. Ensuring the rights of labour and workforce is not violated is one of the critical business processes we apply. We extend these processes across the value chain to ensure that nowhere, and nobody's rights get violated because of business relationships with HZL.

Also, with external scrutiny on human rights intensifying over the recent years, HZL gives utmost importance to establishing right processes for upholding people's fundamental rights while carrying out everyday business.

Commitments

We recognize that the nature of mining activities, whether in exploration, construction, operation or closure, create the potential for a wide range of human rights risks and we work to mitigate those risks. We are committed to improving

systems for identifying potential human rights issues/risks and to managing and resolving these issues/risks and any human rights-related incidents, impacts and grievances. Where we have caused or contributed to adverse human rights impacts, we will contribute to their remediation.

HZL is supportive of voluntary measures such as ICMM's principles, UNGP and ensures that these measures are integrated into business activities, including in social and environmental management, health and safety, supply chain security and human resources. We are committed to respecting and observing all human rights, as articulated in the Universal Declaration of Human Rights; the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization (ILO) Core Conventions. As adopters of the United Nations Guiding Principles on Business and Human Rights (UNGPs), we are committed to respecting the rights of our employees, the communities in which we are active, and others affected by our activities. We have zero tolerance for any form of Forced & compulsory labour, Child Labour, Slavery, Human Trafficking and Discrimination. We respect the rights of employees to associate freely and exercise collective bargaining. We are committed to transparently disclosing on our approach to manage human rights related challenges and opportunities concerning our workforce as well as local communities. We have adopted the UN Guiding Principles Reporting Framework to report on how we respect human rights in line with the Guiding Principles, and will use this framework to disclose our performance annually through our Sustainability and Integrated Reports.

Partnerships

We are committed to respecting human rights defenders, and we do not condone any form of attack against them or anyone who opposes our activities. We expect our business partners to share this commitment and to implement practices that reflect a respect for these human rights. HZL works with numerous local, national and international organizations and programs to support human rights.

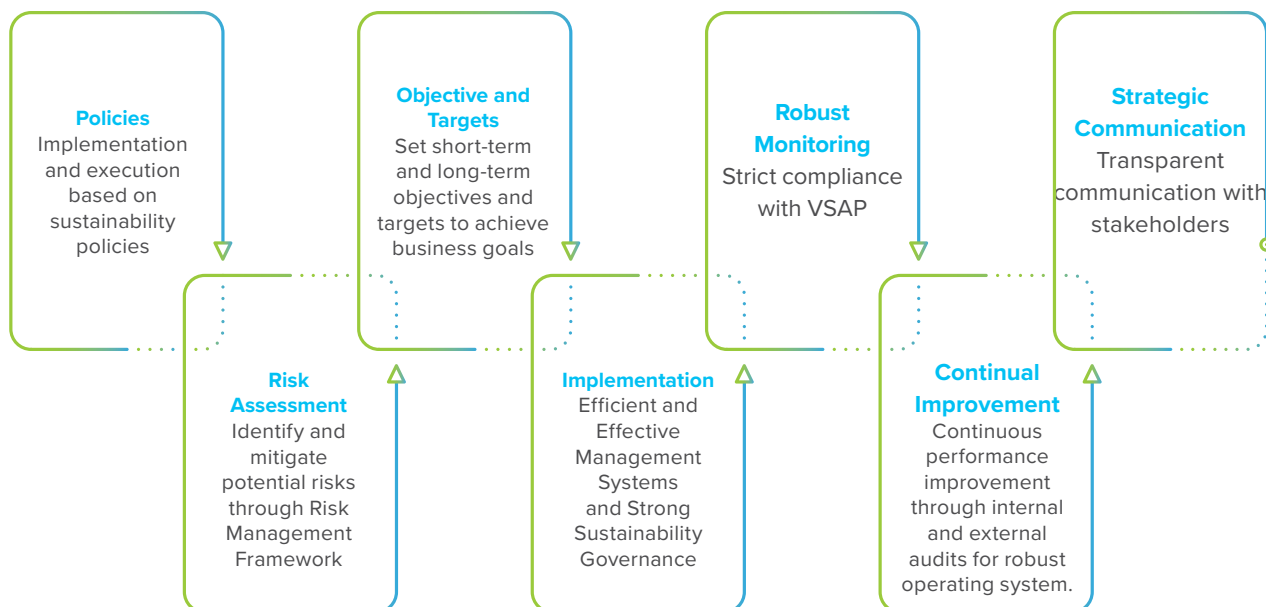
Our commitment to respect human rights of all our stakeholders as per the United Nations Declarations on Human Rights and Modern Slavery Act

Our commitment towards International Council on Mining and Metals (ICMM) Principles: A global industry association that represents leading international mining and metals companies who are required to implement the ICMM 10 Principles, including Principle 3 on respecting human rights

Our association with Federation of Indian Mineral Industries (FIMI): Promotes the development of India's mining and mineral processing industry; FIMI represents member companies on key mining related initiatives

SUSTAINABILITY MANAGEMENT FRAMEWORK

Our Sustainability Management Framework is aligned with both, the Vedanta Sustainability Framework (VSF) and the Integrated Management System (IMS).



