

# Human Rights Policy

## Objective

To recognize, respect and promote human rights by treating everyone with fairness and dignity. The Company strives to create a work environment that is conducive to safeguarding human rights where all employees can express themselves freely. All our activities, decisions, and policies respect and support the dignity and rights of all individuals.

### Context:

Aragen Life Sciences Limited (the "Company" or "We" as per the required context) is committed to respecting the human rights of its employees, communities and those affected by its operations, wherever it does its business, including our employees, contractors, business partners and suppliers. Therefore, in the management of its businesses and operations, the Company strives to uphold the spirit of human rights, as enshrined in the Constitution of India, existing international standards, and the applicable laws of the country of operations. We are committed to upholding human rights across the value chain and are guided by the Universal Declaration of Human Rights, International Labour Organization conventions, and the UN Guiding Principles on Business and Human Rights. We continuously explore opportunities to identify and mitigate any human rights risks for our employees, children, migrant workers, third-party contract labour, etc.

## Scope

This policy applies to all the employees, contract workers of the Company. The Company expects its suppliers and contractors to treat their employees, and to interact with communities in ways that respect human rights and adheres to the spirit and intent of our Human Rights Policy.

## Principles

The Company is committed to conducting business in an ethical and responsible manner. This includes respecting internationally recognized human rights throughout our operations. Human rights are fundamental rights and freedom that all people are entitled to, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. We are committed to dealing with every person in an equal and inclusive way. These principles require all employees around the world to act with fair and lawful conduct toward other employees, colleagues, business partners and local communities. The important principles of the Company's policy on Human Rights are mentioned below:

### 1. PROHIBITION OF CHILD LABOUR, FORCED LABOUR, AND SLAVERY:

- The Company has zero tolerance towards and prohibits engagement of child labour, forced labour, slavery, and any form of human trafficking. The Company is committed to ensuring that no instance of child labour, forced labour, slavery or human trafficking occurs in any of its operations and establishments, and supply chain. The Company does not engage any individual for work who is less than 18 years of age.

- The Company has established robust process to monitor and ensure non-engagement of an individual below 18 years for work. The Company will not make use of slave, forced or compulsory labour in any form. The employees are made fully aware of the terms and conditions relating to employment prior to recruitment/ at the time of interview. The Company does not seek and retain identity documents nor any monetary or non-monetary deposits for their employment. The Company does not withhold any part of any employee's wages, benefits, property, to force such employee to continue working for the Company.
- The Company prohibits associated contractors, and suppliers from engaging child and/or forced labour, slavery, or any form of human trafficking. The Company also expects them to have and uphold similar standards and abide by the domestic laws in the countries wherein they operate. Any violation of these principle by them shall result in discontinuation of business association with the Company.

## **2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING:**

- The Company recognizes and respects the right of its employees to exercise freedom of association in matters related to their employment, as per the policies and procedures of the Company, without them having any apprehension.
- The Company observes laws and regulations around the world relating to freedom of association and is committed to and respects the right of collective bargaining of its employees, as per applicable laws/guidelines/regulations.

## **3. EQUAL OPPORTUNITY, NON – DISCRIMINATION, DIVERSITY AND INCLUSION:**

- The Company encourages an inclusive work environment, wherein diversity is valued, and equal opportunities are available to all the employees and stakeholders. The Company follows applicable laws and regulations in the matter of deciding wages, hours of work and welfare measures and its Code of Business Conduct and Ethics.
- The Company endeavors that the work environment across its operations remain free from discrimination in any form. The Company prohibits discrimination in the matter of compensation, training, opportunities, and employee benefits based on caste, creed, religion, language, ethnicity, disability, age, gender, sexual orientation, race, colour, marital status or any other status protected by appropriate laws.
- The Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. We also ensure that equal remuneration is paid to all our employees for work of equal value. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills and experience.
- The Company encourages all employees and individuals who provide services in our workplace to report instances of discrimination, whether personally experienced or observed in the workplace, at any level. Individuals should promptly report violations. Any allegations made in these matters are handled critically and confidentially. Violation of these cardinal principles may result in disciplinary actions which include termination, loss of pay, as well as other legal proceedings.

## **4. WORKING CONDITIONS:**

- The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions for all employees, contractors, and stakeholders. The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements.
- The Company works to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury, and health

impacts. We encourage them to report any unsafe or hazardous conditions noticed in the workplace to the management.

- The Company provides a safe and hygienic working environment, bearing in mind the prevailing norms of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- The Company assigns responsibility for health and safety to a senior management representative.

#### **5. WAGES, WORKING HOURS AND BENEFITS:**

- The Company compensate employees and workers in compliance with all applicable laws pertaining to wages, working hours, overtime and other benefits. They receive equal and fair remuneration based on merit, experience and qualifications, without any discrimination.

#### **6. PREVENTION OF SEXUAL HARASSMENT:**

- The Company is committed to protect the employees from sexual harassment and ensures the compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Company recognizes that protection of employees against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions. The Company shall deal expeditiously and fairly as per its policy for prevention of Sexual Harassment.

#### **7. CAREER MANAGEMENT AND TRAINING:**

- Aragen conducts trainings to strengthen in-house talent both on Technical and Behavioral skills. The company ensures that employees have right to pursue any career growth opportunity.

#### **8. GRIEVANCE AND REMEDY PROCESS:**

- We established mechanisms for reporting and addressing grievances and provide effective remedies for any violations of human rights. We will promptly investigate allegations and ensure timely and effective resolution of complaints. Aragen does not tolerate retaliation against anyone who in good faith reports possible violations of laws, the Code of Conduct, or other company policies or procedures.  
Supporting Policies: Grievance policy

#### **9. CORPORATE SOCIAL RESPONSIBILITY:**

- The Company is committed to demonstrating good corporate citizenship, by not only complying with all relevant laws and regulations, but also actively contributing to the improvement of the quality of life of people in the communities in which it operates.

