

POLICY ON HUMAN RIGHTS

Version Number: 7.6



Policy on Human Rights

1. Objective

- To uphold dignity of every human being and respect individual rights as set forth by the articles in the Universal Declaration of Human Rights adopted and published by United Nations.
- To contribute to the fulfillment of human rights through compliance with laws and regulation.
- To support and respect the protection of human rights within the sphere of influence and ensure that we are not complicit in human rights abuses.

2. Coverage

All employees of the Company.

3. Guiding Principles

The Company and all its employees shall preserve the human rights of every individual and the community. Black Box Limited commits itself to abide by the following tenets/ articles and will ensure that it will not violate any of these human rights in any of its actions, intentions, policies and dealings with respect to people:

- All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.
- Everyone is entitled to all the rights and freedoms set forth in these articles without
 distinction of any kind, such as race, colour, sex, language, religion, political or other
 opinion, national or social origin, property, birth or other status. Furthermore, no
 distinction shall be made on the basis of the political, jurisdictional or international status
 of the country or territory to which a person belongs, whether it be independent, trust,
 non-self-governing or under any other limitation of sovereignty.
- Everyone has the right to life, liberty and security of person.
- No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.
- No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
- Everyone has the right to recognition everywhere as a person before the law.
- All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of these articles and against any incitement to such discrimination.

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- Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.
- No one shall be subjected to arbitrary arrest, detention or exile.
- Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.
- Everyone charged with a penal offence has the right to be presumed innocent until
 proved guilty according to law in a public trial at which he has had all the guarantees
 necessary for his defence.
- No one shall be held guilty of any penal offence on account of any act or omission which
 did not constitute a penal offence, under national or international law, at the time when it
 was committed. Nor shall a heavier penalty be imposed than the one that was applicable
 at the time the penal offence was committed.
- No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.
- Everyone has the right to freedom of movement and residence within the borders of each State.
- Everyone has the right to leave any country, including his own, and to return to his country.
- Everyone has the right to seek and to enjoy in other countries asylum from persecution.
 This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.
- Everyone has the right to a nationality.
- No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.
- Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
- Marriage shall be entered into only with the free and full consent of the intending spouses.
- The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.
- Everyone has the right to own property alone as well as in association with others.
- No one shall be arbitrarily deprived of his property.
- Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief inteaching, practice, worship and observance.
- Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.
- Everyone has the right to freedom of peaceful assembly and association.
- No one may be compelled to belong to an association.
- Everyone has the right to take part in the government of his country, directly or through freely chosen representatives.
- Everyone has the right to equal access to public service in his country.

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- The will of the people shall be the basis of the authority of government; this will shall be
 expressed in periodic and genuine elections which shall be by universal and equal
 suffrage and shall be held by secret vote or by equivalent free voting procedures.
- Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international cooperation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.
- Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- Everyone, without any discrimination, has the right to equal pay for equal work.
- Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
- Everyone has the right to form and to join trade unions for the protection of his interests.
- Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.
- Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
- Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.
- Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.
- Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.
- Parents have a prior right to choose the kind of education that shall be given to their children.
- Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.
- Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.
- Everyone is entitled to a social and international order in which the rights and freedoms set forth in these articles can be fully realized.
- Everyone has duties to the community in which alone the free and full development of his personality is possible.
- In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
- These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.



Nothing stated in these articles may be interpreted as implying for any person any right to
engage in any activity or to perform any act aimed at the destruction of any of the rights
and freedoms set forth herein.

4. Management Responsibility

To fulfil our commitment to abide by the aforesaid articles, the Company will:

- Proactively identify issues which could be in contradiction to human rights & resolve the same.
- Formally incorporate Human Rights policy into decision-making process.
- Introduce innovation in management, practices, products and services by incorporating the human rights dimension.
- Encourage dialogue & share experiences.
- Carry out internal training on human rights.
- Involve the Company's partners in respect for human rights.
- Communicate and explain the human rights policy to people.
- Ensure that all agreements with business partners, vendors & suppliers include the human rights clause and adherence to the same through periodic audits.
- Promote peaceful and mutually inclusive co-existence, irrespective of viewpoints, cultural backgrounds, or any other differences.
- Resolve conflicts amicably and practice collaboration.
- Support and encourage practices and processes aimed at fostering communal harmony and a spirit of oneness.
- Not discriminate against any employee or prospective employee on the basis of caste, colour, creed, religion, nationality, ethnicity, political orientation, social/ economic/ political status, marital status & distinguish among individuals on the basis of the country or territory they belong to.
- Take strict action against any acts of discrimination, including any complicit, covert or implied behaviour.
- Adhere to the policy on equal employment opportunity.
- Provide a working environment that is safe and does not entail any danger to life of any individual.
- Provide a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal/ external threats.
- Prevent gender harassment and provide a safe, secure and congenial work environment to all individuals, irrespective of their sexual orientation.
- Not exhibit or support any behaviour/ action, which may be construed as restricting the liberty of its people.
- Promote and support a work-life balance for all its people.
- Prohibit the use of all forms of forced employment, including the signing of bonds, or use
 of any coercive/ pressure tactics to retain people who wish to no longer continue in
 employment.
- Provide a clause in contracts of employment for termination by either party voluntarily by giving pre-defined notice.
- Not subject anyone to any act by which severe pain or suffering (physical or mental) is inflicted on the person for any purpose, including obtaining any information or as punishment for an act he has committed or suspected of having committed.