Our commitment to United Nations Global Compact (UNGC): Provides a framework for businesses committed to aligning their operations and strategies with 10 principles spanning human rights, labour, the environment and anti-corruption

Our commitment to UN Guiding Principles on Business and Human Rights: HZL's Human Rights programming and reporting have adopted this framework

Our alignment towards Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises: Includes voluntary principles and standards for responsible business conduct that address a variety of issues, including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition and taxation

Further information related to our commitments and management approach towards our impact on people can be found in Our Approach to Health and Safety and Our Approach to Social Performance

Governance

The Board Level Sustainability and ESG Committee is aligned with our Human Rights commitment and facilitates our efforts towards the accomplishment of our 2025 goals and Environmental, Social and Governance priorities.

The committee is led by an independent director as the chairperson of the committee. The role of the Sustainability and ESG Committee is to assist the Board in meeting its responsibilities in ESG matters and to ensure a strong governance on sustainability matters. It is also responsible for

providing oversight on sustainability strategy, setting long-term goals & targets, ensuring continual improvement of our sustainability related performance as well as implementation of appropriate processes and policies across the Company. It also plays a key strategic role in eliminating potential damage to the environment and enhance our commitment towards stakeholders.

The Board Committee is supported by the Executive Sustainability Committee at the corporate level, chaired by CEO and includes senior executives to oversee delivery of the programs. The Executive Committee is tasked with ensuring that social risks are identified, acted upon throughout the lifecycle of the project. The Committee is also meant to oversee the resolution of all grievances in a timely manner. The ESC consists of multi-functional representation of senior leaders.

The Company has an Internal Complaints Committee to address the issues relating to human rights impacts or issues caused or contributed to by the business.

Policy & Standards

Our commitment to human rights is integrated into our daily operations through the following external commitments, policies, and standards:

- Our **Human Rights Policy** which covers all our suppliers, contractors, and NGOs, as well as business partners.
- Our **Business Ethics and Code of Conduct**.
- Our **Supplier and Contractor Sustainability Management Policy**.
- Other internal policies, procedures, and programs that covers aspects of Environment, Health and safety, and Community relations.



Vedanta Sustainability framework has a detailed standard and guidance note for Human rights and its compliance and all SOPs are aligned to this guidance note. In addition, our Human Rights management is supported by

Technical Standard on Security Management- Ensures management of security risks to its personnel and physical assets,

Technical Standard TS4 on Grievance Mechanisms- provides direction and guidance to sites to have a complaints, disputes, and grievance redressal mechanism system, and

Management standard on Incident Reporting and Investigation- provides direction and guidance to sites and corporate Security on dealing with security incident reporting and investigation

The **Vedanta Sustainability Assurance Programme (VSAP)** is a sustainability risk assurance tool, used to assess the compliance of all our units with the Vedanta Sustainability Framework. The assurance model has various modules, covering environment, health, safety, community and human rights elements. The assurance system works on the premise of tracking corrective and preventive actions by each of our businesses, and commissioning periodic formal audits by external experts. Based on the gap assessment, our businesses undertake management plans and corrective actions, with periodic review, evaluation and documentation. This aids in identifying the weak areas and promotes cross-functional working environment.

Our Cultural Heritage Standard Indigenous Peoples Standard ensure our operations align with community norms and values, which is integral to protect human rights and preserve cultural heritage assets.

STRATEGY TO MANAGING HUMAN RIGHTS ACROSS THE LIFECYCLE

Human Rights Risk Assessment & Due-Diligence Feasibility, Planning and Design stage

Incidents or actions by HZL that result in the community or other key stakeholders not granting the support we need to operate is a significant business risk. Events that harm the health and safety of the community, missed community expectations in areas such as local employment and socio-economic development, can all impact our ability maintain social acceptance. Our structured global Environment & Social Risk Assessment (ESIA) System includes a hierarchy of guidelines and procedures to assess the full range of environmental & social risks, regulatory requirements and obligations. Our Environment & Social Risk Assessment (ESIA) Standard requires each operating site to conduct an environment and social impact assessment at the beginning of the project, or during expansion/operational changes — which provides critical information about social baseline conditions and potential impacts of our business activities. These assessments include extensive input and review

from the communities through a formal public consultation process.. Findings from the studies are addressed through social management plans that aim to mitigate and minimize impacts while enhancing the benefits associated with mining activities. Other performance standards — including those that address human rights, Indigenous peoples, land acquisition and resettlement, and cultural heritage — establish the minimum requirements for managing our social risks and opportunities. Sites are regularly audited to ensure conformance to our standards and to promote continuous improvement. This process is linked to our overall approach to managing risks which is monitored at the enterprise level.

