

INNOVA CAPTAB LIMITED

LABOUR AND HUMAN RIGHTS POLICY

Introduction:

Innova Captab Limited (Innova) is committed to respecting and upholding the human rights as a fundamental value. Through this Labour & Human Rights Policy (Policy), we intend to imbibe the spirit of Labour & human rights in all forms throughout our operations and business value chain.

This policy has been formulated upon the fundamentals of the Universal Declaration of Human Rights adopted by the General Assembly of the United Nations in 1948 that all human beings are born free and equal in dignity and rights. We express our commitment to promote respect for the rights and freedoms enshrined in the Declaration. Every employee is entitled to all the statutory rights and freedoms like freedom of association without distinction of any kind such as race, colour, sex, language, religion, political or other opinion, social origin, property, birth or other status.

Innova also commits itself and promotes "Fundamental Principles and Rights at Work" contained in the 1998 International Labour Organisation (ILO) Declaration namely:

- Freedom of association and the effective recognition of the right to collective bargaining;
- The elimination of all forms of forced or compulsory labour;
- The effective abolition of child labour; and
- The elimination of discrimination in respect of employment and occupation.

Innova ensures effective implementation of the human rights policy through relevant processes and procedures by assessing the company's human rights impacts and risk areas through stakeholder consultation, training, communication, management systems, communicating on how impacts are addressed and by establishing effective operational-level grievance mechanisms for individuals and communities that may be adversely affected by the company's activities.

Scope:

This policy applies to all employees of the company including contract labour and to all operational locations.

Innova commitments to labour and human rights:

Respect for Human Rights:

Innova respects human rights. Innova believes in sustainable business development and considers respect for Human Rights and the proper adherence to Labour Rights as an integral component of responsible business behaviour. The Company is also committed to identify, prevent, or mitigate adverse human rights impacts resulting from or caused by its business activities.

No Forced Labour and Human Trafficking:

Innova prohibits the use of all forms of forced labour, and any form of human trafficking.

No underage workers:

Innova prohibits the employment of individuals under the applicable statutory minimum age for workers which is 18 years.

Safe and Healthy Workplace:

Innova aims to provide all employees with a workplace which is healthy and safe, and free from all known health and safety risks. We observe all laws and regulations regarding employee safety.

Accident/medical emergency at work:

The death or disablement of employees due to any accident at workplace shall be paid statutory compensation. Employees injured at workplace shall be given prompt first-aid treatment at occupational health centre and depending upon the case, refer them to the notified hospitals for further treatment.

Anti-Harassment:

Employees of Innova shall be treated with dignity and in accordance with the Innova policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological and respect for the right to privacy and the right to be heard.

Work place harassment is defined as any action that inappropriately or unreasonably creates an intimidating, hostile or offensive work environment like unwelcome comments based on race, gender, religion or nationality. The officers should adhere to and facilitate effective functioning of the Company's mechanism for redressal of complaints of harassment of any nature as per established policies and principles.

Sexual Harassment:

Innova strongly disapproves all forms of sexual harassment which include any one or more of the unwelcome acts or behaviour (whether directly or by implication) namely- physical contact and advances or a demand or request for sexual favours or making sexually coloured remarks or showing pornography or any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

We provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment. An Internal Complaints Committee at workplaces under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has been constituted to hear the complaints of sexual harassment from aggrieved women employees.

Non Discrimination:

Equal Opportunity, Diversity and Inclusion - We strive to maintain an inclusive work culture in which each employee feels respected and valued and has the opportunity to develop and grow in line with business needs and personal aspirations. We offer all individuals equal opportunity to join the Company, and to progress within the Company according to performance and potential. We embrace employees from all possible backgrounds representing different dimensions of diversity which include gender, race, colour, religion, nationality, age, sexual orientation, disability, marital status, and other aspects of diversity. We aim to ensure that our workplace is free of all forms of discrimination, harassment, violence and other behaviours which might negatively impact the workplace experience, such as alcohol or substance-abuse.