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- Ensure that no one is subjected to any instigation with the consent of any person acting in official capacity.
- Prohibit any act that causes or may cause mental suffering, including threats to family/ loved ones.
- Promote protection of human rights by the laws written and passed in the respective country.
- Deal severely with any instance(s) of policy violation within the organization
- Prohibit the discrimination of any person in relation to each other and before the law.
- Not initiate or support any action (explicitly or otherwise) that may be seen as interference with law of the land.
- Not, in any way undertake any action that will place another individual favourably/ unfavourably before law of the land.
- Have a grievance redressal mechanism to help employees voice their concerns and grievances.
- Have an escalation process to ensure speedy resolution of employee concerns.
- Designate an Ethics Counselor to provide avenues to people to report any unethical practice by any individual or group.
- Proactively seek to redress grievance(s) through periodic skip level meetings and oneon-one sessions.
- Respect the law of the land, and will not interfere in the legal proceedings, which are believed to be just and fair.
- Have a defined disciplinary policy to deal with cases of misconduct.
- Respect the right of everyone to a fair hearing by an impartial tribunal. Not do anything that hampers any individual's right towards the same.
- Maintain that any employee charged with a criminal offence shall have the right to be presumed innocent until proved guilty according to law.
- Give the right to defend himself/ herself if an employee is accused of a crime & follow the principles of natural justice. In case of misconduct, different levels of punishment are prescribed, which are commensurate with the gravity of the offence.
- Respect the privacy of all employees and shall not interfere in anybody's personal life, family and/ or home.
- Respect the right of an employee in exercising discretion while sharing information and shall not force anybody to share such personal information, which is not in accordance with the law of the land.
- Ensure that employees have the right to change any aspect of personal information in the records of the organization, as long as it is not intended to mislead the organization and is supported with valid evidence.
- Not interfere with anyone's right to free movement encompassing the freedom to work, live and travel within national and international borders.
- Encourage employees to explore opportunities at other locations through its Internal Career Progression programs.
- Not prevent employees from exercising the right to seek and enjoy asylum from persecution in other countries.
- Promote the policy of equal employment opportunity.
- Not prohibit or dissuade a person from changing his/ her nationality. Black Box Limited will adhere and respect the fundamental rights of an individual.
- Respect the right of an individual to the ownership and enjoyment of property, individually
 or in association with others.



- Respect the right of every employee to his freedom of thought, conscience and religion.
 This right is subject only to limitations provided by law which are necessary to protect public safety, order, health or morals or the fundamental rights and freedoms of others.
- Proactively encourage all employees to share ideas and opinions through various forums.
- Encourage open communications between its employees and the leaders. The Company will establish forums to ensure candid communication.
- Maintain an open door policy for employees at all levels.
- Not prevent anybody from joining or from being a part of any peaceful assembly or association.
- Not coerce anyone to become part of an association/ assembly.
- Acknowledge and endorse the fundamental principles relating to participation in the government or the country directly or through freely chosen representatives. Not prevent anyone from exercising this right.
- Encourage people to pursue learning opportunities, both within and outside the organization.
- Adhere to the social security schemes as specified by laws of the land, in letter and spirit.
- Provide a hygienic workplace, including clean facilities for wash rooms, drinking water and eating.
- Pay remuneration to every individual employed with the organization, the details of which are mentioned in his offer/ appointment letter.
- Practice the 'pay for the position' principle. The salary is paid on or before the dates specified under the respective country laws.
- Ensure recruitment process is designed to allow a fair and unbiased assessment of the candidates.
- Ensure in the event of separation, Black Box Limited clears all the dues within the stipulated timelines.
- Design a policy for working hours/ days and leaves, according to the applicable laws in respective countries.
- Adhere to the laws relating to defining of minimum wages in each country.
- Undertake market compensation benchmarking and believe in 'pay for the position' principle.
- Provide all statutory benefits as per law of land.
- Not do anything that will prevent any employee from exercising the right to education and in any way prevent any employee from participating/ enjoying this right.
- Not initiate or support any action aimed at destruction, violation or preventing exercise of any and all of the Human Rights, as mentioned under the UN Declaration.
- **5.** Any violation of this policy or its clauses shall be reported to the CPO by HR Lead.