

# Human Rights Due-Diligence Framework

As an organization it is of utmost importance that we undertake our business with honesty and integrity and ensure a safe and conducive work environment for everyone, free of discrimination and harassment. We are committed to uphold and respect human rights. For the same, we will follow a due diligence framework which is aligned with the “OECD Due Diligence Guidance for Responsible Supply Chains”.

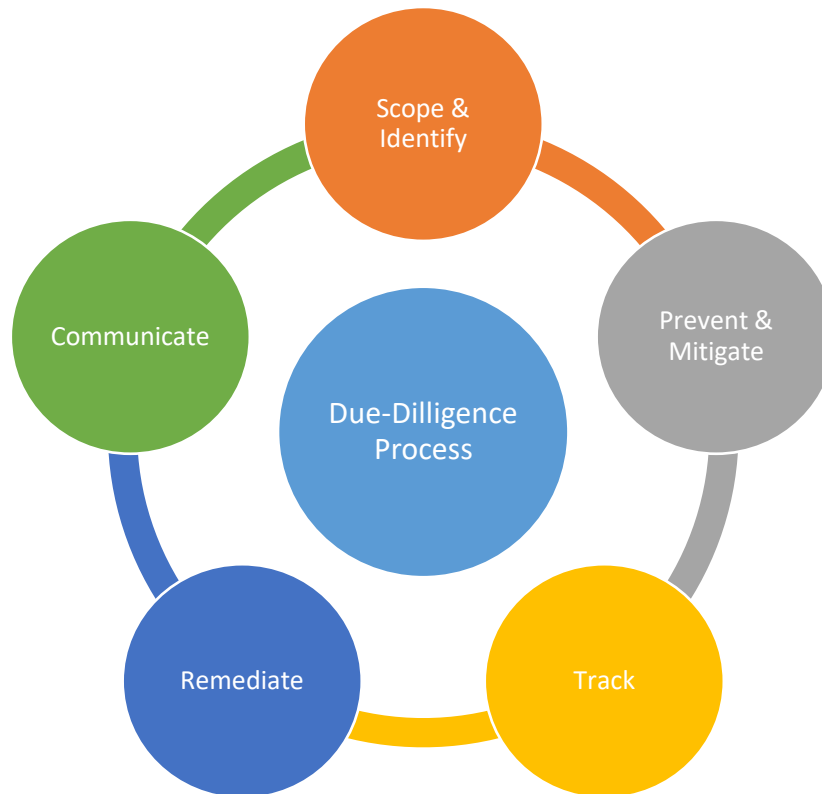


Figure 1: Due Diligence Framework

## Scope and Identify

This step focusses on identifying potential and actual issues in our own operations and its supply chain. It includes the following sub-steps:

1. Scoping the risks of harm in own operations and in its supply chain
2. Conducting a self-assessment of the own operations
3. Assessing suppliers associated with higher-risks
4. Assessing the organisation’s relationship to impacts

It is important that the coverage of this step includes proper representation of all the groups which are vulnerable to human rights issues irrespective of the nature of work and employment relationship. Some of the identified vulnerable groups are:

- Employees
- Workers (migrant / contracted / daily wage)
- Women
- Children
- Indigenous people
- Local Communities

Apart from this, it is essential to at least include the follow human rights risks:

- Forced labour
- Child labour

- Discrimination
- Health & safety
- Working condition
- Freedom of association
- Right to collective bargaining
- Equal remuneration

An important point to note is that, the above list is not exhaustive, depending on the nature of work, groups and human rights issues can be included or excluded from the above list with proper justification during the assessment process. A template due-diligence questionnaire (Annexure I) is also prepared to aid the assessment process. This questionnaire can also be modified based on the human rights issues, nature of works and vulnerable groups.

## Prevent and Mitigate

After the identification of vulnerable groups and human rights is completed, the next step is to understand the underlying causes of the identified risks. Some risks could be driven by direct employment relationships and working conditions or some due to indirect causes like discrimination or gender bias. Once the understanding is developed, existing policies, systems and procedures should be reviewed and a corrective action plan for providing appropriate safeguard to cease, prevent or mitigate the identified risks should be prepared. The newly established systems should complement & work in conjunction with the existing safeguard mechanisms.

## Track

Having identified risks that might drive human rights issues and devising appropriate systems to prevent and mitigate them. The next steps comes verification, monitoring and validation of the progress made on the prevention and mitigation mechanism and assessing its effectiveness. The timing of verification, monitoring or validation should correspond to the severity and nature of the issue identified. If through monitoring, it is determined that issues are not being addressed, a verification should be conducted to check whether actions were taken in the first place or not.

