

COMPREHENSIVE HUMAN RESOURCES, SOCIAL & LABOR RIGHTS POLICY

Fair Treatment • Human Rights • Responsible Employment • Worker Welfare

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Review	Periodic and upon material change
Approval	Managing Director
Status	Controlled Management-System Document

1. Purpose

This Policy establishes Ziran India's overarching commitments for responsible employment, human rights, fair treatment, worker welfare and social performance. It consolidates and strengthens the existing HR and human-rights policy framework into one controlled policy while retaining the detailed procedures and records used for implementation.

The policy is intended to provide a clear policy-level framework; implementation is demonstrated through HR procedures, employment records, payroll and attendance records, training and competency records, employee feedback, grievance records, health and safety records, audits, corrective actions and management review.

2. Scope

This Policy applies across Ziran India operations and to employment practices under the organization's control. Relevant human-rights, labour, safety and ethical expectations shall also be communicated to applicable contractors, labour suppliers and service providers through the established supplier/contractor controls.

3. Policy Commitments

Commitment	Policy requirement
Respect for human dignity	Ziran India is committed to respectful, fair and dignified treatment of employees and workers.
Child labour prevention	Child labour is prohibited. Age shall be verified during recruitment and appropriate employee records maintained. The established child-labour remedial procedure shall apply where a concern is identified, including controls relevant to temporary/contract labour.
Freedom from forced labour	Forced, bonded, involuntary and prison labour are prohibited. Employment shall be freely chosen; identity documents shall not be improperly retained and recruitment fees shall not be imposed on workers.
Freedom of association	Ziran India respects applicable freedom of association and the right to collective bargaining, subject to applicable law.
Fair wages and benefits	Ziran India shall identify applicable wage requirements and verify payroll against applicable rates, benefits and statutory requirements. Eligible statutory benefits shall be assessed and maintained through HR/payroll controls.
Working hours, overtime and rest	Working hours, shifts, overtime, weekly rest and leave shall be controlled through attendance, roster, leave, overtime and payroll records. Overtime shall remain within applicable requirements and shall receive applicable compensation.
Equal opportunity and non-discrimination	Employment decisions shall be based on relevant job and organizational requirements. Discrimination and harassment are prohibited, consistent with Ziran's established non-discrimination/non-harassment policy.
Human rights and responsible conduct	Human-rights risks shall be identified, addressed through controls and escalated where significant. Retaliation against persons raising good-faith concerns is prohibited.
Grievance and worker voice	Employees shall have accessible channels to raise concerns. Grievances shall be handled confidentially where appropriate, investigated, resolved where appropriate, recorded and protected against retaliation.
Health, safety and wellbeing	Ziran India shall maintain controls covering occupational health and safety, incident reporting, emergency preparedness, fire, first aid, chemical safety, PPE, medical/occupational-health requirements and workplace conditions.
Leave, welfare and workplace conditions	Applicable leave, welfare facilities, hygiene, drinking water, washrooms, canteen, medical support and suitable workplace conditions shall be maintained and monitored through established records and inspections.
Privacy and confidentiality	Employee personal information shall be handled through applicable data-protection, confidentiality and information-use controls.
Training and development	Employees shall receive relevant training and awareness, with competency evaluated where required. Training and competency records shall be maintained.

4. Responsible Employment Controls

Control Area	Minimum implementation requirement	Primary evidence
Recruitment & employment	Verify age; document employment terms, status, wages, working hours and applicable requirements.	Employee records; appointment letters/contracts; recruitment records
Wages & benefits	Review applicable wage rates, payroll, deductions and eligible statutory benefits.	Payroll; wage register; statutory-benefit records; compliance review
Attendance & working time	Review attendance, shifts, overtime and weekly-rest requirements.	Attendance; shift rosters; overtime records
Leave	Maintain applicable leave entitlement and records.	Leave cards/register; monthly leave status; payroll/attendance
Grievances	Receive, investigate, resolve where appropriate and protect against retaliation.	Grievance; whistleblower; misconduct records
Employee welfare	Inspect welfare facilities and workplace conditions and address deficiencies.	Hygiene/welfare inspections; medical records; corrective actions
Training & competency	Plan, conduct and evaluate relevant training; retain evidence.	Training attendance/evaluation; competency records
Contractors / labour suppliers	Apply relevant human-rights, labour, safety and ethical requirements.	Supplier/contractor assessments; applicable codes and due diligence

5. Roles and Responsibilities

Role	Key responsibility
Managing Director / Management	Provide direction and resources; approve the policy; review significant labour, human-rights and welfare issues.
HR	Maintain employment, age, attendance, leave, wage/benefit, training, employee-feedback and grievance-related controls; coordinate corrective actions.
Department Heads / Supervisors	Maintain suitable working conditions, monitor working time and escalate deficiencies or concerns.
EHS / Safety	Manage workplace safety, PPE, first aid, emergency preparedness, health and safety findings and related records.
QA / IMS / Quality	Support system verification through audits, CAPA and management-system review.
Employees	Follow workplace requirements, use facilities responsibly, participate in required training and raise concerns through available channels.

