

HUMAN RIGHTS POLICY

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Approving Authority: Chief Human Resources Officer
(CHRO)

Version: 2



WE ARE A
**MODERNIZATION
ENGINEERING
COMPANY**

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1. Introduction

Sonata Software Limited ("SSL/ the Company/ we/ us") recognizes the significance of Human Rights as a universal value of humankind and see respect for Human Rights as a minimum standard for responsible business, both within and beyond our direct operations. Therefore, we are committed to respecting and supporting Human Rights in line with the nationally and internationally accepted principles viz:

- United Nations Guiding Principles on Business and Human Rights
- International Labour Organization Declaration on the Fundamental Principles and Rights at Work
- National Guidelines on Responsible Business Conduct
- SSL's Human Rights Policy ("Policy") is overseen by the CHRO.

2. Scope

This Policy applies to SSL and all its subsidiaries, joint ventures, and associate companies. All references to SSL shall be read to include references to all its subsidiaries, joint ventures, and associate companies. Our commitment to respecting Human Rights applies to all SSL employees including the Directors in the employment of the Company, contractors, vendors, or a person having an interest in any transaction with the Company (commonly referred to as 'Stakeholders').

3. Purpose

The purpose of this Policy is to formally document and outline the Company's commitments to respect Human Rights. The principles of Human Rights are integrated in management systems, in particular by way of assessing and managing Human Rights impacts of operations and ensuring all individuals impacted by the business have access to grievance mechanisms.

We apply a common set of principles to our business practices to ensure that we do not condone violations of Human Rights.

4. Human Rights Principle

The principles laid down below are based on their relevance to our business activities and relationships, with internal and external stakeholders.

4.1 Prohibition of Forced Labor

SSL prohibits forced or involuntary labor including bonded labour, slavery, and human trafficking.

4.2 Prohibition of Child Labor

Child labor is not to be used in any stage of manufacturing or for providing any kind of services. The term "child" refers to any person employed under the age of 14 (or 15 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations is supported. Workers under the age of 18 shall not perform hazardous

work and may be restricted from night work with consideration given to educational needs. We comply with all applicable labour laws and do not hire or engage with children or young adults below the legal working age.

4.3 Health, Safety & Well-being

The employees working with us have been extended the right to decent working conditions that respect their health, safety, well-being, maximum working hours, daily and weekly rest periods, and an annual period of paid leave. The Company strives to provide a safe, healthy, and hygienic environment to its workforce.

We provide an enabling work culture to our employees to foster their health and well-being and have programs and policies that include flexible working hours, work-from-home arrangements, part-time working options, childcare facilities, maternity leaves, etc.

4.4 Learning & Development

We value our workforce and ensure that we invest in their training & development for employees at all levels, for their upskilling and reskilling to address the skills gap and to enhance their capabilities.

4.5 Fair Remuneration

We are committed to fair remuneration, hours of work and social benefits which are based on local laws and regulations as well as prevailing market standards and practices.

4.6 Diversity & Inclusion

We promote principles of diversity, inclusion, and equal treatment and opportunity, and we are committed to guaranteeing a working environment where people are treated fairly and valued for their uniqueness. The Company ensures equal opportunities at the time of recruitment as well as during the course of employment including career development. We ensure that people will not be discriminated for their sex, race, age, colour, religion, origin, disabilities, marital status, sexual orientation, social condition, ethnicity, gender identification or expression, or any other status protected by applicable law. Our Equal Opportunity Policy details the measures taken to ensure diversity and inclusion across all levels.

4.7 Workplace Discrimination & Harassment

We undertake to maintain a work environment free of harassment, abuse, intimidation, or violence. The Company promotes a workplace that is free of disruptive conditions, harassment, violence and any unsafe or illegal practices. We value workplace diversity and condemn discrimination based on sex, race, age, colour, religion, origin, disabilities, marital status, sexual orientation, or social condition or any other discriminating reason. We are committed to creating systems and practices to ensure a discrimination & harassment-free workplace where employees feel safe and secure in discharging their responsibilities.

