

Human Rights Policy



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INTRODUCTION

True North believes in the philosophy of 'doing business the Right Way'. It has been our commitment to be responsible in our investments and this approach has helped us in building socially responsible businesses that are universally admired.



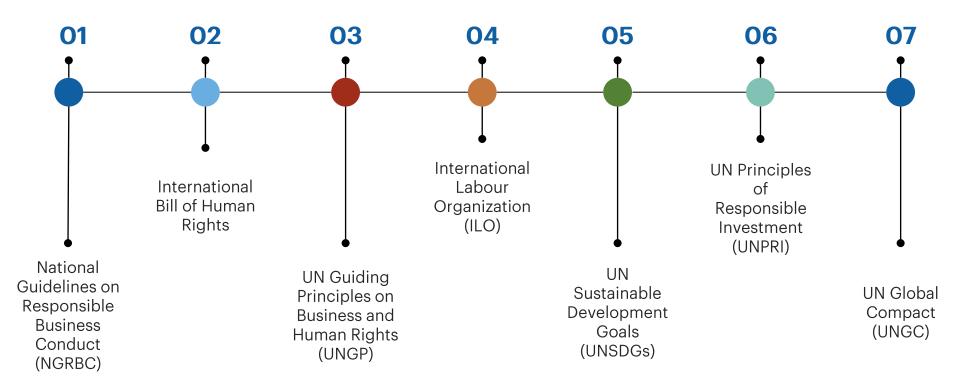


The Human Rights Policy applies to True North's own operations and its investing activities. The Policy applies to True North employees (full-time or part-time, permanent or temporary, at every level), Trustees and Directors of the Firm, and anyone who works on the Firm's behalf (including suppliers, contractors, advisors, consultants and other service providers).

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Our Human Rights Commitment and Policy are aligned with domestic and international standards and frameworks such as –





Our belief and deep commitment have always been to treat each person with respect, equity and inclusion. Among the crucial components of our investing philosophy intended to create socially responsible businesses, safeguarding, respecting and upholding human rights have always been a priority. Our Human Rights Policy, therefore, is a natural extension of the way that we conduct our business, operations and investing activities.

Human Rights Linked Policies

Our Policies including the True North Code of Conduct, Whistle Blower Policy, Human Resources Policy and POSH Policy strengthen the implementation of Human Rights commitments. Our People Handbook gives a good understanding of employee benefits and acts as a guide for an employee on the processes in place that safeguards rights of an employee.

Equal opportunity

We have always encouraged an inclusive environment, where we celebrate every employee's unique strength and support collaboration among one another. All our decisions shall be based upon individual merit and qualifications directly related to professional competence.

We strictly prohibit discrimination or harassment on the basis of religion, race, ethnicity, caste, colour, sexual orientation, gender expression or identity, age, medical condition, pregnancy status, marital status, mental or physical disability, or any other characteristics. Any form of offensive behaviour such as harassment, bullying, threatening or abusive behaviour, and violence through any means, verbal, physical or otherwise, that results in a hostile work environment, will not be tolerated.

Safe workplace

We place high importance on ensuring workplace safety for all. We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. We provide required safeguards to the employees, as and when needed. We also have a policy on prevention of sexual harassment to protect our employees and ensure a harassment-free workplace environment. We strive to continually provide safe working condition to our employees, and other members of our value chain.

Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as human trafficking, sexual exploitation, forced labour, forced criminality, domestic servitude, child exploitation and forced organ removal. We are committed to limiting the risk of modern slavery within our own business, our investments, supply chains or through any other business relationship.

Prohibition of Child/ Forced Labour

We do not use or condone, child or forced labour in any of our operations or premises and work to ensure these practices are not present in our workforce.

Diversity, Equity and Inclusion

We recognize the importance of diversity, equity and inclusion. At True North, we believe that people are our most important asset and are committed to embedding equity and inclusion in all practices including our investments. We aim to establish an inclusive culture based on our values and is free from discrimination of any form.

Knowledge Sharing and Capacity Building

We shall conduct periodic training activities to strengthen in-house awareness and knowledge on Human Rights considerations and ensure that all True North employees are aware of what constitutes as Human Rights violations, their rights, and the process of remediation. Human Rights aspects shall also form part of our ESG induction program for all new employees joining the Firm.

Freedom of Association and Collective Bargaining

We regard the rights of our employees to form or join labour unions (as permitted by local laws) in their personal capacities in a manner that does not create an actual or potential conflict with the interests of True North.

In our Investing Activities

Human rights considerations are included in our investment screening and due-diligence process for all our potential investments.

As part of our ESG value creation plan, we work closely with our partner companies to develop a Human Rights Policy that covers diversity, inclusion and equal opportunity, anti-discrimination and harassment, modern slavery, and child labour prevention. The policy should also state the compliance mechanisms and a Business Management Process to periodically review and discuss Human Rights performance at the Executive and/or Board Level.

Grievance redressal and Remediation

Open and transparent communication is primal in building a progressive working environment. Should there be any areas of concern, impropriety or wrong doings with reference to Human Rights and its salient elements, can be reported through available channels including our toll-free number as specified in our Whistle Blower Policy that is publicly available or by writing to grievance@truenorth.co.in. The Firm shall ensure that preventive actions to mitigate negative human rights outcomes and remedy actions are taken through necessary disciplinary/ legal action that deems fit.



Human Rights is an important pillar of our responsible investment approach. Therefore, it is integrated with our ESG and Climate Change governance mechanism that tracks our own and our Partner Companies' Human Rights performance. ESG and Climate Change Governance Committee shall be responsible for implementation, review and communication of Human Rights aspects in our own operations, investment decisions and with our Partner Companies.

We shall continue to strengthen our approach to address and remedy Human Rights issues in a manner that upholds human dignity. Our investing activities and stewardship shall continue to ensure that our partner companies' business and operations uphold Human Rights.

Thus, there shall be a constant endeavour by the firm to progress on upholding and implementing Human Rights standards and stand by our commitments.



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