

## Human Rights at HZL

Human Rights at the Company, 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. All employees are required to comply with our Human Rights Policy. Our Human Rights policy is aligned to the United Nations Guiding Principles on Business and Human Rights. The policy also covers all its suppliers, contractors, joint ventures and NGOs. The clauses of the Code of Conduct extended to all business partners.

### Local Communities

We operate in diverse area of Rajasthan and our respect for the norms, culture, and heritage of local communities remains strong as ever. We have developed several standards and abide by them. This includes the Cultural Heritage Standard, Land & Resettlement Management Standard, and Indigenous People and Vulnerable Tribal Groups Standard that have been developed in alignment with international practices including ICMG guidelines and IFC standards. However, around our neighborhood there is no indigenous people as community.

### Direct & Indirect Workforce

We maintain a cordial and constructive relation with all employees and Labour unions. There is zero room for human rights violations at our operations and any case of non-compliance is severely dealt with. We have Code of Conduct policy in place which educates our employees on human rights aspects. We train our workforce on identification of potential human rights issues within their activity areas and awareness on raising concerns/escalation of human rights issues if identified in the business and value chain activities. We have robust mechanisms like employee grievance processes, collective bargaining and contract Labour management cells at all our operations.

### Collective Bargaining

We uphold our workers' right to freedom of association at all our operations. The collective bargaining agreements are negotiated and agreed 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 in terms of health and safety, working conditions, remuneration, allowances, incentives and bonuses.

### Security Practices and training to Security Staff

We have Code of Conduct policy in place which educates our employees on human rights aspects. We provide regular training to our Security staff on code of conduct and human rights. The employees who received this training range from our on-site security guards to our transport workforce.

We emphasize that none of our operational procedures violates the human rights of any individual. Based on our curriculum and the module that is being followed by all HZL units, we have been laying a 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). Our security personnel are not typically armed, and we have not experienced significant human rights abuses involving our security personnel.

### **Due diligence across the entire 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 venture and activities related to our business. For any of our new projects or significant changes to existing operations, all our sites are required to evaluate human rights aspects 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. We continue to ensure due diligence for our suppliers and business partners by conducting inductions, screenings, inspections and audits. Any concerns identified during the due diligence is addressed through corrective and preventive action planning. Further any concerns raised by interested parties on any of our key suppliers is 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 HZL and all new suppliers are required to sign, endorse, and practice this Code. At Hindustan Zinc, we have a Supplier & Contractor Sustainability Management Policy. Both the Code as well as the Policy clearly communicate 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 by operations to screen suppliers and contractors as part of a prequalification process prior to awarding work. 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. In addition, checks at various levels are also carried out to ensure the adherence to Labour practices.

### **Ensuring right age for the right job**

At Hindustan Zinc, we take utmost care to ensure that our workforce, be it executives or contract Labour are adults and willing to work. We have proper systems in place to strictly address child Labour and coerced Labour across all our operations. Apart from this, we carry out periodic inspections at our remote mine locations, where proof of age is mandatory for all contract workers. Our Suppliers' Code of Conduct stipulates that all our suppliers also commit to the same norms.

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