

HR-HUMAN RIGHTS-POL

Human Rights

Version No. 1.0

Eff. Date: 21 April 2022

Cyient's Human Rights Policy Statement

Cyient has a business imperative to be a responsible, accountable, and equitable company. The foundation of which is our values of Fairness, Integrity, Respect, Sincerity, and Transparency (FIRST). We believe it is our responsibility to respect and protect human rights and to contribute to positive human rights impacts.

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. Our Human Rights Policy is a cornerstone in these endeavors. All Cyient associates follow our Code of Conduct. (link to Cyient code of conduct)

Our Human Rights policy applies to all Cyient Ltd. and all its subsidiaries. Our Human Rights policy is based on the following 10 principles:

- Respect for Human Rights
- Community and Stakeholder Engagement
- Inclusion and Diversity
- Anti-harassment and nondiscrimination
- Freedom of Association and Collective Bargaining
- Safe and Healthy Workplace
- Workplace Security
- Modern slavery and Human Trafficking
- Child Labor
- Work Hours, Wages and Benefits

At Cyient it is every associate's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment, aligned with our Human Rights Policy. If any associate believes that someone is violating the Human Rights Policy and/or the law, they are asked to report it immediately to their manager, Human Resources, Company legal counsel or our third-party ethics line.

<https://www.lighthouse-services.com/cyient>

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A: Respect for Human Rights

Cyient respects and values the rights of our associates and strives to provide them with a safe and inclusive environment in which they can excel. We treat our associates with respect and dignity, actively protecting and progressing their human rights. We recognize that we operate in a diverse world with many different social cultures, traditions, and customs, and we encourage our associates to embrace, celebrate and honor them. We believe the diverse viewpoints and ideas that everyone brings to the workplace creates an opportunity for innovation.

B: Inclusion and Diversity

Cyient's vision for inclusion and diversity is to create a collaborative workplace that supports diverse thinking and inspires talented people to reach their potential. Cyient believes that valuing diversity and inclusiveness is a competitive differentiator enabling us to achieve our vision to create unmatched value for our customers, colleagues, business partners, shareholders, and society. We embrace and encourage our associates' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our associates unique. Cyient has a unique approach with a Board-level subcommittee overseeing and suggesting measures to a team that is tasked with working on initiatives.

C: Anti-harassment and Nondiscrimination

Cyient has a zero-tolerance approach to harassment or discrimination of any kind. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Cyient also prohibits sexual harassment of any kind. Therefore, Cyient expects that all relationships among persons in the workplace will be business-like and free of explicit bias, prejudice and harassment. Cyient wants to ensure that all its associates can work in an environment free from unlawful harassment, discrimination, and retaliation. Cyient will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Reference: Prevention of Sexual Harassment Policy

[HR-IN-G-POSH-C5-POL V 1.1.pdf \(cyient.com\)](#)

D: Freedom of Association and Collective Bargaining

We respect our associates' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where associates are represented by a legally recognized union or a works council; we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

E: Safe and Healthy Workplace

The health and safety of our associates is paramount to Cyient. We strive to provide a safe and healthy environment for all associates by implementing appropriate management controls to comply with applicable health and safety guidelines and regulations. We have developed a specific program called "Safety at Cyient" which encourages all associates to be actively involved in making the work environment safe and healthy. We also ensure that we consider the overall wellness of our associates: physical, mental, and spiritual. We have programs to address each area and as the business environment evolves, we will continue to invest in new ways to with their overall wellness.

Reference: EOHS Policy

[EOHS Policy 2015.pdf \(hubspot.net\)](#)

F: Anti-bribery and Anti-corruption

Cyient has a zero-tolerance policy on anti-bribery and anti-corruption. Our Anticorruption Policy has been designed to prevent violations of the FCPA, UK Act, and other anticorruption laws or appearance of impropriety or corruption, and to satisfy the Company's obligation to have adequate procedures for monitoring, detecting, preventing and punishing any violations of the Anti-Bribery Laws and other anticorruption laws, in place.

Reference: Anti-corruption policy

[Anti Corruption Policy - Version 2 0 0704161.pdf \(hubspot.net\)](#)

G: Modern Slavery and Human Trafficking

Cyient prohibits all forms of modern slavery including all acts of human trafficking, forced or compulsory labor, slavery, forced marriage, servitude, debt bondage, deceptive recruiting for labor or services and the worst forms of child labor, including situations where children are subjected to slavery or similar practices, or engaged in hazardous work, in its organization, business operations, and supply chain.

Cyient is committed to ensuring that slavery and human trafficking do not exist in any part of its business operations or supply chain. Cyient's internal processes and policies such as Corporate Social Responsibility Policy, Business Code of Conduct, Whistleblower Policy, and practices emphasizing antislavery and human trafficking are a more significant part of the effort to ensure transparency, accountability, and protection of Human Rights are extended throughout its business operation and supply chain.

