

HUMAN RIGHTS POLICY

Version	Approval Date	Created By	Approving Authority
V1	09 th February 2023	Aftab Rahmathullah	Board of Directors - Approved at group level for both holding and subsidiary company
V2	05 th August 2023	Compliance	Board of Directors - Approved at group level for both holding and subsidiary company
V3	07 th February 2024	Sustainability & Impact Team	Board of Directors - Approved at group level for both holding and subsidiary company

Table of Contents

1. Objective	3
2. Scope.....	3
3. Commitment to respect human rights	3
4. Human Rights Issues Covered	3
4.1 Discrimination & harassment.....	3
4.2 Forced & bonded labour	3
4.3 Child labour	3
4.4 Human Trafficking.....	4
4.5 Diversity, Equity & Inclusion	4
4.6 Health, Safety and Security	4
4.7 Sustainability	4
4.8 Anti-Bribery and Anti-Corruption.....	4
4.9 Data Privacy	4
5 Employee Handbook.....	5
6 Value chain, business activities & new business relations.....	5
7 Due-diligence, Assessment, Mitigation & Remediation	5

1. Objective

Vivriti has built its strong and positive reputation over time on maintaining high standards of business conduct and ethics in dealing with our stakeholders. We strictly comply with principles and regulations related to protection of human rights and thoroughly ensure zero tolerance towards Human Rights violation cases in our own operations, value chain, business activities & new business relations.

2. Scope

This policy applies to the operations (employees, direct activities, products or services), and suppliers & partners of Vivriti Capital Limited and Vivriti Asset Management Private Limited.

3. Commitment to respect human rights

Vivriti is highly committed to respect human rights through compliance with nationally & internationally accepted standards. We protect the human rights of our employees, third-party employees, local communities, & vulnerable groups (including women, children, indigenous people, migrant workers, etc.).

4. Human Rights Issues Covered

4.1 Discrimination & harassment

A key tenet of the Vivriti way of working is creating respect for all individuals by way of providing a workplace that is free from discrimination and harassment. Vivriti believes to build, grow and sustain a diverse talent pool from all strata of the society and has zero tolerance towards discrimination or harassment based on race, colour, religion, disability, gender, age, sexual orientation or any other identified status.

4.2 Forced & bonded labour

Vivriti is committed to ensuring that all members of its team are recruited in an ethical manner that does breach the requirements of employment at will.

1. No team members are required to work at Vivriti by way of forced or bonded labour.
2. Vivriti will not require team members to leave their official identity papers, including passports, driving licenses or any other form of Government issued IDs without their voluntary and explicit consent, or as required by the law.
3. Vivriti will not work with any agency or recruiting company which requires prospective team members to pay a fee to gain entry into Vivriti.
4. Vivriti is against any form of coerced or prison labor, use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.

4.3 Child labour

Vivriti is committed to the adherence of the minimum age provisions in applicable laws and regulations where we conduct business & is against the exploitation of children. Vivriti prohibits the employment of any person under the age of 18. Furthermore, Vivriti operates in full compliance with applicable wage and benefit laws of the jurisdiction in which we operate.

4.4 Human Trafficking

Vivriti strongly prohibits and is against all forms of human trafficking.

4.5 Diversity, Equity & Inclusion

Vivriti recognizes and celebrates the value and contribution everyone brings to our workplace and appreciates the value of attracting and retaining employees from different backgrounds. Vivriti is committed to creating an environment that is fair and flexible in promoting personal and professional growth of its diverse workforce (including fair remuneration & equal opportunity practices). This commitment matched with a drive to open doors to talent from all corners is the underlying key to our success and thus extremely crucial to the way we think and operate. Our aim is to ensure that our business policies, procedures, and behaviors promote diversity, equity and inclusion and create an environment where individual differences are valued. Details on our strategy have been summarized in the Diversity, Equity & Inclusion Policy.

4.6 Health, Safety and Security

Vivriti is committed to operate in an environment that minimizes the risk of preventable accidents, injury and exposure to health risks. Weapons of any sort are not allowed inside the premises. Threats (whether implicit or explicit), intimidation and violence have no place at Vivriti and will not be tolerated. Vivriti also has the **Health, Safety and Environment (HSE)** policy that commits to safeguarding the health and safety of people, property and the environment.