In our operations

HZL supported the United Nations Guiding Principles on Business and Human Rights. We conduct a surveillance audit and performed a systematic periodic review of the risk mapping of potential issues under the Vedanta Sustainability Framework, which has a detailed standard and guidance note (GN-12) for human rights compliance. We proactively and systematically identify potential human rights impacts through the Vedanta Sustainability Assurance Programme (VSAP). The identified risks are discussed and reviewed by the leadership teams, and action plans are put in place to ensure adherence to our commitment to Human Rights. We identified the groups at risk of human rights issues, i.e., our employees, third-party employees, local communities, women, and children. We ensure that our operations are not complicit with the issues related to Forced labor, human trafficking, Child labor, Freedom of association & collective bargaining, and Discrimination, including Migrant workers and Third-party contracted labor. During the year, we extensively assessed our current readiness and compliance with human rights rules and policies across the Company.

WE CONDUCT THE ASSESSMENT IN RESPECTIVE LOCATIONS FOR

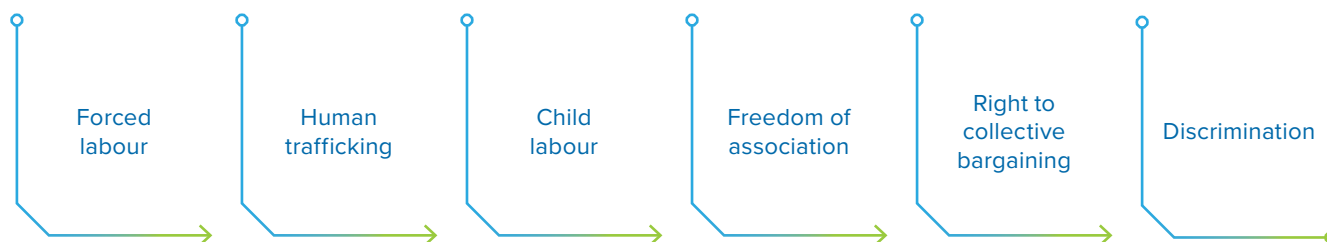
Identifying the risk areas

Formulating the mitigation plan for those highlighted areas.

HZL identifies human rights risks through UNGC human rights self-assessment tool, which is used to review and update salient human rights at HZL. As a part of the review of human rights self-assessments, we identify and prioritize the most significant human rights risks to individuals throughout our value chain so we can better focus our policies and programs that have the biggest impact on people affected by our business activities. During the year, we used the Global Compact Self-Assessment Tool developed by the Danish Institute for Human Rights, the Confederation of Danish Industries, the Ministry of Economic and Business Affairs and the Danish Investment Fund for Developing Countries - the tool assesses our performance against five key categories - Management. Human Rights, Labour, Environment and Anti-corruption.

Sites assessed

Potential human rights risks assessed:



100% sites were assessed for risks related to Human Rights. None of the sites were identified with potential human rights risks. Therefore, no mitigation plans were developed. However, as part of the human rights standard implementation, several measures were undertaken which are listed in the table below.

In our supply chain

Human rights are an important part of the supplier onboarding process, and all suppliers are required to commit to our Supplier Code of Conduct, which includes human rights provisions. We conduct due diligence of our critical suppliers, new suppliers and subcontractors. We appointed a third party for desktop and on-site risk mapping assessment of selected vendors. We conduct basic due diligence on suppliers in the pre-qualification process, including human rights issues, before signing a contract. We track human rights compliance at every step, from document verification at registration to screening and inspections for vendors/suppliers. The identified risks during the due diligence process are addressed through corrective and preventive action plans.

If any violation of our Human Rights policy is found, disciplinary actions including and up to termination of employment or contracts depending on severity of violation, will be undertaken.

