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|  | <b>Pheon Auto Tech Pvt Ltd</b>   | Format Ref. | <b>F-MR-05</b> |
| Format Name                                                                       | Controlled Guidelines & Policies | Rev No/Dt   | 02/ 09.02.2022 |

| Sec. | Description | Particulars                                                                                                                                                                                                                                                                    |                          |                                     |            |                          |
|------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|------------|--------------------------|
| 1    | Particulars | Type of Guideline                                                                                                                                                                                                                                                              | Policy                   | <input checked="" type="checkbox"/> | Guidelines | <input type="checkbox"/> |
|      |             | Name                                                                                                                                                                                                                                                                           | Human Trafficking Policy |                                     |            |                          |
|      |             | Ref.                                                                                                                                                                                                                                                                           | G-H-11                   |                                     |            |                          |
|      |             | Department                                                                                                                                                                                                                                                                     | Human Resource           |                                     |            |                          |
| 2    | Purpose     | This policy aims to protect the rights and dignity of all workers, ensure that employment is always freely chosen, and provide clear procedures for reporting, investigating, and responding to suspected cases of human trafficking                                           |                          |                                     |            |                          |
| 3    | Scope       | This policy applies to all directors, officers, employees (permanent, temporary, contractual, and casual), consultants, contractors, subcontractors, suppliers, agents, stakeholder and any other third parties associated with Pheon Auto Tech Pvt. Ltd. operations in India. |                          |                                     |            |                          |
| 4    | Owner       | Manager HR & Admin                                                                                                                                                                                                                                                             |                          |                                     |            |                          |

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**By MR at 3:00 pm, Sep 01, 2025**

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| 5 | Guideline / Policy |
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### 1. Definitions

- **Human Trafficking:** Human trafficking means the recruitment, transportation, transfer, harbouring, or receipt of persons, by means such as threat, force, coercion, abduction, fraud, deception, abuse of power, or payment, for the purpose of exploitation, including forced labour and sexual exploitation.
- **Forced Labor:** Any work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. This includes debt bondage, deceptive recruiting, withholding of wages, restriction of movement, and retention of identity documents.
- **Child Labor:** The employment of children below the minimum age for employment as prescribed by Indian law (Ref.G-H-12).

### 2. Policy Principles & Commitments

- **Zero Tolerance:** The Company maintains a strict zero-tolerance approach to human trafficking, forced labor, and child labor.
- **Ethical Conduct:** We commit to conducting all business activities with integrity, transparency, and respect for human rights.
- **Compliance with Laws:** We will comply with all applicable national laws and regulations relating to human trafficking, forced labor, and child labor.
- **Risk Assessment:** We will regularly assess the risks of human trafficking within our own operations and supply chains.
- **Due Diligence:** We will implement robust due diligence processes to identify, prevent, and mitigate risks of human trafficking in our supply chain.
- **Training & Awareness:** We will provide training and raise awareness among our employees and business partners about human trafficking and this policy.
- **Reporting & Whistleblower Protection:** We will provide safe and accessible channels for reporting concerns related to human trafficking without fear of retaliation.
- **Remediation:** In the event of a violation, we will take appropriate remedial action, including supporting victims and cooperating with law enforcement.
- **Continuous Improvement:** We will continuously review and improve our efforts to combat human trafficking.

### 3. Implementation & Responsibilities

#### 3.1. Internal Operations:

##### a) Recruitment & Employment Practices:

- All employees will have written employment contracts in a language they understand, clearly stating terms and conditions of employment, wages and working hours.
- No employee will be required to pay any direct or indirect fees for obtaining employment.
- The Company will verify the age of all potential employees to ensure compliance with child labor laws.
- Identity documents (passports, Aadhaar cards, etc.) will not be withheld or confiscated. Employees will have free access to their personal documents at all times.

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- Wages will be paid directly to employees as per legal requirements, without unlawful deductions or delays.
- Employees will have the freedom to terminate their employment with reasonable notice as per their contract and applicable laws.
- The Company will ensure safe and healthy working conditions for all employees.

**b) Employee Awareness:**

- This policy will be communicated to all employees and prominently displayed in accessible locations within our facilities.
- Regular training sessions will be conducted for all employees, particularly those in Human Resources, Procurement, and management roles, on identifying and reporting potential signs of human trafficking or forced labor.

**3.2. Supply Chain & Business Partners:**

**a) Supplier Code of Conduct:**

- The Company will develop and enforce a Supplier Code of Conduct that explicitly prohibits human trafficking, forced labor, and child labor, and requires adherence to all applicable labor laws.
- All new and existing suppliers, contractors, and business partners will be required to acknowledge and commit to this Supplier Code of Conduct.

