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**HUMAN RIGHTS POLICY**

**VERSION NUMBER: 2.0**

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## **1. INTRODUCTION**

At AM/NS India ("AM/NS"), we recognize the responsibility we have as a business to protect the human rights of the people we impact through our operations. AM/NS respects and protects human rights both within and outside the workplace. We respect and support the dignity, wellbeing, and human rights of all our stakeholders. We are committed to upholding human rights across our value chain.

AM/NS India Human Rights Policy ("Policy") expresses our responsibility and commitment to uphold all human rights in accordance with the Indian Constitution, National and State laws and United Nations Guiding Principles on Business and Human Rights (the UNGPs). This Policy also focuses on the areas that have been identified as industry priorities.

This policy is based on the following foundational documents.

- **Indian Constitution**
- **National & State Laws**
- **International Human Rights Declaration:** The Universal Declaration of Human Rights by the United Nations (UN), along with the two International Covenants constituting the International Bill of Human Rights; The Declaration of Fundamental Principles and Rights at Work by the International Labour Organization (ILO); The United Nations Global Compact.
- **Social Accountability Standards (SA8000)**

## **2. PURPOSE**

The goal of this Policy is to establish clear principles that will guide our actions and behaviour in relation to human rights. The Policy and its accompanying practices will continue to evolve as AM/NS remains committed to fostering a human-rights-compliant environment. It also seeks to prevent any participation in activities that directly or indirectly violate human rights.

## **3. SCOPE**

This Policy applies to AM/NS and its subsidiaries, employees, vendors, customers, partners across our supply chains, and subcontractors who work at our locations.

We will actively promote the principles outlined in this Policy to our subcontractors and suppliers via our Code of Conduct, and we will engage our customers in human rights discussions.

Furthermore, the human rights aspects of various other company policies and guidelines are consolidated and incorporated into this Policy.

It includes our Code of Conduct, Health and Safety Policy, Anti-Bribery and Anti-Corruption Policy, Whistle-blower Policy, Diversity & Inclusion Policy, Maternity benefits & beyond Policy, Policy against Sexual Harassment and Sustainability Policy.

We adhere to the laws of the countries in which we operate and are committed to compliance with all applicable legal requirements while implementing this, Policy.

## 4. SPECIFIC COMMITMENTS AND PROVISIONS

### 4.1 Commitments to Stakeholders:

**Employees:** We are committed to protecting the dignity, wellbeing and human rights of all our employees, including the fundamental rights enshrined in the Indian Constitution, where applicable. Our employment policies are designed to ensure that the relevant principles outlined in the International Human Rights Declarations are consistently implemented across all our operations. We are committed to train our employees and promote human rights awareness at workplace and in the local communities directly impacted by our operations.

**Business Partners:** We strive to respect and promote human rights when working with subcontractors, suppliers, vendors, customers, joint ventures, and other partners. This is accomplished through proactive engagement, monitoring, certification, and inclusion of contractual provisions. Business partners who operate in areas which we have identified as most significant risks are being monitored proactively to avoid any deviations from this Policy.

**Local communities:** We are committed to protecting the human rights of local communities that may be impacted by our operations. Through inclusive and open dialogues with those impacted by our activities, we hope to gain a better understanding of the cultures, customs, and values that exist in these communities. Our dialogue process prioritises marginalised and underrepresented groups, such as women, children, and indigenous people. In the event of any unforeseen circumstances, AM/NS will strive to work with the government and local bodies to protect human rights of local communities while also protecting the company's employees and assets.

### 4.2 Specific Provisions:

#### A. Employees:

**Health, Safety and Wellbeing:** AM/NS is committed to creating a workplace environment free of accidents and injuries, and it prioritises the well-being of its employees. Our Health and Safety Policies and Procedures embody our safe sustainable steel philosophy. We implement comprehensive measures to maintain safe working conditions and mitigate occupational hazards.

**Fair and Equal Treatment and Zero Tolerance to any form of discrimination in the Workplace:** AM/NS adheres to the principle of fair and equal treatment for all employees, without discrimination. AM/NS is committed to providing every employee and prospective employee with fair and dignified treatment. Any form of unlawful discrimination is strictly prohibited, whether based on nationality, age, gender, differently abled, place of residence, national or ethnic origin, colour, religion, language, caste, race, marital status, place of birth, ethnicity, political or other opinion, or any other basis.

All employees have equal opportunities for advancement, and the company fosters an inclusive and discrimination free workplace for all our employees.

**Ensuring Fair & Just treatment for person with Disability:** An employee's grade or rank shall not be terminated or downgraded if they become disabled while serving. If an employee is unable to perform the duties of their current position due to an acquired disability, they will be transferred to another role with the same pay scale and service benefits. We are committed to creating an inclusive and

accessible work environment that respects the rights and dignity of differently abled individuals (Divyang), while also providing equal opportunities for employment and advancement.

