



# HUMAN RIGHTS POLICY



## HUMAN RIGHTS POLICY

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## HUMAN RIGHTS POLICY

### **Introduction:**

At Ratnamani Metals & Tubes Limited ('**RMTL**' or '**we**'), we respect, promote and uphold human rights across all our internal and external stakeholders, including employees, customers, suppliers, value chain partners and the communities at large. Our commitment towards reinforcing human rights is in accordance with all the applicable labour laws in India and in line with global best practices as per International Bill of Rights, United Nations principles of protecting Human Rights, Modern Slavery Act, CEDAW Regulation and the International Labour Organization.

This Human Rights Policy ('**Policy**') reinforces RMTL's commitment to respecting human rights in each and every aspect of its business operations.

### **Policy Scope:**

This Policy sets forth the principles that govern our business conduct and is applicable to our direct and indirect operations including our subsidiaries, suppliers, vendors, dealers and business partners. Requirements for our suppliers and partners to respect human rights are also laid out in our Supplier Code of Conduct.

This Policy is applicable to all the directors, employees, associates, advisors, and all others acting on behalf of RMTL. It is also applicable when RMTL is dealing with government, public bodies, non-profit organizations, public representatives or officials, etc.

### **Principles:**

We are committed to respect all internationally recognized human rights and expect our suppliers, vendors, dealers and business partners to uphold the same, particularly including the following

#### ***Equal Opportunity and Non-discrimination:***

RMTL is an equal opportunity employer and strives to achieve a balanced approach to promote a workplace full of cultural diversity. RMTL does not tolerate any form of discrimination on the grounds of race, religion, gender, nationality, ethnicity, sexual orientation, age or disability.

All workforce related decisions and criteria on hiring, compensation, professional development and promotions, are determined solely on the basis of merit, qualification, capability and performance.

We provide training to all our employees without differentiation on the grounds of gender, age, physical disabilities etc.

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At RMTL, we believe that diversity and inclusivity is the key factor to generate growth and celebrate the uniqueness, thereby encouraging an environment of empowerment and inclusion.

### **Harassment Free Workplace:**

RMTL is committed to provide a work environment free from all forms of harassment, prohibiting both sexual and non-sexual harassment, whether physical, psychological, verbal or written.

At RMTL, we have zero tolerance for discrimination and harassment. For harassment to occur there does not have to be an intention to offend or harass. It is the impact of the behavior on the person who is receiving it, together with the nature of behavior, which determines whether it is harassment or not.

Any employee whether full-time or part-time may file a complaint or report a concern as per the process defined in our Whistle Blower Policy. Each reported allegation is taken seriously and handled confidentially. If allegations are confirmed, corrective measures are taken, which may include disciplinary action, dismissal, or legal action against the responsible employee(s).

### **Sexual Harassment:**

RMTL aims to provide a safe working environment and prohibits any form of sexual harassment. Any act of sexual harassment or related retaliation against or by any associate is unacceptable. In addition to this Policy, RMTL also has a Policy on Prevention of Sexual Harassment in line with the requirements of POSH Act. RMTL has also set up an internal committee in accordance with the POSH Act. In conjunction with the Policy on Prevention of Sexual Harassment, the Policy outlines the preventive measure taken and framework for dealing with complaints, if raised. Annual training on sexual harassment is also mandatory for the entire RMTL workforce.

A separate Committee is formed for the purposes of overseeing effective implementation of initiatives aimed at providing a safe working environment and preventing any instances of sexual harassment within RMTL.

### **Freedom of Association:**

The right to Freedom of Association is a fundamental right provided in our Indian Constitution as well as under the Universal Declaration of Human Rights. This right empowers the employees and workers to assemble, communicate, join and/or form organization or association of their choice.

At RMTL, we recognize the employees' right to assemble, communicate and join association of their choice in matters related to their employment. We respect the lawful right of employees to exercise freedom of association and engage in collective bargaining.

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### ***Equal Remuneration:***

At RMTL, our remuneration is based on competitive performance, skills, qualifications and in accordance to the standard market regulations and practice. We endeavour to ensure that all the employees of RMTL receive equal pay for equal work, irrespective of their gender or without any other biasness.