6. Human-Rights Due Diligence and Corrective Action

- Human-rights and labour compliance shall be included in applicable internal-audit planning using defined checklists.
- Findings shall be recorded and managed through the established nonconformity/CAPA process.
- Significant findings, overdue actions and recurring issues shall be escalated to management review.
- Effectiveness shall be evaluated using evidence rather than relying solely on zero-incident or zero-complaint statements.
- Relevant contractor and labour-supplier risks shall be addressed through supplier/contractor assessment and applicable sustainability requirements.

7. Current 2026 Corrective-Action Priorities

Ziran's June 2026 Eurofins PSCI pre-assessment identified sampled-record gaps relating to overtime compensation, weekly rest, minimum wages, HRA, PF, ESI and leave with wages. These findings are treated as corrective-action priorities and are not presented as evidence of completed implementation.

Priority	Required control / closure evidence
Overtime compensation	Align payment with applicable statutory requirement; verify through revised payroll, attendance/overtime records and compliance review.
Weekly rest	Implement and evidence required weekly rest through shift/attendance records and HR review.
Minimum wages	Review employee categories and applicable minimum wages; retain wage comparison and corrective-payment evidence where required.
HRA / PF / ESI	Determine applicability and implement required benefits; retain payroll/statutory evidence.
Leave with wages	Implement applicable entitlement and retain leave, payroll and attendance evidence.

8. Workforce KPI Linkage

The controlled KPI Measurement Record for the current internal reporting period defines workforce indicators including LTI frequency rate, average training hours per employee, women employees as a percentage of direct workforce, and minority/vulnerable workers as a percentage of direct workforce. These indicators are monitored by the responsible functions and reviewed through the management-system process.

KPI	Current controlled target / control
K01 LTI Frequency Rate	0
K02 Average Training Hours per Employee	≥ 1.5 hours/employee
K03 Women Employees	≥ 20% of direct workforce
K04 Minority/Vulnerable Workers	≥ 15% of direct workforce

9. Records and Evidence

- Employee records and employment documentation.
- Age verification and recruitment records, including remedial records where applicable.
- Attendance, overtime, wage, leave and statutory-benefit records.
- Training attendance, evaluation and competency records.
- Medical and occupational-health records.
- Employee feedback, grievance, whistleblower and employee-misconduct records.
- Hygiene, welfare, PPE, workplace-condition and safety inspection records.
- Internal audit, nonconformity, CAPA and management-review records.
- Supplier/contractor assessments and applicable human-rights evidence.

10. Communication and Awareness

This Policy shall be communicated to relevant employees and integrated with applicable HR training, induction, workplace-rights awareness and management-system activities. Supporting procedures and records shall provide the operational evidence for implementation.

11. Controlled References

- ZIR/POL/HR/004-00 – Forced/involuntary/bonded/prison labour – 01.04.2021.
- ZIR/POL/HR/005-00 – Freedom of association & right to collective bargaining – 01.04.2021.
- ZIR/POL/HR/006-00 – Minimum wage policy – 01.04.2021.
- ZIR/POL/HR/007-00 – Non-discrimination/non-harassment policy – 01.04.2021.
- ZIR/POL/HR/008-00 – Overtime policy – 01.04.2021.
- ZIR/POL/HR/009-00 – Policy on no child labour – 01.04.2021.
- ZIR/POL/HR/010-00 – Whistle blower policy – 01.04.2021.
- ZIR/POL/HR/013-00 – Human right policy – 01.04.2021.
- ZIR/POL/HR/014-00 – Grievance redressal policy – 01.04.2021.
- ZIR/SOP/HR/009-00 – SOP for child labour remedial – 01.04.2021.
- ZIR/HR/SOP/012-00 – SOP for reporting employee misconduct – 01.04.2021.
- ZIR/SOP/HR/002-00 – SOP for leave card; ZIR/SOP/HR/003-00 – SOP for shift change; ZIR/SOP/HR/005-00 – SOP for training.
- Labour & Human Rights Compliance Action Plan – effective 01.04.2026.
- Employee Welfare & Workplace Conditions Action Plan – effective 01.04.2026.
- Ziran KPI Measurement Record – current controlled internal reporting record.

12. Approval

Prepared By – HSE/Admin coordinator -	Approved By – MD
	