

## HUMAN RIGHTS AND LABOUR STANDARDS POLICY

*Tubestar is committed to ensure that the working environment is free from harassment, discrimination, bullying and workplace violence and ensures equal employment opportunity with human rights and labour standards complied.*

*This policy covers all Tubestar employees, contractors and representatives are required to follow in preventing and addressing harassment, discrimination, violence in the workplace ensuring Human Rights and Labour Standards are respected and maintained.*

*This policy applies to all employees, contractors and representatives across Tubestar facilities, including joint ventures, and to all activities that occur while on Company premises or while engaging in Company business activities or social events.*

*All employees, contractors and representatives are entitled to work in an environment free from discrimination, harassment and violence in which all individuals are treated with respect and dignity. As such, the Company will not tolerate any form of discrimination, harassment or violence. Any employee, contractor or representative whose behaviour constitutes discrimination, harassment or violence will be subject to disciplinary action, including, without limitation, termination for cause, and further legal action.*

The company is committed to protecting the human rights of everyone who works for the company and all those who have dealings with it. As a responsible company, we support the United Nations Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations”

We recognize that our responsibility for human rights and labour conditions encompasses:

- Operating sites - In developed countries, performance on most of the issues covered in this policy will be required by law. Therefore, this policy is primarily provided to guide operations in those emerging markets where concerns are regularly expressed about human rights.
- Supply chain - It is our aspiration that the working conditions throughout our supply chain meet internationally-accepted standards of human rights and working conditions

### **Responsibility**

We believe that everyone in the organization is responsible for having due regard for human rights. In particular:

- The Board of Directors has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed.
- Managers and supervisors provide visible leadership that promotes human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur.
- All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses.

### **Effecting action**

We recognize that from time to time we will encounter challenges on human rights that are bigger than the company is able to tackle alone. Many human rights abuses are systemic in their host communities. We are therefore committed to working with other organizations that can help us implement this policy effectively over time.

## **Policy principles**

The company requires that all its operating units seek to abide by the following:

### **Health and safety**

We will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our sites. Regular training to all our crew on health and safety issues will be provided. All workers will have access to bathroom facilities and potable water. Most aspects of health and safety are covered by existing Tubestar OHSE system. **All employees/personnel working for the company undergo Induction Programme on joining with includes compliance requirements to the company policies.**

### **Child labour**

The company shall not employ workers under the legal minimum age for admission to work stipulated by the laws of the countries where we work and will operate in accordance with ILO conventions No. 138 on the minimum age for admission to employment and No.182 on the banning of the worst forms of exploitation of child labour and can jeopardise health, safety or morals.

### **Forced labour**

**The company does not tolerate any form of forced labour including bonded labour, indentured labour and slave labour, or human trafficking. The employees must be allowed to move around freely and leave their place of work when their working hours end.**

#### **The company does not tolerate**

- **Modern Slavery, which is a serious crime that violates human rights; victims are forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self**
- **servitude, forced or compulsory labour and /or**
- **human trafficking within its workforce (or within own supply chain)**

In accordance with ILO Conventions 29 on Forced Labour and 105 on the Abolition of Forced Labour, we will not make any use of forced labour, including prison or debt-bondage labour. **The company shall not require the keeping of original documents (including documents for proof of identity like passport) / deposits of money in form of recruitment fees, either by our operating companies or agencies providing employees.**

**The company in case recognizes any such case of modern slavery/forced labour/human trafficking in their supply chain, the concerned suppliers/service providers are banned for doing any kind of business with the company and may follow legal routes as deemed necessary.**

### **Freedom of association and the right to collective bargaining**

**The company recognizes employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.**

We respect the principles of freedom of association and collective bargaining as defined in ILO convention No. 87 on the freedom of trade unions and the protection of trade union law and No. 98 on the right of organization and collective bargaining.

### **Non-Discrimination**

***The company does not tolerate any form of discrimination against our employees based on race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or other distinguishing characteristics.***

In accordance with ILO Convention 111 on Discrimination, we will not discriminate against any person based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age. We will not tolerate sexual or racial harassment or bullying.

***Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.***

***All employees (including contract workers, if applicable) are provided with understandable appointment/employment letters and the employment agreement terms contain the termination clause exercisable by the employees with reasonable notice periods in line with local regulations. The employment contracts details work location, working hours, all types of leaves and holidays including paid holidays and paid sick leaves, etc.***

### **Discipline**

The company shall not employ, or allow to be employed, any form of corporal punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through proper procedures.

### **Working hours**

Working hours in our businesses, including rest days and holidays are informed by various applicable statutory bodies and prevailing national laws ***and followed.***

### **Benefits and Compensation**

Wages paid for standard working hours must meet local legally-mandated minimum wage levels. However, they must also be sufficient to meet the basic needs of workers and their families. ***Wages for overtime must be paid in line with local regulations on a regular basis. Wage deductions as a disciplinary measure must not be permitted unless provided for by the local regulations. Employees must be entitled to at least one day off in seven, and must be given reasonable breaks while working and sufficient rest periods between shifts in compliance with work requirements and local regulations.***

***The company ensures that mandated social benefits are provided to all employees including contract workers as applicable as per local regulations.***

### **Living conditions**

In sites where dormitory accommodation is provided to the crew, the company ensures that this accommodation is of an acceptable standard of size and cleanliness; that it is appropriate to local customs and norms and that adequate facilities are provided.

### **Responsibility**

The Board of Directors is responsible to the comply and implement this policy through various process owners. The management is committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement.

  
Hardik Mehta  
Director

Date: 1<sup>st</sup> August 2022