## Remediate

The core purpose of conducting due-diligence is to avoid harm. Thus it is imperative that a formalised process is established through which individuals or groups can raise concerns. We have established an Ethics Helpline Portal (<https://www.arvind.ethicshelpline.in/portal/en/home>) that can be used to report any suspected or confirmed incidents. This portal is managed by a third-party to ensure an independent, impartial and neutral party receive any concerns.

## Communicate

The last step in the due-diligence process is Communication which should be done annually at a minimum. The communication will include details about the due diligence processes, including how we have addressed potential and actual harm. We will ensure that our communication is relevant, accurate, current, clear, user friendly and enables intended users to use information.

## Annexure I

S. No.	Focus Area	Yes / No
1	<b>No Forced Labour or Modern Slavery</b>	
1.1	Has there been any instances of forced or bonded labour?	
1.2	Are you allowed to leave your workplace ?	
1.3	Are you allowed to take necessary breaks?	
1.4	Are you employed voluntarily?	
1.5	Do you have the freedom to terminate your employment?	
1.6	Does your employer withhold any part of your salaries, benefits, property or documents in order to oblige you to work?	
1.7	Does the farmer take a deposit or fee for any other reason?	
1.8	Does the employer provide you with any loans?	
1.9	Are you obligated to work in order to repay your debt?	
1.1	If needed, can you visit the doctor during working hours?	
1.11	Does the employer make payments to you on time?	
2	<b>Child Labour</b>	
2.1	What is the age of the youngest worker in the facility?	
2.2	Does the facility have a remediation system in place for when children (those under the legal minimum working age) are found to be working in the facility?	
2.3	Has there been any instances of children below the age of 15 working in your facility?	
2.4	Has there been any instances of young workers conducting work that jeopardizes their physical, mental or moral wellbeing or which hinders their education?	
3	<b>Freedom of Association &amp; Collective Bargaining</b>	
3.1	Does the workers have the freedom to form and join any trade union and/or worker association?	
3.2	Are you a part of a trade union/worker association or participating in such activities?	
3.3	Does facility management regularly meet with union/ worker association to proactively address issues of worker concern?	
3.4	Does the employer allow workers to carry out trade union activities in accordance with applicable legal requirements?	
3.5	Are there any instances of critical communication breakdown between you and employer which may have lead to serious conflict or abuse?	
3.6	Is any adverse actions taken against you by the employer because of your part in trade union/ worker association?	
3.7	If there is a union, does the facility refuse to bargain collectively or refuse to bargain in good faith with the union?	
3.8	If there is a union, does the facility Inform all workers about CBAs and provide copies in line with legal requirements?	
4	<b>Sexual Harassment</b>	
4.1	Have you faced any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that creates an intimidating, hostile, degrading or offensive environment for work	
4.2	Does the facility have effective remediation processes in place to address cases of harassment or abuse?	
4.3	Do you feel you have been pushed or forced to do anything differently because of your experience of sexual harassment?	
5	<b>Equal Remuneration</b>	
5.1	Do you receive equal wage for the same work in comparison to other gender / race / age / colour / religion etc.?	

<b>6</b>	<b>Discrimination</b>	
6.1	Have you faced any discrimination or abuse on grounds of race, sex, age, colour, religion, political opinion, national extraction or social origin?	
6.2	Are you treated equally in comparison to the other gender / race / age / colour / religion etc.?	
6.3	Does the employer provide unbiased and equal access to work, wages, benefits etc. to all workers?	
<b>7</b>	<b>Workplace Safety</b>	
7.1	Are you required to lift, carry, push or pull any load which could harm you?	
7.2	Are building/construction, structural safety and fire permits and certificates in line with legal requirements?	
7.3	Do you know what to do in case there is an health and safety emergency / accident in the premise?	
7.4	Does adequate protective measures are provided to minimize any potential risk ?	
7.5	Does the employer provide you safety instructions for handling mechanical and electrical equipment's?	
7.6	Has the facility conducted a health and safety risk assessment In line with legal requirements?	
7.7	Is there a written occupational health and safety policy in line with legal requirements?	
7.8	Is the facility is equipped with first aid kit, fire extinguisher etc.?	
7.9	Does the facility have an occupational safety and health (OSH) committee?	
7.10	Does the facility conduct regular emergency drills for all workers in line with legal requirements?	
7.11	Does the facility record work-related accidents and diseases and report them to the competent authority in line with legal requirements?	
<b>8</b>	<b>Data Privacy</b>	
8.1	Do you have a mechanisms are in place to ensure effective implementation of your company's privacy policy?	
8.2	Does your company inform customers on nature of information collected, use of collected information and how it is protected?	
8.3	Have you received any complaints concerning breaches of customer privacy?	