Work Hours, Wages, and Benefits:

Innova compensates employees competitively relative to its industry and the local labour market. The Company's principle is to provide a living wage. We comply with all applicable labour laws governing wages, working hours, overtime and benefits. Innova attempts to prevent compulsory redundancies. In cases where these are unavoidable, the company will comply with applicable labour laws.

Freedom of Movement:

Employees are allowed to freely leave the company property after regular working hours. Security guards on duty shall not prevent any employee from leaving after regular working time. They may carryout personal searches if required in a discreet manner by respecting gender and privacy.

Vacation:

Employees may be allowed to go on vacation during their sanctioned annual leaves with wages.

Leaves due to sickness, workplace injury and maternity:

Employees covered under the statutory ESI scheme shall be protected against employment injury, sickness and maternity. Employees not covered by the statutory ESI scheme may be allowed leaves such as sickness, maternity and employment injury.

Freedom of Association and Collective Bargaining:

Innova respects its employees' right to join, form or not to join a labour union, seek representation, bargain or not bargain collectively in accordance with local laws and without fear of reprisal, intimidation, or harassment. Where employees are represented by legally recognized unions, we aim to have constructive dialogues with their chosen representatives and bargain in good faith with such representatives.

Redressal Mechanisms:

Our human rights and labour rights commitments are an integral part of our Innova business principles. We encourage our employees to address or report internal or external issues in line with internal reporting procedures. These assume reporting to immediate supervisor and also provide for other reporting options. 'Issues' can cover a very broad range of topics which include suspected violations in areas of bribery and corruption, conflicts of interest, free enterprise and fair competition, human rights, labour rights, discrimination, harassment in, and financial bookkeeping.

Stakeholders' engagement: Innova is conscious of the impact it has on the communities in which it operates. We constantly engage with stakeholders to ensure that we listen to, learn from, and consider their views as we conduct our business. We are committed to engaging in dialogue with stakeholders on human rights or labour rights issues related to our business where appropriate, taking the view that local issues are most appropriately addressed at the local level.

We work with outsourced vendors for the supply of our products and components which are manufactured and assembled to our specifications. In general, we cultivate long-term relationships with our outsourced vendors, who are familiar with our approach to human rights and labour standards. We strive to have our outsourced vendors and key suppliers confirm that they observe our practices which protect labour rights and human rights like prohibition of child labour and forced labour etc.

Qualitative objectives and/or Quantitative targets:

The qualitative objectives with respect to working conditions, remunerations, social benefits, labour relations, career management, child and forced labour, diversity, discrimination & harassment and external stakeholder human rights are mainly the objectives that are enshrined in the local labour laws. Innova seeks to comply with all labour laws that govern working conditions, remunerations, social benefits, labour relations, child and forced labour, sexual harassment etc., and uphold "Fundamental Principles and Rights at Work" contained in the 1998 ILO Declaration.

The quantitative targets in labour practices are as follows:

- 100 % coverage of all employees including contract labour under social security legislations.
- Total elimination of child labour and forced labour from all operations of the company with a recruitment policy that no person who has not completed 18 years of age shall be employed.
- Zero tolerance of all acts of harassment including sexual harassment.

Labour Broker Recruitment Fees/Deposits:

All labour contractors shall obtain licence under the law applicable to the employment of contract labour. The agreement between the principle employer and the contractor shall specify the wages and other benefits payable to the labour employed by contractor. The terms of contract shall be specified in the agreement.

Responsibility and Governance:

HR Representative nominated by the Management shall be the In-charge of the policy and responsible for the implementation and monitoring of the policy.

Communication of the policy:

The policy document shall be displayed prominently at all conspicuous places and be available in the public domain.

Review of the policy:

This Policy will be reviewed annually. If activities and operations change significantly, this policy may be updated outside the annual review.

A blue circular stamp with a star in the center and the text "CAPTAB" around the perimeter. Overlaid on the stamp is a handwritten signature in blue ink and the date "06-01-2024" written in blue ink.