Mitigation and Remediation Plan

Key Risk	Management Approach
Local Communities	Rajasthan being our operating area, we are committed to respect and preserve the norms, culture, and heritage of local communities by abiding by our standards which includes Cultural Heritage Standard, Land & Resettlement Management Standard, and Indigenous People and Vulnerable Tribal Groups Standard. These standards are aligned with ICMM guidelines & IFC Standards. Also, we have identified that there are no indigenous people nearby our operating areas.
Direct & Indirect Workforce	Our Code of Conduct policy provide awareness to employees on human rights aspects. Training on HZL's human rights expectations as laid out in our Code of Conduct Policy, are part of the induction training program. In addition, we provide trainings to our workforce on how to identify potential human rights issues within their activity areas as well as raise concerns if any violations are identified in the business and value chain activities. Robust mechanisms like employee grievance processes, collective bargaining and contract Labour management cells are in place at all our operations to ensure that employees are in a position to bring human rights concerns to our attention.
Freedom of Association and Collective Bargaining	We fully recognize the rights of our employees to freedom of association, to collectively bargain. The collective bargaining agreements are negotiated and agreed by the management and union representatives. These agreements include clauses relating to remuneration, allowances, working conditions, incentives and bonuses, health and safety, manpower productivity, etc.
Security Practices & Training to Security Staff	- We provide enhanced specialist human rights training for our security staff.. We emphasize that none of our operational procedures violates the human rights of any individual. The curriculum and module that is being followed by all HZL units lays tremendous stress on human rights training of security personnel. - We generally work with private and professional security companies (rather than local security forces or military) and our security personnel are not typically armed. Till date, we have not experienced any significant human rights abuses involving our security personnel.

Key Risk	Management Approach
Due Diligence Across the Value Chain	- Human rights are an important part of the supplier onboarding process, and all suppliers are required to commit to our Supplier Code of Conduct, which includes human rights provisions. - We track human rights compliance at every step of any activity – right from document verification at registration, to screening and inspections for vendors / suppliers. - We also conduct basic due diligence in the pre-qualification process, including for human rights issues, on all direct suppliers before contracting with them. Supplier and Contractor Technical Standard includes a Supplier Screening Checklist to evaluate contractor compliance relating to key issues. - Any concerns identified during the due diligence process are addressed through corrective and preventive action planning. Further, any concerns raised by interested parties on any of our key suppliers are promptly addressed by undertaking an independent assessment.

GRIEVANCE MECHANISMS

HZL demonstrates its corporate commitment to remedy through effective implementation of its site-based feedback mechanisms. Every unit has a Grievance Redressal Committee wherein any employee/worker can register any kind of grievance. The grievance can be captured through various means. There are grievance boxes available at conspicuous places where the person can post his grievance and the committee takes it up as per the procedure. We also have a Whistle Blower Policy in place and aims to fully protect the confidentiality and anonymity of the complainant possible with an objective to conduct an adequate review.

Company respects the dignity of all employees working for the Company irrespective of their gender or hierarchy and expect responsible conduct and behaviour on the part of all employees at all levels. Providing for a safe and congenial work environment to all employees is an integral part of the Company's employment policy. In addition, collective bargaining and contract labour management cells are in place. The Policy prohibits retaliation against any person reporting a concern in good faith, or participating in an investigation relating to a concern. This also serves as a practical measure to prevent intimidation of defendants of human rights. We encourage community members to bring forward concerns and feedback, including those related to human rights, through our site-level feedback mechanisms

Community incident procedures continue to be embedded in HZL's incident reporting processes. In all environmental incidents, community-related impacts and consequences are considered. Depending on the severity of the incident, an in-depth root cause analysis of the incident may be conducted. Where the incident has a perceived or actual impact on human rights, appropriate expertise is made available to the site to investigate and manage any potential impacts.

We have developed an online grievance system through the "Nirvana" portal to protect human rights. We have also placed a grievance box on the site gate for our stakeholders to drop their grievances.

We worked to ensure appropriate management and remedy of negative feedback and significant incidents, through continual improvement of our feedback mechanisms and the reporting and management of incidents. This included a specific focus on improving tracking and reporting of grievances through reporting practices.

SECURITY AND HUMAN RIGHTS RISK MANAGEMENT

Hindustan Zinc is dedicated to integrating human rights considerations into our security management practices. Our strategy includes:

- Training and Sensitization:** Providing training for both private and public security personnel conducted by in-house certified Master Trainers. This includes awareness sessions on the Voluntary Principles Initiative for stakeholders.
- Enforcing Guidelines:** Implementing stringent guidelines on the use of force and limiting the presence of armed security personnel on our premises.
- Collaboration with Stakeholders:** Working with external security partners and local authorities to advocate for human rights principles and ensure compliance with our human rights policy, as specified in contracts.
- Support for High-Risk Sites:** Extending corporate security support to high or critically at-risk sites to safeguard human resources and assets while adhering to human rights measures as outlined in the Voluntary Principles Initiative.

