

Human Rights

(GRI 402-1, 407-1, 410-1, 412-2) FIMI Principle-6, 7)



Upholding people's fundamental rights is central to our everyday business operations. We are, at the very least, committed to complying with all applicable local, state and national laws regarding human rights and workers' rights in regions of our business. We have zero tolerance towards any form of forced or compulsory labour, child labour, slavery and human trafficking. All employees are required to comply with our Human Rights Policy, which also covers all our suppliers, contractors, joint ventures and NGOs, as well as business partners. The Policy is aligned with the UN's Guiding Principles on Business and Human Rights.

Local Communities

We operate in diverse area of Rajasthan, and our respect for the norms, culture, and heritage of local communities is unwavering. We adhere strictly to the various standards we have laid down in this regard, including the Cultural Heritage Standard, Land & Resettlement Management Standard, and Indigenous People and Vulnerable Tribal Groups Standard. The standards are aligned with international practices, including ICMM guidelines and IFC standards. Our CSR teams help ensure that there is no violation of human rights, local cultural norms and heritage. However, there is no indigenous people as community around our neighborhood.

Direct & Indirect Workforce

We maintain cordial and constructive relations with all employees and labour unions. Non-compliance to the provisions of the Human Rights Policy and standards is severely dealt with. We also have a Code of Conduct policy to educate our employees on various human rights aspects. We train our workforce on identification of potential human rights issues within their activity areas, and also promote awareness on raising concerns/escalation of human rights issues if identified in the business and value chain activities. We have robust mechanisms, such as employee grievance processes, collective bargaining and contract labour management cells, at all our operations. In line with the UK Modern Slavery Act, 2015, we expect our suppliers to work with transparency in human rights practices, and take responsibility for

compliance with respect to managing the modern slavery risk. We ensure there is no discrimination between the employees and labour unions, with equal involvement of both in trainings, gatherings or functions and meetings.

Collective Bargaining

We uphold our workers' right to freedom of association at all our operations. Collective bargaining agreements are negotiated and accepted by the management and union representatives. The agreements include clauses relating to remuneration, allowances, working conditions, incentives and bonuses, health and safety, manpower productivity etc. We aim to ensure that compensation for workers' meets or exceeds the legal requirements. Collective bargaining also gives us the opportunity to create a better and more productive work environment.

Security Practices and Training of Security Staff

Under our Code of Conduct Policy, we provide our employees with training on our human rights expectations as part of their induction training program. Enhanced specialist human rights training is provided to our security staff. The employees who receive this training range from our on-site security guards to our transport workforce. We focus on ensuring that none of our operational procedures violate the human rights of any individual. Based on our curriculum and the module followed by all Hindustan Zinc units, we lay tremendous emphasis on human rights training of security personnel, working with private and professional security companies (rather than local security forces or military). Our security personnel are not typically armed, and we have not experienced any significant human rights abuses involving them.

Due Diligence Across the Value Chain

We encourage suppliers/business partners/joint ventures to adopt principles and practices comparable to our own. Our due diligence process covers own operations, joint ventures and activities related to our business. It is undertaken through inductions, screenings, inspections and audits. For any of our new projects or

significant changes to existing operations, human rights at Hindustan Zinc, upholding people's fundamental rights is central in our everyday business operations. At a minimum, the Company will comply with all applicable local, state and national laws regarding human rights and workers' rights where the Company does business. All our businesses are compliant with applicable regulations, strive to uphold all labour rights and are aligned with national and international regulations. The clauses of the Code of Conduct are extended to all business partners. All units are required to evaluate human rights aspects covering forced and compulsory labour, child labour, slavery, human trafficking, freedom of association or collective bargaining etc., into their assessments (through social impact assessments). Our significant suppliers and contractors generally include well-reputed and well-governed organizations, with robust human rights and fair practice mechanisms. 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 also conduct basic due diligence in the pre-qualification process, including for human rights issues, on all direct suppliers before contracting with them. We track human rights compliance at every step of any activity – right from document verification at registration, to screening and inspections for vendors / suppliers. 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.

Child Labour Violations

The Suppliers' Code of Conduct is implemented as part of the terms and conditions of supplier contracts across Hindustan Zinc, and all new suppliers are required to sign, endorse, and practice this Code. We also have in place a Supplier & Contractor Sustainability Management Policy, which, coupled with the Code, clearly communicates our expectations from our suppliers: to operate in compliance with all relevant legislations and follow our policies while executing work for or on behalf of Hindustan Zinc. The Supplier and Contractor Technical Standard further includes a Supplier Screening Checklist to evaluate contractor compliance relating to key issues, e.g. legal compliance, HSE management, labour management, human

rights and child labour. This checklist is used to screen suppliers and contractors as part of the pre-qualification process. At the time of engaging new suppliers, the contract mandates the supplier to abide by the law of the land and ensure that there is no violation of labour laws. Checks are also carried out to ensure adherence to labour practices at various levels.

Ensuring Right Age for the Right Job

We take utmost care to ensure that our workforce, be it executives or contract employees, are adults and willing to work. We have proper systems in place to strictly check child labour and forced labour across all our operations. Our Suppliers' Code of Conduct stipulates that all our suppliers also commit to the same norms.

Management Approach

The Vedanta Sustainability Framework has a detailed standard and guidance note (GN-12) for human rights and their compliance, and all SOPs are aligned to this note. Through the Vedanta Sustainability Assurance Programme (VSAP), an internal risk management tool run by Vedanta's Management Assurance System team, we conduct gap analysis and identify any lacunae between current systems and processes with respect to human rights compliance. The identified gaps are discussed and reviewed by the leadership teams, and action plans are put in place to ensure compliance.

DISCIPLINARY ACTION – Violation of our Human Rights Policy will lead to disciplinary action, including and up to termination of employment or contracts, depending on severity.

Performance

- Trained 778 security personnel on Business Ethics and Human Rights, Modern Slavery Act (99.87% of staff trained)
- All employees completed the Code of Business Conduct e-module, covering Human rights aspect
- 2,587 employees (70%) of the employees covered in specific trainings conducted on human rights - 2,880 training manhours
- We have recognized trade unions at Hindustan Zinc, 100% of non-executives (1,157) and all contract employees (18,286) are part of these associations and collective bargaining agreement