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		Rev No.	00
	Title: Human Rights Policy	Effective Date	01-03-23
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1.0.0 Purpose / Objective:

We at Spark Minda (“**Company**”) are committed to upholding and respecting human rights in all our operations and activities. We recognize that human rights are universal and inalienable. We are committed to promoting and protecting these rights within our sphere of influence.

The objectives of our Human Rights Policy (“**Policy**”) include the following:

1. Promoting awareness and understanding of human rights among all stakeholders.
2. Ensuring that human rights are integrated into all policies, procedures and practices.
3. Providing a mechanism for reporting, investigating and addressing human rights violations.
4. Building partnerships with other stakeholders to advance human rights.
5. Monitoring and evaluating the effectiveness of the policy in achieving its objectives.
6. Advocating for the promotion and protection of human rights at the local, national and international levels.
7. Ensuring that those who violate human rights are held accountable and that victims have access to justice and reparations.

We conduct our business in a manner that respects human rights and is consistent with the following international conventions and declaration:

- i. The Universal Declaration of Human Rights
- ii. The United Nations (“**UN**”) Guiding Principles on Business and Human Rights
- iii. The International Labour Organization (“**ILO**”) Declaration on Fundamental Principles and Rights at Work
- iv. The OECD Guidelines for Multinational Enterprises
- v. The ten principles of the UN Global Compact

2.0.0 Scope

The scope of this Policy refers to the areas of concern and action including but not limited to the protection and promotion of fundamental rights and freedoms that are inherent to all human beings, regardless of their race, gender, nationality, religion, or any other characteristic. These rights include civil, political, economic, social and cultural rights, such as the right to life, liberty and security, the right to freedom of expression and assembly, the right to education, healthcare and adequate standard of living and the right to equal treatment and non-discrimination.

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3.0.0 Applicability

Unless otherwise stated, this Policy applies to all the units/verticals/subsidiary or holding companies of the Spark Minda Group. Furthermore, we expect our business partners, including our suppliers and customers, to comprehend and agree with this Policy and cooperate with us in ensuring that their business operations align with it.

4.0.0 Definition of terms/ abbreviation

UN	United Nations
ILO	International Labour Organization
OCED	The Organization for Economic Cooperation and Development
CAG	Corporate Audit and Governance
Committee	GCHRO, CAG Head, Respective Group Functional Head and Respective Business CEO as provided below under the head “ List of Functional Committee Members ”

5.0.0 Guidelines related to Policy

5.1.0 Committing to the Human Rights Principles

The aim of Spark Minda Group is to uphold the human rights of our employees. We are committed to taking appropriate measures to prevent, mitigate and, where necessary, redress any human rights violations that may occur.

Spark Minda’s commitment to human rights include the following principles:

i. Non-Discrimination

We will not tolerate discrimination of any kind, including based on race, colour, gender, sexual orientation, gender identity, religion, age, national origin, disability, or any other characteristic protected by law.

ii. Child Labour

We will not use or support the use of child labour in any of our operations or supply chains. We will comply with all laws and regulations related to child labour.

iii. Forced Labour

We do not use or support the use of forced labour in any of our operations or supply chains. We comply with all laws and regulations related to forced labour.

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iv. Freedom of Association and Collective Bargaining:

We recognize and respect the rights of our employees to freedom of association and collective bargaining. Spark Minda always aims to maintain collaborative and constructive approach with representative bodies of employees to address and protect the interests of the employees.

v. Health and Safety

We provide a safe and healthy working environment for all our employees and we comply with all applicable laws and regulations related to occupational health and safety.

vi. Environment

We conduct our operations in an environmentally responsible manner and we comply with all applicable environmental laws and regulations.

vii. Privacy

We respect the privacy of our employees, customers and other stakeholders and we protect their personal information in accordance with applicable laws and regulations.

viii. Human Rights Due Diligence

We will conduct human rights due diligence to identify and address human rights risks associated with our operations and supply chains. We will take appropriate steps to prevent or mitigate adverse human rights impacts and we will provide remedy when necessary.

ix. Wage and Benefits

We ensure that our employees and business partners (associates) are paid fairly and reasonably and that our remuneration structure complies with the statutory obligations of the jurisdictions in which we operate.

x. Equal Training and Education Opportunities

We support and provide training and education programs to our employees, aimed at promoting long-term employability at a high level. One of our key principles is to focus on the personal development of employees, ensuring equal opportunities for all

xi. Communities

We are committed to respecting and preserving the culture and heritage of local communities, including socially vulnerable groups that may be impacted by our operations. We strive to develop constructive relationships with these groups.

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5.2.0 Implementation and Governance

This policy forms an integral part of Spark Minda Group's Sustainability Framework and is mandatory for all units/companies within the organization to implement. We are committed to upholding human rights and ensuring compliance with this policy.

The human rights policy is available to both internal and external stakeholders. We urge all stakeholders to come forward and report any concerns or violations related to the implementation or violation of this policy to:

Web-based Portal- <https://sparkminda.com/>

Contact Number- 8527177000

E-mail- wbp@mindacorporation.com

Mailing Address:

Head – Corporate Audit & Governance (CAG)
 Group Corporate Office
 D-6-11. Sector 59, Noida
 Uttar Pradesh-201301, India

Procedure of action to be taken on the compliant received:

- Complaint to be shared with Head CAG.
- Head CAG will investigate the complaint thoroughly.
- Upon completion of the investigation, the Head CAG will present a final report to the cross-functional committee.
- The Committee will review the report and provide recommendations and actions to be taken.
- Based on the Committee's decision, appropriate action will be taken by the GCHRO.

6.0.0 Special Provisions

Any deviation from policy shall be approved by GCHRO and GCEO.

7.0.0 Entirety

This Human Rights Policy SOP replaces all prior versions, policies and templates related to human rights, rendering them null and void.

8.0.0 Confidentiality Level

The document is the property of Spark Minda Group and is intended for sharing with all employees.

9.0.0 Training and Awareness

The HR team will assume responsibility for training and promoting awareness of this Policy

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List of Functional Committee Members

Name of Members	Designation
Pravesh Kumar	Head HR Business Vertical – 1
Jagat Dangi	Head HR Business Vertical -2
Sandeep Yadav	GM - Corporate HR
Ajay Singhroha	Group CHRO
Sanjiv Kumar Jalan	Head - Corporate Audit & Governance

Revision History

Rev No	Description	Date
R00	Original Document	01 Mar 2023

Approval

Responsibility	Name	Designation	Signature
Prepared by	Sandeep Yadav	GM - Corporate HR	
Reviewed by	Ambika Pratiyush	Head- Group Legal	
Reviewed by	Ajay Singhroha	Group CHRO	
Validated by	Sanjiv Kumar Jalan	Head - Corporate Audit & Governance	
Approved by	Ashok Minda	GCEO	