

# HUMAN RIGHTS POLICY

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## **1. Purpose**

Bharti Real Estate Limited is committed to demonstrating global citizenship by respecting the basic rights of all stakeholders that it encounters through products, services, contracts, purchases, and other business operations. It respects the human rights of its customers, employees, suppliers, partner companies and the community, in accordance with the Indian Constitution and the applicable Indian Labor Laws. It is also guided by fundamental principles of human rights, such as those enumerated in the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This policy is intended to express Bharti Real Estate's commitment to do business with ethical values and embrace practices that support human rights, in every geography that we operate in. This Policy applies to our direct and indirect business operations including subsidiaries and suppliers, who shall be committed to uphold the integrity of this policy, in every geography that we operate in.

## **2. Principles of the Policy**

### **2.1 Equal opportunity and non-discrimination**

It is Bharti Real Estate's constant endeavor to ensure there is no discrimination by gender, ethnicity, religion, disability, and race, with respect to employment and occupation. Bharti Real Estate is committed to building a culture based on diversity and inclusion, wherein all employees, including potential candidates can compete in a fair, open and transparent environment. Merit in qualification, performance and capability form the sole criteria for selection. Wages, hours of work and social benefits, are based on applicable local laws and regulations as well as prevailing market standards and practices. However, Bharti Real Estate strives to ensure that employees receive equal pay for equal work, irrespective of their gender, and remediate if inequalities are found.

### **2.2 Harassment-free workplace**

Bharti Real Estate is committed to providing a work environment free from all forms of harassment, whether physical, verbal or psychological. Employees have the right to freedom of opinion and expression.

### **2.3 Freedom of association**

Bharti Real Estate respects the right of employees to exercise their lawful right of freedom of association.

## 2.4 Safe and healthy workplace

Bharti Real Estate strives to institutionalize health and safety processes, with special focus on aspects such as women's safety, assistance to persons with disability, emergency response and preventive health & safety measures.

## 2.5 Prohibition of child labor and forced labor

Bharti Real Estate is committed to prevent child labor and forced labor including bonded labor, slavery and human trafficking.

## 2.6 Data privacy

Bharti Real Estate is committed to protect the data privacy of its employees, customers and suppliers. We do not disclose information to third parties without explicit consent of our stakeholders, unless required by law to do so. We have an optimal security system for preventing leaks and our Ombuds process and security incident management process allows reporting of data breaches and policy violations.

## 2.7 Prevention of Misuse of Technologies, Services, and Data

Bharti Real Estate strives to ensure that our technologies, electronic devices and data are not put to any misuse such as wiretapping, signal interference or hacking.

# 3. Grievance Mechanism

Bharti Real Estate is committed to prevent any human rights violation and provides all its employees, vendors and suppliers access to raise grievances and to report confidentially and anonymously any breach in the Human Rights Policy through the Ombuds process.

# 4. Human Rights Due Diligence and Risk Management:

## 4.1 Human Rights Management

At Bharti Real Estate, we believe that economic value cannot be sustained unless it is created on a foundation of ethics and responsibility. Respecting the human rights of stakeholders across our value chain is one of our core priorities, which begins through responsible action at our own operations. Creating a safe and empowered workplace with a culture that drives equal opportunity, non-discrimination, meritocracy and freedom of expression is paramount to us. Similarly,

we ensure that our business activities do not adversely impact any of our external stakeholders such as our suppliers, partners, customers and the wider community.

Our commitment to human rights is reinforced through our Code of Business Conduct (COBC), as well as guided by U.N. Universal Declaration of Human Rights and International Labor Organization's declaration on Fundamental Principles & Rights at Work. While these provide the guidelines for responsible business conduct at a global level, our policies are shaped and customized by local regulations. Our Human Rights policy is applicable to all employees across the organization, while the code of conduct for business associates and vendors details the requirements for partners and suppliers to uphold and respect human rights.

## 4.2 Human Rights Risk Management

### ○ Risk Identification in Own Operations

**Training:** All employees undergo a training on the COC and other Bharti Real Estate policies at the time of induction as well as an annual refresher training, to ensure that employee behavior is in line with the principles upheld by the company. This serves as the first step towards our commitment to prevent risks related to human rights.

**Due Diligence:** In order to identify potential risks, we have a human rights due diligence process which is conducted annually through Bharti's group wide compliance monitoring. This entails undertaking a detailed monitoring at 100% of our sites including all business functions, to track performance on various human rights related subjects such as working conditions, minimum compensation, equal opportunity, privacy and information security, freedom of association etc. including labour laws of the country.

Bharti Real Estate also regularly tracks human rights issues prevalent across the business sector to update the potential risks which are monitored internally. In addition to this an independent audit is conducted periodically to assess the statutory risks pertaining to human rights and any observations are promptly reported and remediated.

These assessments also enable us to identify 'risk hot spots' or areas where potential human rights issues can occur in our operations, as well as target group of stakeholders i.e. groups most vulnerable to the identified risks.

**Ombuds process:** We have a robust ombuds process which allows employee, contractors and vendors, to raise a grievance or complaint without any fear of reprisal. Every complaint is addressed through prompt action. Moreover, the ombuds team does a trend analysis basis the complaints received to identify the root causes and accordingly highlight any existing risks of human rights violations to the management.

**Sexual Harassment:** In order to prevent sexual harassment in workplace, the company has set up an Internal Complaints Committee comprising of a Presiding officer who is a senior level woman employee. The Company has also appointed

one member from the Ombuds office and one independent member from outside the organization with expertise and experience in dealing with such cases. The committee constitution is communicated to all employees and is also prominently displayed in the public areas of all offices.

- **Risk Identification in Value Chain**

It is our endeavor to not only prohibit undesirable practices but to not associate with any partner who is in dissonance with our principles of ethical practices. Every vendor/supplier before on-boarding, undergoes a comprehensive screening where compliance to labour laws and human rights such as child labour, working conditions, remuneration, freedom of association, health and safety practices etc. is assessed. The suppliers post on-boarding are assessed at regular intervals to ensure timely identification of any existing risks and they are free to raise any concerns/issues through our Ombuds process.

Since stakeholder engagement is decentralized at Bharti Real Estate, employees are accountable for managing relationships, meeting expectations and thus upholding the human rights of all stakeholders within their areas of responsibility. There are a number of opportunities that allow stakeholders to report grievances /issues which are appropriately addressed. These complaints are also assessed to identify any prevalent risks related to human rights in our value chain or occurring due to our operations, products and services.

- **Risk Addressal**

The risks identified in own operations or in the value chain are addressed through implementation of appropriate corrective actions which can range from risk prevention through awareness sessions and precautionary measures, risk reduction through building capacity and safeguards or risk elimination through modifications in the business process or termination of contract.

Cases of human rights violations are dealt as per our consequence management policy and can include warnings, counselling, penalties and even termination of employment depending upon the severity of violation.

## **5. Deviations/Exceptions**

There will be no deviations from this policy.