


Kewaunee Labway Private Limited

Human Rights Policy

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Reviewed by (VP- Finance, Treasury and Compliance)	<i>Ravi Tibrewal</i>
Approved by (Managing Director)	

1.0 Introduction

Kewaunee Labway India Pvt. Ltd. (Kewaunee or the Company) is dedicated to upholding the internationally accepted human rights principles and is committed to advancing them in all aspects of its activities. This strategy is entirely consistent with the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the ISO 26000 standards of social responsibility.

Kewaunee has a tremendous dedication to safe and inclusive working conditions, fair labour practices, ethical and responsible sourcing, gender equity, employee well-being, community engagement, and environmental sustainability. The company is supported by international standards like ISO 45001 and ISO 14001, which reinforce its commitment of the company to ethical, responsible, and sustainable business practices.

2.0 Scope

This policy applies to all the employees, contract workers, suppliers, distributors, business partners, service providers, and other stakeholders operating within Kewaunee's sphere of influence. It extends across all business locations, supply-chain interactions, and operational activities connected to the Company.

3.0 Principles

These principles are inherent to every individual simply by virtue of being human.

- Human rights are universal and apply equally to all individuals without distinction or discrimination of any kind.
- They are inalienable and cannot be surrendered, transferred, or taken away except under due process aligned with international standards.
- Human rights are indivisible, with all rights holding equal value and importance.
- Human rights are interdependent and interrelated, where the fulfilment of one right contributes to the fulfilment of others.
- Human rights are grounded in equality and non-discrimination to ensure fair and equal treatment for all persons.
- Human rights require participation and inclusion, allowing individuals to engage in matters that affect their rights and well-being.
- Human rights rely on accountability and the rule of law, ensuring duty-bearers are responsible for respecting and protecting rights and that individuals have access to remedy in the event of violations.

4.0 Definitions

- **Human Rights** - Basic rights and freedoms inherent to every person, protected under international and national laws.
- **Employees** - Any individual in a relationship recognized as an "employment relationship" in national law or practice
- **Workers** - Any person who performs work, whether an employee (2.5) or someone who is self-employed

- **Due Diligence** - Comprehensive, proactive process to identify the actual and potential negative social, environmental and economic impacts of an organization's decisions and activities over the entire life cycle of a project or organizational activity, with the aim of avoiding and mitigating negative impacts
- **Business Partners / Value Chain** - Suppliers, vendors, contractors, customers, service providers, and any external party connected to the company's operations.
- **Discrimination** - Unequal or unfair treatment of an individual based on personal characteristics or identity.
- **Harassment** - Any unwanted behaviour that intimidates, humiliates, abuses, or creates an unsafe or hostile environment, including sexual harassment and bullying.
- **Forced Labour** - Work performed involuntarily under threat, coercion, restriction of movement, or exploitation, including human trafficking.
- **Child Labour** - Engagement of individuals below the legal minimum working age or compulsory schooling age (whichever is higher).
- **Freedom of Association** - Workers' right to join unions or representative groups and engage in collective bargaining without interference or retaliation.
- **Health & Safety** - Conditions and practices that protect the physical and mental well-being of workers at the workplace.
- **Human Rights Due Diligence** - A process to identify, prevent, mitigate, and address actual or potential negative human rights impacts.
- **Adverse Human Rights Impact** - Any negative effect on the rights, dignity, or well-being of individuals or communities due to business activities.
- **Remediation** - Measures taken to resolve or compensate for harm caused or contributed to by the company.
- **Grievance Mechanism** - A formal channel for individuals to report human rights concerns and receive fair, timely, and confidential resolution.

5.0 Policy Commitments

- **Respect for Human Rights**

All people's inherent rights, freedoms, and dignity including their civil, political, economic, social, and cultural rights are respected, valued, and safeguarded. Human rights continue to be at the centre of our business practices as we work to cultivate a culture of accountability and respect in every area of our operations.
- **Non-discrimination and diversity**

We are committed to upholding an atmosphere devoid of discrimination in any form. Discrimination based on race, colour, gender, religion, national origin, caste, ethnicity, age, disability, marital status, sexual orientation, political beliefs, social background, or any other identity or status is not acceptable to us. We regularly assess our operations to identify and eradicate discrimination, both direct and indirect, and make sure that our internal and external relationships don't support discriminatory behaviours.
- **Freedom of expression and association**

We respect and uphold the right to freedom of opinion, peaceful assembly, and association, including the right of workers to form and join trade unions or representative bodies of their choice, free from interference or retaliation. We commit to engaging with such bodies in good faith wherever they exist, and in regions where freedom of association is legally restricted, we support alternative mechanisms for worker representation. These principles are further detailed in our Freedom of Association procedures ([link](#)).
- **Safe and healthy workplace**

The safety, well-being, and physical and emotional health of all our personnel are of utmost significance to us. To provide secure working conditions and a healthy work environment, we abide by all relevant national and municipal health and safety laws. Workers have the freedom to decline hazardous labour without prior authorization and are encouraged to report safety problems without fear of reprisal. Our Health & Safety Policy ([link](#)) provides more information about the processes that track, manage, and report occupational diseases and injuries that underpin our approach to workplace safety.