### ***Healthy & Safe Workplace:***

We at RMTL try to provide a safe, hygienic and healthy work environment free to our employees. We strive to provide a work environment that helps promote mental and physical well-being of our employees. We believe that a safe, hygienic and health work atmosphere promotes productivity and growth of the company.

We encourage all our employees to highlight concerns or health/security hazards to the management. Various training programs are also provided during the year to the entire workforce in relation to the health and safety aspects of our business operations.

We constantly try to provide a safe and healthy work environment to also ensure welfare of our associates. In order to make our associates aware of this Policy, we conduct various training and awareness programs.

### ***Promoting Growth and Development of the Employees:***

We at RMTL recognize that enhanced opportunities for growth and development of the employee in professional category is of utmost importance. We provide training to our employees to enhance opportunities for their internal growth, promotion and to enhance their job performance.

We ensure that all the training conducted at RMTL is without differentiation on grounds of gender, age or physical abilities. Our HR team offers industry benchmarked learning programs for development of the workforce. The HR team has many learning offerings and interventions including training on technical, managerial and process skills, industry domain knowledge and leadership skills for employees. In addition to above, the HR Team has tied up with various agencies for imparting such training to the employees.

### ***Workplace Flexibility and Security:***

We believe that having a workplace free from violence, harassment, and such other unsafe conditions provides a flexible work culture. We provide security safeguards for our employees, as and when needed, and are maintained with respect for employee privacy and dignity. Flexibility of work environment as well as maintaining security of the employee either professionally or personally helps RMTL retain its clientele and

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employees. Our flexible working hours includes benefits such as Maternity and Paternity Leave, Sick Leave, etc. During pandemic, we also offered Work from Home (WFH) thereby ensuring continuity of our services keeping and safeguarding health, welfare and safety of our employees into consideration.

### ***Prohibition of Child Labour and Forced Labour:***

We at RMTL do not employ any employee falling within the definition of child and/or who is below the age of 18 years. RMTL prohibits child labour and forced labour of any kind including bonded labour, human trafficking, and slavery across its operations.

This is also applicable to all our value chain partners and suppliers and is reinforced in our Supplier Code of Conduct.

### ***Data Privacy:***

RMTL is committed to protect data privacy of its employees, investors, customers, business partners and suppliers. We abide by all the applicable laws and industry standards and practice to safeguard data privacy. We do not share or disclose the data collected by us to any third party without the written consent of our stakeholders unless the same is required to be disclosed by law.

Our policy framework includes multi-layered password protected security system. In case of any data privacy or security breach issues, the employees at RMTL can raise the issue with the IT team.

### ***Human Dignity:***

RMTL is committed to treating each individual with equal respect and dignity irrespective of the position they hold. We respect the right of expressing disagreement, respect the time and efforts of others. We strive to nurture fairness, trust and transparency in our actions at RMTL.

### ***Communications:***

RMTL believes that communication is the key to success. We strive to provide a friendly workforce where communications with each other become easy and informal. We believe that the workforce can be best empowered by receiving feedbacks and discussing on the areas of improvement. RMTL ensures that all its employees are made aware of all the relevant laws, guidelines, policies as and when amended or updated from time to time. We make aware all these laws and policies to our employees when they join this organization and also give them periodic reminders during their employment. We communicate all the necessary and relevant information in regards to the corporate governance structure of our company, financial structure, other such policies and long-term growth opportunities with our employees.

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We conduct trainings to strengthen in-house awareness and education on the practice of human rights. We ensure that no reprisal or retaliatory action is taken against any employee or stakeholder for raising concerns under this Policy.

### **Grievance Redressal Mechanism:**

In order to address any issues/complaints from the employee pertaining to violations under this Policy, RMTL has established a team and also has a formal grievance redressal mechanism in place with appropriate procedure and system to assess any breach of this Policy.

Employees, dealers, suppliers and vendors can raise grievances and report confidentially and anonymously about any breach in the Policy, as per the process defined in our Whistle Blower Policy.

We take appropriate actions, steps and address the concerns with proper actions in response to any such violation taking place.

### **Review:**

This Policy is to be reviewed as and when any changes are required.