**Elimination of Discrimination against employees with HIV/AIDS:** Any employee with HIV/AIDS will not be subject to discrimination at work in terms of promotion, skill and rank advancement, or other privileges and benefits. An HIV-positive employee will continue working at their current capacity unless medical issues hinder them from conducting a particular task at hand, in which case, the company will make provisions for suitable alternatives. Additionally, AM/NS will comply with and implement all applicable government policies regarding HIV/AIDS.

**Elimination of Forced Labour, Child Labour, Human Trafficking and Modern Slavery:** AM/NS strongly opposes all forms of forced and compulsory labour, child labour, human trafficking, and modern slavery as well as debt bondage in its operations and supply chain. We work actively with subcontractors and suppliers, conducting due diligence to avoid direct or indirect involvement in any such illegal practice.

**Elimination of Harassment and Violence:** AM/NS promotes a work environment free of harassment, exploitation, abuse, and violence, as defined by applicable laws.

**Maintaining Working Conditions:** AM/NS complies with all employment laws and regulations, including standard and overtime working hours, and honours employment agreements reached with employees.

**Facilities and Amenities:** AM/NS ensures that its buildings, furniture, and infrastructure meet the requisite accessibility standards, providing inclusive facilities and amenities to all individuals.

**Fair & Timely Compensation and Remuneration:** AM/NS strives to provide fair and timely wage to all employees based on local market assessments and minimum wages guidelines mandated by the State laws.

**Respecting Privacy:** AM/NS strives to limit activities like tracking, monitoring, and security protocols that may breach individual privacy. The company takes steps to ensure that, upon request, employees are informed of the personal information the company has on them and where it is kept. We respect an individual's right to privacy. Personal information is protected in accordance with applicable laws and regulations.

**Human Rights Inclusion in Contractual Arrangements:** AM/NS includes human rights-related requirements in contractual agreements with its Tier-1 partners, emphasising the importance of human rights compliance throughout the supply chain. AM/NS also ensures non-complicity in any event of human rights violation by a third party.

**Recognizing the Freedom of Association:** AM/NS upholds the right to association, participation, and collective bargaining of all employees without any fear of intimidation, reprisal, or termination. The company prohibits interference in any manner with the formation, administration, or functioning of a worker's association.

**B. Workplace Women Empowerment:**

**Maternity Leave:** AM/NS provides women with maternity leave for the duration stated in the Maternity Benefit Act of India. There will be no risk of termination for women during the stipulated period and beyond. In the event of any illness or concern associated with childbirth or pregnancy, AM/NS will grant additional leave in line with our policy “Together for tomorrow: Maternity benefit and beyond”.

Furthermore, AM/NS provides flexible work arrangements to support transition of women back to work after maternity leave like work from home and flexible work hours as per the Maternity Benefit Policy.

**C. Community:**

**Avoiding Forced/Involuntary Resettlements of Local Communities:** AM/NS works to stop forced relocations. When resettlement is unavoidable, we agree to abide by the regional or national authorities' requirements and laws for resettlement and rehabilitation. We are committed to respecting and addressing land rights issues, including engaging in fair settlements, and supporting the rehabilitation of affected communities.

AM/NS actively engages with local communities, putting a high priority on their inclusion and participation in various areas. Through social activities, sports, neighbourhood initiatives, healthcare initiatives, support for self-help groups, and educational opportunities, we put a lot of effort into fostering a sense of belonging and empowerment.

**Indigenous Peoples' Rights:** We acknowledge and respect indigenous communities' rights, engaging in meaningful consultation and collaboration with them to ensure their voices are heard and their rights are protected.

**Migrant Workers' Rights:** We protect migrant workers' rights by promoting fair and ethical treatment, safe working conditions, and access to essential services.

**Encouraging Social Activities:** We encourage residents to take part in social activities by offering forums for conversation, cultural exchange, and understanding.

**Promoting Sports and Recreation:** AM/NS promotes community participation in sports and leisure activities, fostering opportunities for individual growth, teamwork, and physical well-being.

**Supporting Activities in the Community:** We support and actively take part in community-driven initiatives that address regional needs and aspirations, encourage sustainable development, and improve people's quality of life in general.

**Support for Healthcare:** AM/NS works to increase residents' access to healthcare services by facilitating initiatives and programmes that advance health, disease prevention, and well-being.

**Support for Self-Help Groups:** To help community members improve their livelihoods and financial independence, we encourage entrepreneurship, support local self-help groups, and provide training, mentoring, and financial assistance.

**Education Initiatives:** AM/NS is committed to advancing education in local communities by working with schools, colleges, and educational organisations to increase access to programmes that promote skill development, vocational training, and quality education.