The policies mentioned above stipulate Cyient's ongoing commitment to protecting Human Rights, banning human trafficking, forced or compulsory labor, slavery, forced marriage, servitude, debt bondage, deceptive recruiting for labor or services, and the worst forms of child labor, including situations where children are subjected to slavery or similar practices, or engaged in hazardous work, and also available on Cyient's business website (<https://www.cyient.com/>).

In addition, Cyient attempts to work with the suppliers who agree to adopt the same high standards and have introduced to a new Cyient Vendor Code of Business Conduct that addresses labor practices and human rights explicitly, expressly requiring vendors to ensure that forced, bonded, or any other form of compulsory labor are prohibited within their supply chains. Furthermore, a signed declaration from them to this effect is procured prior to any formal engagement.

Cyient conducts regular site visits by management and undertakes annual opinion surveys with its associate community, which provides a mechanism for individual issues to be reported. Cyient also has an anonymous, confidential, external whistleblowing hotline through which specific concerns can be raised. Cyient plans to make its associate aware of red flags, which could signal issues relating to modern slavery and human trafficking and provide them with guidance on how they should respond if they identify any suspicious activity. Cyient considers these steps an appropriate response to the risks that it faces in relation to modern slavery and human trafficking. However, Cyient will continue to monitor this area with due vigilance and respond accordingly to any change in the level or nature of risks.

Reference: Modern Slavery Policies

[Modern Slavery and Human Trafficking Statement \(cyient.com\)](#)

[Modern Slavery Policy Statement CAPL.pdf \(cyient.com\)](#)

H: Child Labor

As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in children's exploitation and helps end it to the best of our ability. We do not employ children and will not tolerate the exploitation of children in any form.

As an Organization, Cyient will not employ children that falls into the definition stipulated by ILO Convention. Cyient will comply with all other applicable child labor laws, including those related to wages, hours worked, overtime and working conditions region wise. Cyient is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant local government authorities the company is operating in.

We also ensure that these guidelines and expectations are understood and integral to our vendor agreements. In addition, Cyient attempts to work with the suppliers who agree to adopt the same high standards and have introduced to a new Cyient Vendor Code of Business Conduct that addresses labor practices and human rights explicitly, expressly requiring vendors to ensure that forced, bonded, or any other form of compulsory labor are prohibited within their supply chains. Furthermore, a signed declaration from them to this effect is procured prior to any formal engagement.

I: Work Hours, Wages and Benefits

We compensate associates competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws. Benefits are benchmarked to location/region/country for the job and employment categories that are relevant to our businesses.

Compliance is ensured by system alerts, periodic audits, and reporting reviews. Vendors for associate payroll, insurance, benefits providers, and consultants are made aware of Cyient requirements through vendor contracts, onboarding training and subject to audits as applicable. Where required, Cyient also commits to its customers, similar audit privileges, and has established a process of taking and implementing feedback and suggestions.

J: Grievance Mechanism

An efficient grievance redressal system has been set up at Cyient which ensures that human rights issues and compliance requirements are adhered to across the organization. It also has an efficient whistleblower mechanism that empowers associates of the company, including subsidiaries, to approach the Ombudsperson of the company and make protective disclosures about unethical behavior and actual or suspected fraud. Further, an Internal Complaints Committee is also present, as required by law.

Cyient conducts regular site visits by management and undertakes annual opinion surveys with its associate community, which provides a mechanism for individual issues to be reported. Cyient also has an anonymous, confidential, external whistleblowing hotline through which specific concerns can be raised. Cyient plans to make its associate aware of red flags, which could signal issues relating to modern slavery and human trafficking and provide them with guidance on how they should respond if they identify any suspicious activity. Cyient considers these steps an appropriate response to the risks that it faces in relation to modern slavery and human trafficking. However, Cyient will continue to monitor this area with due vigilance and respond accordingly to any change in the level or nature of risks.

Reference: Whistleblower policy
[Whistle-Blower-Policy-Procedure.pdf \(hubspot.net\)](#)

K: Sustainability

Cyient ensures that the Environmental, Social, and Governance (ESG) aspects are strengthened across the value chain with strong leadership commitment, collaborative

partnership, and an empowered ecosystem enabling long-term sustainable value generation.

L: Human Rights Education and Training

Cyient provides trainings for all employees on discrimination and harassment in the workplace.

M: Data Privacy

The protection of stakeholder's personal data is of utmost importance to Cyient, highest standards are adopted to ensure the protection of the right to data protection of our data subjects. We ensure that all persons/entities with whom the data is shared are compliant with the applicable data protection laws.

Reference: Data Privacy Policy

[Privacy Policy | Cyient](#)

N: Community and Stakeholder Engagement

Cyient believes in empowering societies where we work and exist with a mission to achieve long-term, holistic development of the community around us by supporting programs that bring a sustainable change through education, environment, and healthcare systems. We created the Cyient Foundation in 2002 which has conceptualized and enabled numerous social initiatives to facilitate access to quality education, skill development, and business-aligned social innovation, as well as invested significantly in environmental development projects. Cyient remains committed to delivering on our promise to shareholders, customers, associates, and society through our robust journey of growth. Cyient believes in giving back to society in direct proportion to its success in business.