4.7 Sustainability

Vivriti is committed to following sustainable practices in all its endeavours and has a committed team for the governance of these practices. As a responsible corporate citizen, Vivriti is committed to delivering value to all its stakeholders as well as the larger community. Our ESG policy establishes our roles & responsibilities towards environment, social, labour & working conditions & governance. It advocates our ESG framework & identifies opportunities to promote environmental sustainability & equitable growth through our products.

4.8 Anti-Bribery and Anti-Corruption

Vivriti's **Anti-Bribery & Anti-Corruption** policy establishes its position on bribery and corruption in detail. The policy and processes are reviewed by the Board and other audit committees at regular intervals. The company has also adopted a Whistle-blower mechanism for reporting issues/concerns on unethical behaviour, actual or suspected fraud, or violation of the Company's code of conduct.

4.9 Data Privacy

Vivriti's Data Privacy Policy ensures that the privacy & protection of the personal information of its employees, candidates, visitors, customers & other stakeholders are in compliance with laws and regulations.

5 Employee Handbook

We are committed to ensure compliance to all our obligations and in doing so, believe it is important to educate employees on their rights and responsibilities. We have created reference documents in the form of employee handbooks and policy portals, that serve as a guide to employees on their benefit entitlements. These documents are reviewed regularly to ensure they are always updated.

6 Value chain, business activities & new business relations

The application of this Policy across our value chain (our business activities & business relations – suppliers, partners, etc.) is further aided by the human rights' requirements covered in our other two policies - Vendor Code of Conduct & Vendor Management.

7 Due-diligence, Assessment, Mitigation & Remediation

7.1.1 Human rights' risk identification through due-diligence

The Human Rights Policy, Vendor Code of Conduct & Vendor Management Policy applies to all our operations, business activities & business relations.

- i. Risk identification in our own operations:
 - We conduct ESG risk assessment of our own operations annually. Based on our yearly performance on E, S (including human rights) & G criteria which we measure and report on our yearly sustainability reports, we model similar parameters in the VSAM. This exercise helps us assess and score our own sustainability performance, thereby helping us identify risks and opportunities (including risks related to human rights) and detect gaps with areas for improvement.
- ii. Risk identification in our value chain (clients, suppliers, partners, etc)
 - a. Client due-diligence:
 - We have a standardized in-house Sustainability Assessment Model called VSAM covering 37 sectors, the taxonomy of which is based on global and regional frameworks. The model assesses the ESG performance of our clients on environmental & social parameters (including human rights). The VSAM is a part of our client ESG due-diligence process that helps us evaluate the level of ESG performance (risks & opportunities) of our clients and apply applicable designed stewardship and engagement interventions aimed at improving their performance.
 - The S & I Team, working with the Credit Teams, shall also conduct a periodic ESG risk assessment on the enterprise borrower (in which Vivriti has lent money or has on balance sheet financing) on a yearly basis on the exclusion/prohibition list that prohibits (outlined in our ESG Policy):

- Engagement in any activities related to human trafficking, child labour or forced labour (outlined in our ESG Policy)
- Projects or companies identified by the Government to be in violation of local applicable law related to environment, health, safety, labor (including human rights), and public disclosure
- For enterprise borrower in which Vivriti has on-balancing exposure, the S & I Team working with the Credit Teams, will also conduct site visits on the occurrence of any trigger events (events of controversial nature including violation of labour laws & human rights) as outlined in our ESG Policy:
 - For any notice issued by regulatory authority to any client for non-compliance of provisions of applicable environment and labour laws (including human rights)
 - On levy of significant fines or penalties or any other liabilities under any applicable labour (including human rights) and environmental laws by any regulatory authority
 - Whether any notice issued or proceedings initiated against the company for any violation or non-compliance of any environment and labour laws (including human rights)
- Any non-compliance identified during the periodic assessment/diligence will be reported to the ESG Risk Assessment Committee, who will decide on any further action to be taken

b. Vendor due-diligence:

Due-diligence of our vendors conducted as stipulated in the Vendor Code of Conduct & Vendor Management Policy.

7.1.2 Mitigation & Remediation of human rights' issues

- The risk identification measures stipulated above, help us identify risks and opportunities (including risks related to human rights) and detect gaps with areas for improvement
- For our own operations, S & I Team works with other teams to fill in the gaps
- S & I Team Credit Teams work on mitigating & remediating the identified risks through a client stewardship & engagement plan (outlined in our ESG Policy)
- The Vendor Code of Conduct & Vendor Management Policy covers the risk assessment & monitoring processes followed for mitigating & remediating issues of human rights related to our vendors, partners, etc.