**Choosing Appropriate Security Measures:**

AM/NS is dedicated to making sure that our security measures and interactions with both public and private security forces comply with local laws as well as standards and guidelines from other countries. To strike a balance between security and the observance of human rights, we will adjust our security arrangements, as and when required.

**Creating Sustainable Circular Economy Practices for Land, Water, and Materials**

We recognise the importance of having access to clean air and water, and we strive to minimise our operations' impact on the environment and local communities.

AM/NS is committed to creating sustainable methods for using land and water while embracing the circular economy ideals. We want to minimise waste and promote responsible resource management by coordinating our operations with emerging international standards. These procedures are carried out in a way that respects human rights and works towards a more sustainable future.

## **5. ADMINISTRATION, GOVERNANCE, AND ACCOUNTABILITY**

AM/NS will be responsible for setting up processes and systems for the administration and governance of this Policy. This Policy is administered by our human resources division, and the senior leadership of the organization.

AM/NS will also set up a committee to ensure administration, governance, and compliance with respect to this policy. This committee will oversee the following:

- 1) Establishment and revision of Human Rights policy at a regular frequency
- 2) Establishment of the human rights management execution plan,
- 3) Evaluation of the human rights risk,
- 4) Operation of the grievance channel, and
- 5) In-house education and reporting as well as external communications.

## **6. IMPLEMENTATION OF THE GRIEVANCE PROCEDURE**

To support the implementation of this Policy, the departments of Procurement, Safety, Human Resources, Internal Audit, Legal, Corporate Social Responsibility, Corporate Affairs, Information Technology and Environment are crucial.

Employees are encouraged to immediately raise alarm, report to **EthicsLine** if they learn of any human rights hotspots through the process established by the company. Alternatively, they may also reach out to senior leaders in charge of the business division, Internal Audit, and Human Resources teams who in turn are obliged to take it up with the Human Rights committee for proper redressal and resolution.

AM/NS will with reference to court precedents, regulations of relevant government agencies, past internal practices, and other industrial practices, strive to identify the best course of remedial action



with support from the legal department. If the cases of human rights violence exercise significant influence on fundamental rights of victims or it is highly likely to create risks to the corporate reputation, the relief plan may be discussed by a committee, management conference, practical meeting, and gatherings in which the highest decision makers participate.

This Policy acts as the overarching framework for all other standards and practises that AM/NS may create as necessary to address human rights issues.

## **7. REPORTING**

We are committed to disclosing publicly how well our initiatives and processes are performing in relation to this Policy. This will be accomplished through our Annual Review or any other statement that may be necessary in accordance with applicable laws.

Executives and employees of AM/NS must not disclose, reveal, or otherwise report any personally identifiable information that may be used to identify a reporter. All information relating to victims, incidents, remedial procedures, and outcomes, as transmitted during the reporting and notification process, must be kept strictly confidential. In addition, measures must be implemented to protect employees from adverse consequences arising from the reporting of human rights violations and risks. However, the complaint investigation results to be made available to the affected party upon request as necessary in accordance with applicable laws.

## **8. MONITORING AND REVIEW**

For continued suitability and effectiveness, AM/NS will review the Policy and our implementation efforts on a regular basis. Due to ongoing monitoring and review, we can intend to proactively identify areas for improvement and make the necessary adjustments to our strategy.

## **9. EDUCATION & AWARENESS**

At AM/NS we recognize the importance of establishing a two-way communication with employees to reduce the risk of human rights abuse. Therefore, we strive to create human rights awareness among our employees through workshops on subjects like diversity and inclusion, understanding conscious and unconscious bias, gender sensitisation and other topics covered under this Policy.

Through human rights education, we intend to promote a discrimination free work environment and encourage aggressive reporting of detected cases and risks of human rights violation.

## **10. RISK MANAGEMENT**

**Identification and Assessment:** AM/NS is committed to conducting periodic risk assessments to identify the areas of actual and potential human rights violation risk. The scope of the risk assessment should include risk assessments of internal business operations and processes, as well as that of external stakeholders, including business partners and local communities. The objectives of a risk assessment are to assess the probability of an undesirable event happening, the degree of severity if it did, and rank the risks to prioritise actions and operational measures to manage them. Accordingly, appropriate remedial, or preventive actions will be taken in a timely manner.



**Information Disclosure:** AM/NS will maintain records of risk management procedures, including timelines, root causes, the corrective and preventive actions taken, and implementation results. The reports and records will be shared with decision-makers and other concerned departments for review to enhance the effectiveness of human rights and risk management. Further, the company will disclose evaluation and implementation results and make them accessible to employees, partners, and other stakeholders as may be necessary in accordance with applicable laws.

**Approved by**



**Dilip Oommen**  
**Chief Executive Officer**  
**ArcelorMittal Nippon Steel India Limited**

28 October 2024

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