#### **10. TRANSPARENCY:**

- The Company strives to have a workplace in which open, transparent and honest communications are valued and respected. Communication and transparency are the only means by which the employees can exchange ideas, information, communication, etc. Therefore, the Company is committed to promoting transparency and communication within the organization.

**11. DATA PRIVACY:**

- The Company respects the privacy of all individuals and confidentiality of any personal data that the Company holds about them is protected according to legal requirements.

**12. FREEDOM OF EXPRESSION**

- The Company encourages individuals and all other stakeholders to speak up if they believe that the Company policies, or any laws are being breached, or an individual or group is acting in a manner that would adversely impact the reputation of the organisation and or its employees. For employees, the Whistleblower Policy lays out the mechanism for any individual to raise a concern about unethical/non-compliant activities.

**13. ANTI-BRIBERY, ANTI-CORRUPTION:**

- The Company commits to working against corruption in all its forms, including extortion and bribery and actively educates employees, workers and suppliers as part of enforcing the anti-bribery and anti-corruption clauses of the Code of Conduct.

**14. REPORTING CONCERNS:**

- The Company believes that employees should have the opportunity to raise and achieve resolution by following a fair and prompt grievance redressal process, without fear of retaliation. The Company provides a grievance mechanism for employees to raise occupational concerns. This mechanism is accessible, understandable, and transparent to employees. Issues raised are dealt promptly, without any reprisal. This mechanism also provides employees with the option of flagging concerns anonymously.
- Employees and Third Parties acting on behalf of Aragen Life Sciences Limited shall immediately report any noticed or suspected violations of this policy in good faith by writing to [whistleblower@aragen.com](mailto:whistleblower@aragen.com)

## Procedure for conducting human rights risk assessment

1. Human Resource department shall carry out risk assessment by gathering inputs from internal teams (legal, SCM, Corporate services, EHS&S) and external stakeholders (surrounding community groups, NGOs, visitors, customers, suppliers)
2. Various areas where human rights risks could arise, including labor rights, health and safety, privacy, and environmental impacts shall be analyzed.
3. Human rights aspects such as forced labor, child labor, discrimination, and employee safety shall be considered.
4. Potential impact and probability shall be assessed as mentioned in the risk matrix format.
5. Risks shall be ranked based on their probability and potential impact (e.g., high, moderate, low risk)
6. Adequate controls shall be recommended and implemented to address and mitigate the identified high and moderate risks. This could include policy changes, supplier audits through SCM dept, employee training, or community engagement through corporate services dept. The human rights risks shall be monitored on regular basis through audits and feedback from stakeholders.
7. The risk assessment shall be regularly reviewed and updated to address new risks or changes in the business environment.
8. Maintain open channels of communication with stakeholders to get feedback and ensure company stays responsive to emerging human rights issues.

9. Human rights risk assessment shall be carried out for every two years by using format mentioned in Annexure - A

## Policy Review

The policy is to be regularly updated by management and all the changes will be communicated to the relevant parties. Updated policy will be made available to all stakeholders after revision.

## Policy References

1. Code of Conduct
2. Business Partner/Supplier Code of Conduct
3. Whistle blower and integrity policy
4. Standing orders
5. Employment Policy

## Power to amend


The management may at its discretion amend or withdraw any or all of the above provisions of this policy at any time with/without notice. The utility and the interpretation of the policy will be at the sole discretion of the management.

## Policy Tracker

Original	1st Amendment	2nd Amendment	3rd Amendment
1 <sup>st</sup> March, 2024	23 <sup>rd</sup> July, 2024		

	Prepared By	Reviewed By	Approved By
Name	Shanthi KS	Dr. N. Padmapa	SURESH ANUGOLU
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Date	23-Jul-24	24-Jul-24	25-Jul-24

Annexure- A

ARAGEN LIFE SCIENCES LIMITED, HYDERABAD, INDIA								
Human Rights & Labour Risk Assessment								
Revision No: 00								
Date:								
S.No	Human Rights Aspects	Description of Risk	Impacts on Aragen Business	Inherent Risk rating			Risk Category	Recommended controls
				Probability	Potential	Risk score		
Prepared by					Approved by			



Risk Matrix (5x5)						
Impact (I)		Probability(P)				
		Rare	Unlikely	Occasional	Frequent	Certain
		1	2	3	4	5
Critical	5	5	10	15	20	25
Major	4	4	8	12	16	20
Moderate	3	3	6	9	12	15
Minor	2	2	4	6	8	10
Insignificant	1	1	2	3	4	5

Probability Description					
Risk (R) is a product of Impact (I) and Probability (P) $R = I \times P$	May occur but only in rare and exceptional circumstances	Unlikely to occur but could happen	Possible and likely to occur at some time	Likely to occur frequently	Almost certain to occur in most circumstances

Risk Level	Risk Acceptability	Recommended Actions
1-10	Low Risk	A risk identified as acceptable & further reduction may not be necessary. However, if the risk can be resolved quickly & efficiently. Existing internal controls should be ensured all the time and recorded.
10-20	Moderate Risk	A moderate risk requires a planned approach to controlling the risk. Implemented recommended controls. Actions taken must be documented on the risk assessment form.
21-25	High Risk	A high risk requires immediate actions to mitigate the risk. Implemented recommended controls. Actions taken must be documented on the risk assessment form