



Human Rights Policy

Adopted from IHCL's Human Rights Policy

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1. Introduction

Human rights, also defined as universal rights, are inherent to all of us, regardless of nationality, ethnicity, religion, or any other status. These Human rights are an indispensable part of the catering industry. Recognizing the risk of adverse impacts on human rights and mitigating them has become a fundamental corporate responsibility.

Taj SATS, as one of India's strongest catering and brands across the country and a business leader in the industry recognizes it's the role in protection of human rights. We are also an integral part of the Tata Group representing the hospitality arm of the group.

As part of a foremost value-based corporation, we are guided by our groups code, Tata Code of Conduct, which is a bedrock on which we base our commitment to our stakeholders. Driven by our group values and core Taj SATS values of Trust, Respect, Excellence, Pioneering and Collaboration we are committed to respect, protect and promote human rights where we operate including our value chain, employee and workers base and local communities.

This Human Rights Policy serves as a common set of principles to protect and uphold the human rights and manage human rights violations across the Company. As an overarching policy for human rights, the principles of human rights are integrated into various organizational policies. The same should be interpreted in conjunction with our other standalone and group-level policies relevant to human rights.

Our Human Rights Policy is guided by international human rights instruments, such as the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights and National Guidelines on Responsible Business Conduct (NGRBC).

2. Scope and Applicability

This policy is applicable to all employees and our business activities under our direct control.

We encourage and recommend our business partners, including suppliers, vendors, contractors, consultants, customers, distributors, and those representing our company, to adhere to this policy and commit to protect the Human Rights as defined under this policy.

3. Definitions

- a. **"Child labour"** means any work that is mentally, physically, socially or morally dangerous and harmful and interferes with the schooling/education of any child who is below 18 years of age, or the minimum age as defined by the local authority whichever is minimum.
- b. **"Forced labour"** means all work or service which is exacted from any person under the threat of any penalty and for which the said person has not offered himself voluntarily.
- c. **"Harassment"** means any unwanted behaviour, patterns of behaviour, or incidents that are intrusive or persistent and that violate a person's dignity, well-being, or an individual's right

to a respectful environment at work. Harassment also includes committing any of the following acts:

- physical contact and advances involving unwelcome and explicit sexual overtures; or
 - a demand or request for sexual favours; or
 - showing pornography against the will of a woman; or
 - making sexually coloured remarks
- d. **“Retaliation”** means any adverse actions taken by an employer or any other parties against an employee or worker in response to the individual's exercise of their legal rights or reporting of wrongdoing.

4. Policy Statement

Child Labour and Forced Labour

- Taj SATS is committed to implement ethical labour practices across all its operations. We shall unequivocally prohibit the use of forced labour and child labour in any capacity within our operations.
- We shall strictly adhere to regulations on labour which includes child labour (Child Labour (Prohibition & Regulation) Act, 1986) and forced labour (Bonded Labour System (Abolition) Act 1976)
- We shall also respect the fundamental right of all workers to enter and exit employment voluntarily, and we categorically denounce any form of compulsory, forced, indentured, or bonded labour within our workforce.

Diversity, Equal Opportunity, and Non-Discrimination

- Taj SATS is firmly committed to maintaining a working environment that is free from any form of bias or prejudice.
- We shall ensure that all employees and workers are treated with the highest standards of dignity, respect, and fairness, regardless of their gender identity, sexual orientation, race, religion, caste, ethnicity, nationality, age, physical or mental disability, HIV status, marital or domestic partnership status, education background or any other socio-economic status, and sexual Harassment.
- Sexual Harassment: We shall have a strict zero-tolerance policy when it comes to sexual harassment. In the event of any reported incidents, we shall conduct thorough and impartial investigations, providing all parties involved with an opportunity to present their perspectives. If guilt is established, we shall take swift and appropriate action in accordance with our internal policies. Our overarching objective is to cultivate a workplace that is not only safe but also respectful for all.

Freedom of Association and Collective Bargaining

- Taj SATS shall recognize the rights of its workers for collective bargaining as per applicable local laws/regulations/ guidelines.
- Workers/employees are free to exercise their right of freedom of association and collective bargaining without any fear of harassment or intimidation, provided such activities do not create an actual or potential conflict with the interests of our company.

- Taj SATS shall strive to resolve any conflict with the workers by facilitating dialogues and consultations between the employee/worker representatives and group management in adherence to the company policies and procedures.

Environmental Health and Safety

- Taj SATS shall prioritize the safety, health, and well-being of all stakeholders by adhering to established management systems and safety protocols.
- We shall ensure environmentally responsible practices and continuous ESG performance improvement through rigorous incident tracking & investigations, and comprehensive safety training for employees and contractors.

Labour and Compensation

- We shall ensure fair compensation to our workers relevant to our industry and local labour markets by complying with the applicable labour laws on wages, working hours, leaves, overtime and other worker compensation and benefits where we are operational.

Recruitment and Benefits

- Taj SATS shall ensure transparency in its recruitment, compensation, and promotion processes to retain talent and maintain employee motivation.
- We shall prohibit any fraudulent recruitment methods at Taj SATS and ensuring that all terms and conditions of employment and benefits of employment such as Maternity leaves, Paternity leaves, Provident fund etc are clearly communicated to our employees during onboarding.

