



SUGMYA FINANCE PRIVATE LIMITED

Human Rights Policy

Purpose	This policy document provides a broad framework to ensure that all employees are treated with respect and dignity and common set of principles that apply to our business practices to ensure that we do not condone human rights violations or abuses
Version	1.0
Author	Policy Committee
Date	20th May 2022

Policy Owner Ship	Head- HR
Effective Date	11 August 2022

Policy Approval	Board of Directors- Sugmya finance
Date	11 August 2023

Contents

Introduction	3
Scope & Applicability	3
Details of the areas mentioned in the scope.....	3

Introduction:

Respect for human rights is an essential value of Sugmya Finance Private Limited ("Sufinn"). We make every effort to respect and promote human rights in accordance with the internationally recognized human rights principles and standards. This is our focus in our relationships with our employees, our customers, and the communities in which we operate, and is the foundation of our Human Rights Policy.

SUFINN's Human Rights Policy aligns with our Code of Conduct, Business, and Environmental policies covering diversity, environment, health and safety, and employee relations. Sufinn is dedicated to the principle that all persons should be treated with respect.

Scope & Applicability:

The Policy covers the following issues that are relevant to our business and is applicable to all our stakeholders who deal with us.

1. Safe & healthy workplace
2. Diversity and Inclusion
3. Equal Opportunity
4. Fair Practices in employee life cycle
5. Working hours, wages & benefits
6. Community and Stakeholder Engagement
7. Abuse of Managerial Authority
8. Human Dignity and Security Services
9. Child Labour, Forced Labour and Human Trafficking
10. Communication and Awareness
11. Redressal and Reporting Mechanism

Code of Conduct and Other Related Policies
Review and Governance

Details of the areas mentioned in the scope:

1. Safe & healthy workplace:

Sufinn recognizes that a harassment-free workplace is integral to helping the workforce bring their whole selves to work. We are committed to respecting the rights of all our employees and strive to provide them with a work environment that's free from any physical, verbal or psychological harm. Our policies and systems have been designed to prevent such instances and address them in case they do arise.

To work effectively, all of us need a healthy and safe work environment. SUFINN prohibits the following forms of unhealthy practices.

- All forms of substance abuse
- Use or distribution of drugs, smoking and alcohol while at work/at all times in our workplace
- Possession and / or use of weapons / firearms or ammunition while on business of the Company is prohibited

- Using abusive and foul language with internal and external stakeholders

All of us should be safe at our place of work. Employees must strive to keep their own workplace and surroundings clean and hygienic. Should you observe any unsafe situations at work, please reach out to the Human Resources Department.

2. Diversity and Inclusion:

At Sufinn, we value diversity and believe that a diverse workplace builds a competitive advantage. We are committed to a culture that is rich in diversity, is equitable with respect to every individual's life journey, and where every individual is able to thrive in an environment that fosters inclusion. We believe that a respectful workplace is one that encourages trust, responsibility, accountability, mutual respect, open communication and embraces the dignity and diversity of individual.

3. Equal Opportunity:

Sufinn believes in Equal employment opportunity. At Sufinn, we strive to provide a work environment free of discrimination and harassment. Our employment decisions are based on merit and business needs. Every employee in Sufinn will be given roles and responsibilities based on his or her position for which he/she has been recruited. The compensation of the employee will be determined based on industry standards, keeping in view, the statutory norms currently in practice. We are committed to following fair employment practices that provide equal opportunities to all employees. We do not discriminate or allow harassment based on race, colour, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status.

4. Fair Practices in employee life cycle:

Sufinn is committed to ensuring that our workplace is free of discrimination and prejudice. In keeping with the same, we adhere to, and regularly update specific metrics to ensure fairness in our decisions related to hiring, promotion, remuneration and benefits. We shall adhere to all relevant laws and regulations and provide equal opportunity for professional growth to our employees. Sufinn is committed to creating such an environment that fosters the full potential in all employees, which, in turn, contributes directly to the success of the company. We ensure that staff recruitment, selection, recognition, and career development processes are fair and transparent.

5. Working hours, wages & benefits:

The compensation of the employee will be determined based on industry standards, keeping in view, the statutory norms currently in practice. We are committed to following fair employment practices that provide equal opportunities to all employees ensuring prompt attendance and timekeeping. We work to ensure full compliance with applicable wage, work hours and benefits. We ensure to provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws.

6. Community and Stakeholder Engagement:

Among others, we view the following constituents as stakeholders in our Human Rights Policy: Shareholders, Employees, Customers, Communities/Neighbours, Contractors, Producers / Vendors / Suppliers, Governments, and applicable Union.

We recognize that we are part of the communities in which we operate, and that at each location there are several overlapping "communities." Sufinn is committed to associating with Stakeholders who share our values of integrity, fairness, honesty, and respect for all individuals. Our aim is to ensure through dialogue that we are listening to, learning from, and considering their views as we conduct our business. We believe that local issues are typically best addressed at the local level.