We are also supporting the Voluntary Principles on Security and Human Rights (VPSHR) and have applied for membership. Training for Master Trainers on VPSHR has been conducted through Rashtriya Raksha University, and we are in the process of hiring a subject matter expert to further enhance our practices.

COMPREHENSIVE SECURITY MEASURES

Our approach involves:

- **Security and Human Rights Reviews:** Regularly reviewing security and human rights practices to ensure compliance with the Voluntary Principles.
- **Armed Guards Deployment:** Evaluating the deployment of armed guards and assessing associated risks.
- **Incident Reporting and Investigation:** Maintaining robust systems for incident reporting and fair investigation to adhere to human rights standards.
- **Engagement and Assessment:** Engaging with local authorities, police, community leaders, and other stakeholders to deepen our understanding of security and human rights issues. This includes annual site security risk assessments to identify potential risks related to the misuse of force, weapons, and firearms.

Both in-house and external auditors conduct these assessments to ensure that our security practices remain compliant with the highest standards of human rights and operational integrity.

SECURITY RISK ASSESSMENT AND SUPPORT

Hindustan Zinc leverages security risk assessment results to enhance our security and human rights management:

- **Identifying High and Critical Risk Sites:** We pinpoint sites at high and critical risk of security and human rights violations.
- **Monitoring and Supporting Sites:** We monitor these sites closely and provide necessary support for implementing control measures.
- **Prioritizing Efforts:** Our approach ensures that resources and support are directed where they are most needed, based on risk assessments.

TRAINING AND COMMUNICATION

Our commitment to human rights is reflected in our training and communication strategies:

- **Tailored Training:** Every year, security personnel receive specialized training focused on the Voluntary Principles Initiatives on human rights. This training is designed to enhance their understanding and adherence to human rights provisions.
- **Operational Procedures:** We enforce strict operational procedures that prioritize the safeguarding of human rights. Our training curriculum emphasizes human

rights education and is conducted in collaboration with private and professional security companies rather than relying solely on local security forces or military personnel.

- **Unarmed Personnel:** Our security personnel are typically unarmed, and we have not encountered significant instances of human rights abuses involving them.

INTERACTIONS WITH PUBLIC SECURITY

Collaboration with government and public security officials is a key component of our Annual Business Plan for Corporate Security Services. Our engagement spans national, state, and district levels, aimed at:

- **Gaining Support:** Building relationships to secure support for our security and human rights initiatives.
- **Exchanging Best Practices:** Sharing insights and practices related to security and human rights compliance.
- **Enhancing Cooperation:** Fostering mutual understanding to improve overall security measures and ensure regulatory adherence.

INTERACTIONS WITH PRIVATE SECURITY

Hindustan Zinc partners with private security firms to manage our security operations. Our approach includes:

- **Structured Review and Engagement:** Maintaining a structured review matrix involving management from both our organization and security business partners. This helps address security management aspects and resolve any concerns.
- **Service Audits:** Regular audits by both in-house and independent auditors to ensure that services meet compliance standards and contractual obligations.

MONITORING SECURITY PROVIDERS

To ensure compliance with the Voluntary Principles Initiatives and our internal rules of conduct:

- **Regular Monitoring:** We conduct ongoing assessments of security service providers through structured engagement matrices and service level agreements (SLAs).
- **Effectiveness Measurement:** Security providers are evaluated monthly using scorecards administered by business units. These evaluations are also audited by in-house and independent auditors.



GRIEVANCE MECHANISMS FOR SECURITY FORCES

We have implemented a comprehensive grievance mechanism for security personnel:

- **Reporting Channels:** Security personnel can report grievances in writing, during briefings, or anonymously.
- **Investigation and Resolution:** All grievances are thoroughly investigated and addressed to ensure resolution and proper closure.
- **Human Rights Violations:** Reports of human rights violations by security personnel are handled through a confidential, multilingual whistleblowing service. This system allows for independent reporting and ensures fair investigation and consequence management.

AUDIT AND ASSESSMENT OF SECURITY CONTRACTORS

Under the supervision of the Management Assurance Services of the Vedanta Group:

- **Structured Audit Process:** A well-defined audit and assessment process for security contractors is in place. This process involves annual evaluations by a reputable third-party auditor.
- **Reporting:** The audit report, assessing the effectiveness and performance of security contractors, is presented annually to business unit heads, senior management, and the Audit Committee of the Board.

These measures ensure that our security management practices adhere to the highest standards of human rights and operational excellence.