Employees skill upgradation and career development

- Taj SATS provides equal opportunities to our workforce for various learning and development programs that are relevant to their role in the organization without differentiation on grounds of gender, age, or physical abilities. The programs focus on specific domain areas along with providing learning offerings and interventions. These include training on technical skills, managerial capabilities, process skills, industry-specific knowledge, and leadership development for employees.

Stakeholder Engagement

- Taj SATS is firmly committed to engaging with our stakeholders with respect for their rights and dignity.
- We shall proactively work with our stakeholders to prevent and mitigate any adverse impacts from our operations. We shall strive to implement capacity-building initiatives, provide training, resources, and support to enhance stakeholders' understanding of their rights.
- We shall ensure that various communication channels, including social media, community events, and public forums, are utilized to foster a broader understanding of human rights issues and the importance of the policy's implementation. This steadfast commitment reflects our dedication to building enduring, sustainable relationships with our stakeholders.

Safe Working Environment

- Taj SATS is focused on monitoring and promoting awareness on the safety of our employees.
- We shall ensure to maintain a safe work environment that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

- We shall ensure that adequate security arrangements for employees are provided, as needed, in accordance with the guidelines on Security and Human Rights.

Right to Privacy

- Taj SATS is dedicated to fostering a culture of privacy across the entire organization in order to safeguard the rights and privacy of its stakeholders.
- We strive to establish high standards to protect the privacy rights during the transfer and processing of personal data.

5. Governance and implementation

Responsibility

The implementation of the Human Rights Policy, and all its tenets, is the responsibility of the Chief Human Resource Officer. We have ethics committees and HR heads in our units to whom individuals can directly report issues, and we provide drop boxes for submitting concerns. We have a whistle-blower mechanism in place to handle complaints. Please refer to the Whistle blower Policy for more details.

Furthermore, it is the responsibility of all employees, with designated personnel to adhere to the mentioned policy components. The designated personnel shall oversee its adherence and effectiveness. This includes proactive education, incident handling, and ongoing assessment to ensure our commitment to human rights are upheld at all levels of our organization.

6. Grievance Redressal Mechanism

Procedure

We shall diligently address all issues and concerns raised, while ensuring the thorough documentation of these matters.

We shall strive to conduct impartial investigations, addressing any conflicts of interest that may arise during the process. Following the investigation, we shall communicate the disciplinary actions and remediation measures taken. We are committed to completing the redressal process within reasonable timelines and ensuring ongoing communication to the relevant employees regarding the progress.

If the issue is not resolved through the committee's efforts, applicants have the option to seek resolution through relevant legal authorities.

Grievance Redressal

We shall maintain a comprehensive grievance redressal mechanism designed to enable all stakeholders to raise concerns regarding potential human rights violations. This mechanism shall be overseen by our department leaders, union representatives, HR heads, and members of various welfare committees responsible to resolve any reported issue regarding Human Rights.

We shall have established multiple channels for receiving and resolving grievances. Our partnership with a third-party ethics partner allows for grievance reporting through various means, including phone, email, and physical mail.

Channels for Internal Reporting

022 – 6705 7005
ethics@tajsats.com

Third-party Ethics

Helpline

Web portal

Email

Postal address

India : 1800 102 6969
<https://tajsats.integritymatters.in>
tajsats@integritymatters.in
Taj SATS Air Catering Limited, C/o
Integrity Matters
Unit 1211, CENTRUM, Plot No C-3
S.G. Barve Road, Wagle Estate
Thane West – 400604, Maharashtra,
India

7. Confidentiality and Anti Retaliation

We shall strive to ensure confidentiality in case of any issue or concern raised by maintaining anonymity of the complainant. The reports can be made through our ethics hotline as above.

We shall uphold a strict policy of zero tolerance for any form of retaliation. We shall not accept, endorse, or condone retaliation against any Employee who, in good faith, reports suspected misconduct, asks questions, or expresses concerns. Any individual found engaging in such retaliation, whether directly or indirectly, or encouraging others to do so, may face appropriate disciplinary consequences. We shall treat retaliation cases with the same level of seriousness as alleged policy violations. Anyone who suspects or experiences retaliation should promptly report it to the relevant authorities.

8. Risk assessment and Due Diligence

Our contractual agreements have a mandatory compliance towards the human rights issues, and we shall reserve the right to assess all our operational sites for Human Right risks and conduct human rights due diligence at any or all the value chain partners where such risks are identified.

These risk assessments and due diligence helps us to identify, report and mitigate human rights issues that can impact our business operations.

9. Communication

We shall require all our stakeholders to adhere to our Human Rights Policy. We shall strive to ensure that Human rights training is provided to all our employees. Such training will include Human rights aspects such as identification and reporting of any Human Rights violations, including discrimination and harassment (both sexual and non-sexual), awareness on diversity, gender equality, awareness on employee benefits and rights etc. We shall provide practical examples to facilitate the recognition and awareness of such issues.

In our commitment to transparency and compliance, our policy is publicly accessible on our portal for reference by all stakeholders.

10. Review and Updates

- This policy will undergo periodic reviews to ensure its continued relevance and shall be updated as and when needed.
- Taj SATS shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this Policy and reserves the right to amend this Policy based on changing legal requirements.