7. Abuse of Managerial Authority:

Sufinn encourages conducive work environment with amicable and professional work relationship between the managers / supervisors and their subordinates.

SUFINN considers following actions by reporting manager as abuse of managerial authority:

- Providing preferential treatment to employees
- Creating employee discomfort through threat of retrenchment or replacement
- Creating an interfering, intimidating or offensive work environment
- Humiliating an employee in front of his colleagues
- Condescending attitude towards employees
- Withholding / not sharing of critical information relevant to the employee
- Prioritizing personal interests before the company.
- Enforcing company policies and rules on others without following them

8. Human Dignity and Security Services:

At SUFINN, we strive towards ensuring that people are treated with respect and dignity leading to professional work culture and employee friendly work practices. We encourage work environment characterized by open and candid communication, respecting the views and opinions of all employees. Our actions are aimed towards fostering employee trust and transparency.

We believe in ensuring adequate resources for human rights management with well-defined responsibilities and accountability. We aim to measure our human rights performance by inculcating good practices and establishing adequate monitoring and reporting practices.

With respect to security guards that SUFINN hires through various service providers, SUFINN will aim to ensure that these guards are trained in human rights awareness and will be guided by the principles of proportionality and good international practice in relation to hiring of service providers, rules of conduct, training, equipping, and monitoring, and applicable law. To that end, SUFINN has put in place a detailed implementation framework that will guide SUFINN's employees and govern the hiring of security service providers (please see Annexure A – Implementation Framework for Human Dignity and Security Services Policy).

9. Child Labour, Forced Labour and Human Trafficking:

SUFINN will not employ child labour. The company prohibits the hiring of individuals under the age of seventeen (17) or the local legal minimum working age or the compulsory schooling age, whichever is higher. SUFINN will ensure age verification for all applicants as part of its hiring process.

SUFINN will not use any type of forced, slave or involuntary labour, whether bonded, prison, military, compulsory, or indentured labour, including debt servitude or human trafficking with respect to any aspect of its operations.

Over and above not employing or utilizing child or forced labour itself, SUFINN will also aim to ensure that its clients/borrowers are regularly educated on the risks of using child or forced labour, and encourage SUFINN's employees to identify and report any suspicions of child or forced labour by borrowers (Please see Annexure B – Implementation Framework for Child Labour, Forced Labour and Human Trafficking Policy).

10. Communication and Awareness:

SUFINN will ensure adequate training and awareness sessions for new hires as well as existing employees on a continual basis. SUFINN's learning management system allows creation of various learning modules and assessments to inculcate the required trainings and measure the employee awareness on the policy elements.

Code of Conduct and Other Related Policies

All employees are required to adhere to our Code of Conduct which mandates tenets for them to follow. These include aspects on fair and equitable treatment of co-workers and other stakeholders that they interact with. In line with our commitment to provide our employees a safe workplace, we have the Prevention of Sexual Harassment of Women at the Workplace (POSH) Policy. We have established a robust Whistle blower Policy and vigil mechanism that is overseen by the Board. Our Whistle blower Policy is available for all our stakeholders to report any suspected or actual occurrence of illegal, unethical or inappropriate actions, including – but not limited to – human rights violations. These policies represent, in the truest sense, our intent to conduct our business with the highest standard of ethics, integrity and social responsibility. We remain committed to building on our current policies and practices to remain responsive to our dynamic organizational environment and any emerging expectations of our stakeholders.

Redressal and Reporting mechanism:

We strive to create workplaces in which open and honest communication among all employees is valued and respected. The Company is committed to complying with applicable labour and employment laws wherever we operate. In addition, we work to achieve full employee engagement as the foundation of our mutual success; strive to create a culture that champions respect and inclusion; offer competitive wages and benefits; and implement clear health and safety practices.

How and where to complaint?

If any employee feels that they have been discriminated against, harassed or have not been given equal opportunities at work, they are encouraged to submit a complaint to:

- Immediate Manager
- Skip Level Manager
- Employee Grievance Cell
 - Contact E-Mail: grievance@sufinn.com
 - Contact Number: xxxxxxxxxx
- Human Resources Department
 - Contact E-Mail: sarika.bhatiani@sufinn.com
 - Contact Number: xxxxxxxxxx

All complaints to the Employee Grievance Cell and Human Resources Department will be treated on a strictly confidential basis.

Review

This policy will be reviewed periodically and updated as necessary.

Final Authority

When there is any conflict or any ambiguity in regard to the policy, then the decision of management would be final and shall not be called upon for questioning.

Amendments

The Management reserves the right to amend, modify or revise this, Policy.

General:

This policy supersedes all other policies, procedures, and practices prevalent on this subject till date. Company reserves the right to add to, alter or amend, or cancel this policy at its discretion if needed in future.