4.8 Right to Freedom of Expression

We encourage our employees' right to freedom of expression. We have formal and informal channels and forums for two-way communication and listening to employees' needs and aspirations. We have forums for employees to express themselves individually and collectively and we do not prevent the

association of employees while respecting the local laws and practices associated with it in the countries, which we operate in.

4.9 Protection of Data

We are committed to protect the data of the stakeholders and maintain adequate mechanisms as well as framework to ensure safety and security of personal data. This includes data encryption, security controls and tracking mechanisms. The Privacy Policy of SSL lays down details on the handling of personal information.

5. Human Rights in our Value Chain

We endeavor all our suppliers and business partners to respect Human Rights and to avoid complicity in Human Rights abuse. Our supplier code of conduct requires our suppliers to uphold labor rights and provide safe and health work environment to workers. We strive to manage the relationships with our suppliers and partners responsibly.

6. Risk Assessment and Control

We shall undertake Human Rights due diligence to identify the main risks of violation of Human Rights for the Company, depending on both the businesses and countries where the Company operates. In the due diligence processes, prior to entering into any new business relationship or any other type of agreement, we will assess the Human Rights policies and practices of its counterparties as part of our analysis process. Any identified breach of the respect for Human Rights will be analyzed based on internal procedures, legislation, and agreements in force, possibly resulting in disciplinary measures being taken.

7. Training & Awareness

SSL employees receive training on the Human Rights Policy through online training modules, posters at applicable work sites etc. New employees will receive Human Rights training as part of the onboarding process.

8. Responsibilities

Ensuring respect for Human Rights is the responsibility of everyone involved in our operations and value chain. Key roles and responsibilities for delivering our approach to Human Rights across our business are described below

- Policy formulation – Legal
- Policy implementation – Head -HRBP (Human Resource Business Partner), Head -Training, Head - Administration/Facilities, Business Heads
- Monitoring and reporting – Head HR Operations, Head – Internal Audit.

9. Update and Review

The Policy will be reviewed and updated every year, whenever new relevant trends in Human Rights are identified or whether any significant changes in the strategic aspects of the Company are made, by the HR team.

10. Policy Compliance

SSL follows a “zero tolerance” policy on Human Rights violations. Infringing on Human Rights or refusing to cooperate will result in disciplinary action up to the termination of the business relationship. Stakeholders are expected to be alert to any Human Rights violations and report them promptly.

11. Grievance Mechanism

Any Stakeholder believing that an actual or potential violation might have occurred shall promptly notify SSL regarding any such occurrence through its Vigil Mechanism Policy. The Vigil Mechanism Policy lays down the relevant process and procedure for reporting concerns. Reported concerns will be treated with confidentiality without fear of retaliation. The identity of the Stakeholder will remain confidential unless otherwise required by the law.

Please refer : https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Sonata_Vigil_Mechanism.pdf

12. Feedback

Your comments are important to us, and we welcome your feedback on our Human Rights Policy. Please contact us at CHRO@sonata-software.com

13. References

SSL embodies some of the above principles by incorporating it in related policies and processes across all its business operations. The relevant policies can be accessed at www.sonata-software.com. & Sonata One portal

- Vigil Mechanism Policy (https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Sonata_Vigil_Mechanism.pdf)
- Third Party Code of Conduct & Business Ethics (<https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Sonata-Third-Party-Code-of-Conduct-and-Business-Ethics-2016.pdf>)
- Code of Conduct for Directors and Senior Management Employees (<https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Code-of-Conduct-for-Directors-and-Senior-Management-Employee.pdf>)

- Policy and Rules on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace (https://www.sonata-software.com/sites/default/files/financial-reports/2022-01/posh-policy_0.pdf)
- Privacy Policy (<https://www.sonata-software.com/privacy-policy#:~:text=Sonata%20does%20not%20rent%2C%20sell,o%20r%20services%20you've%20requested>)
- Equal Opportunity Policy
- EHS Policy
- Sustainability Policy
- Code of Business Conduct and Ethics



**STAY
AHEAD**

THANK YOU

www.sonata-software.com

