

NEI Human Rights Policy (P5)

Effective Date: 1st April 2024

Rev: 3

Objective:

- Respect for human rights is fundamental to the sustainability of NEI and we are fully committed to upholding human rights standards across our entire value chain.
- NEI supports the well-being, dignity, and human rights of all our stakeholders in which the rights of every individual are respected and protected.

Scope:

- Employees working in the organization (on roll & third party), contract manpower, communities impacted by our operations, customers, suppliers, and vendors.
- This policy addresses a wide range of human rights issues, including forced labour, human trafficking, child labour, freedom of association, right to collective bargaining, equal remuneration, and non-discrimination, among others.
- The policy is aligned with the principles contained in the Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights and is consistent with NEI Code of Conduct.
- This policy provides the foundation for our human rights approach.

Respect for Human Rights:

- NEI is committed to identify, prevent, & mitigate adverse human rights impacts resulting from or caused by our business activities.

Community & Stakeholder Engagement:

- The Company recognizes its impact on the communities in which it operates. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

Valuing Diversity:

- The Company values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or

harassment on the basis of religion, race, caste, sex, place of birth, age, colour, disability, sexual orientation, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation, and advancement at the Company is qualification, performance, skills and experience. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.

- Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

Freedom of Association and Collective Bargaining:

- The Company respects our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Safe and Healthy Workplace:

- The Company provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury & exposure to health risks. We are committed to engaging with our stakeholders to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

Workplace Security:

- The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguard for employees and workers are provided as needed and will be maintained with respect for employee privacy and dignity.

Forced Labor and Human Trafficking:

- The Company prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking.

Child Labor:

- The Company prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits:

- The Company compensates employees competitively relative to the industry and local labor market. We operate in full compliance with applicable wage, work hours and overtime laws.

Diligence & Guidance for Employees:

- At NEI, we are committed to respecting, promoting, and safeguarding human rights. Our actions, policies, and frameworks echo this commitment as we continually strive to make a lasting, positive impact on the lives of our stakeholders.
- The Company creates workplaces in which open and honest communication among all employees are valued and respected. The Company is committed to following all applicable labor and employment laws wherever we operate.
- The company shall always work towards identifying and assessing the risks in all our operations, within the value chain, while establishing new business relationships or operations.
- The employee may address their complaints/grievances or report instances related to human rights violation to the Chief of Human Resources Officer. No reprisal or retaliatory action will be taken against any employee/ affiliate for raising concerns under this policy.
- The CHRO may form a committee to investigate and ensure suitable remedy is provided. If required, the committee may consultation. The nodal officer may form a committee to investigate the violations reported. The Committee shall evaluate the violations reported and ensure a suitable remedy is provided. It may also consult the senior management in provided the remedy, if required.