- **No forced or child labour**

We enforce a strict prohibition against forced labour, bonded labour, child labour, and human trafficking. All workers engaged directly or through suppliers must be at least 15 years of age or meet the applicable legal minimum age for employment and compulsory education, whichever is higher. We protect the rights and welfare of young workers in accordance with the legal regulation of the location we operate in.

- **Human rights due diligence**

We conduct ongoing human rights due diligence in alignment with international frameworks and leading standards. We commit to identifying, preventing, mitigating, and accounting for actual and potential adverse human rights impacts across our business and value chain. Our due diligence approach includes, but is not limited to:

- Integrating human rights risk into our Enterprise Risk Management (ERM) systems, with board-level oversight.
- Conducting routine risk assessments, performance reviews, and Human Rights Impact Assessments (HRIAs).
- Embedding human rights considerations into workplace safety, supplier evaluation, recruitment and employment practices, and operational decision-making.
- Maintaining accessible grievance mechanisms and implementing corrective action plans where required.
- Driving continuous improvement through stakeholder engagement, industry benchmarking, audits, and third-party assessments.

- **Responsible business relationships**

We are committed to conducting business with integrity, transparency, and respect for people and the environment. To uphold responsible business conduct:

- We work to understand the human rights, environmental, and social conditions associated with the goods and services we procure.
- We do not knowingly collaborate with entities that are involved in human rights violations or use products/services for such purposes.
- We seek to prevent negative human rights impacts on communities and support equitable access to essential goods and services wherever relevant.
- We monitor and evaluate suppliers, contractors, and business partners to ensure alignment with recognized human rights and labour standards.
- We publicly communicate, where necessary, our stance against human rights abuses, including discriminatory or exploitative labour practices.
- We avoid complicity in land displacement environmental degradation, or resource exploitation without due process, informed consent, and fair compensation.

- **Security practices and human rights compliance**

We ensure that all security personnel, whether directly employed or contracted, are appropriately trained on human rights principles and expected conduct. Any concerns or grievances related to security practices are handled promptly, objectively, and transparently to prevent violations and build trust with workers and surrounding communities.

- **Grievance and remedy mechanisms**

We support and enable access to remedy wherever we have caused or contributed to adverse human rights impacts. Where human rights violations are linked to our business relationships, we advocate for responsible parties to provide appropriate remediation.

Our grievance mechanisms are designed to be legitimate, accessible, predictable, equitable, transparent, rights-compatible, and based on dialogue. These mechanisms are available to all relevant stakeholders including employees, suppliers, and affected communities to facilitate prompt and fair resolution and provide remediation where needed. Detailed procedures are outlined in our Grievance Policy ([link](#)).

6.0 Training and Awareness

Kewaunee Labway India Pvt Ltd shall make sure that all workers and business associates are aware of and respect the company's human rights policies. Training on human rights, non-discrimination, workplace dignity, and grievance procedures shall be provided to all employees, including contract workers and new hires. Supervisors, HR, procurement, HSE teams, and security personnel shall receive specialized training according to their roles.

The Human Rights Policy and Supplier Code of Conduct standards shall be communicated to suppliers and business partners through orientation or awareness programs, and training materials must be made available in pertinent languages and accessible formats.

Periodically, refresher courses shall be held to strengthen knowledge and promote ongoing development, and records of attendance and completion shall be maintained to guarantee responsibility. Kewaunee shall cultivate an environment in the workplace where human rights are recognized, valued, and actively defended through regular training and awareness campaigns.

7.0 Monitoring and Reporting

Kewaunee shall maintain vigilant tabs on and report about how our human rights policy is being implemented throughout its activities and value chain. Employees and teams must promptly report any potential risk or violation, and all departments and partners must monitor and record human rights performance. Grievance procedures shall allow anonymous, private reporting without worrying about reprisals.

Training, supplier management, policy updates, and continuous improvements shall all be strengthened by the official documentation and review of all incidents, investigations, and corrective actions. The Board and senior management shall get periodic monitoring reports to guarantee efficient supervision and decision-making.

8.0 Continuous Improvement

We remain committed to the ongoing improvement of our human rights practices, and accordingly our systems, processes and initiatives shall be periodically reviewed and reinforced to ensure effectiveness, alignment with international standards, regulatory requirements and stakeholder expectations.