**b) Due Diligence & Risk Assessment:**

- We will conduct risk assessments of our supply chain to identify and prioritize suppliers operating in high-risk sectors or geographies for human trafficking.

**Due diligence will include:**

- Review of supplier policies and procedures related to labor.
- On-site audits of supplier facilities, including interviews with workers (with appropriate privacy and confidentiality measures).
- The Company reserves the right to conduct unannounced audits of supplier facilities.

**c) Contractual Clauses:**

All contracts with suppliers, contractors, and business partners will include clauses that:

- Explicitly prohibit human trafficking, forced labor, and child labor.
- Require compliance with this policy and all relevant laws.
- Grant the Company the right to audit and monitor compliance.
- Stipulate consequences for non-compliance, including immediate termination of the contract.

**d) Capacity Building:**

- Where appropriate, the Company will work with suppliers to build their capacity to identify and mitigate human trafficking risks.

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#### **4. Reporting Mechanisms & Investigations**

##### **a) Internal Reporting:**

- Employees are encouraged to report any concerns or suspicions of human trafficking, forced labor, or child labor directly to their supervisor, Human Resources department, or through a designated anonymous grievance mechanism (e.g., a confidential hotline or email).
- All reports will be treated with confidentiality and investigated promptly and thoroughly.
- The Company will protect whistleblowers from any form of retaliation for reporting concerns in good faith.

##### **b) External Reporting:**

- The Company will cooperate fully with law enforcement agencies and other relevant authorities in investigations related to human trafficking.

##### **c) Investigation Process:**

- A dedicated team (e.g., from HR, Legal, and Compliance) will be responsible for investigating all reported cases.
- Investigations will be impartial, fair, and conducted in a timely manner.
- Appropriate disciplinary action, up to and including termination of employment or business relationships, will be taken against individuals or entities found to be in violation of this policy.

#### **5. Remediation & Support for Victims**

- In the event that human trafficking, forced labor, or child labor is identified within our operations or supply chain, the Company will take immediate action to:
  - i. Ensure the safety and well-being of the victim(s).
  - ii. Provide or facilitate access to appropriate support services for victims, such as shelter, medical care, counseling, and legal aid, in collaboration with government agencies.
  - iii. Work to remediate the situation and prevent recurrence.
  - iv. Cooperate with law enforcement to bring perpetrators to justice.

#### **6. Review & Communication**

- This policy will be reviewed at least annually, or more frequently if there are significant changes in legislation, industry best practices, or the Company's operations.
- Any updates to the policy will be communicated to all relevant stakeholders.
- This policy will be publicly available on the Company's website and/or other accessible platforms.

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| Sec. | Description              | Details                   |                                                                                                                                                                     |                                                                 |                |
|------|--------------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|----------------|
|      |                          | Particulars               |                                                                                                                                                                     | From                                                            | Reference      |
| 6    | Inputs                   |                           |                                                                                                                                                                     |                                                                 |                |
| 7    | Outputs                  |                           |                                                                                                                                                                     |                                                                 |                |
| 8    | Monitoring & Measurement | Frequency                 |                                                                                                                                                                     | KPI                                                             | Responsibility |
|      |                          |                           |                                                                                                                                                                     |                                                                 |                |
| 9    | Revision History         | Rev No.                   | Details of Revision                                                                                                                                                 | Date                                                            | DCR No.        |
|      |                          | 00                        | INITIAL RELEASE                                                                                                                                                     | 01.09.2025                                                      |                |
|      |                          | 01                        |                                                                                                                                                                     |                                                                 |                |
| 10   | Format Usage Related     | Format Template Loc.      | Not Applicable                                                                                                                                                      |                                                                 |                |
|      |                          | Document Retention Format | Policies                                                                                                                                                            | To be Stamped and Signed by MD and then Retained in PDF Format. |                |
|      |                          |                           | Guidelines                                                                                                                                                          | Controlled Document to be retained in PDF Format                |                |
|      |                          | Document Retention Loc.   | PAT Systems Data > PAT - Document Resource > Controlled - PAT - Guidelines and Policies > Human Resource (H) Related > Controlled G-H-11 - Human Trafficking Policy |                                                                 |                |
|      |                          | Retention Period          | Perpetual Years                                                                                                                                                     |                                                                 |                |
|      |                          | Circulation               | MD, MIS, All Team Members.                                                                                                                                          |                                                                 |                |
| 11   | Abbreviations            |                           |                                                                                                                                                                     |                                                                 |                |
|      |                          |                           |                                                                                                                                                                     |                                                                 |                |
| 12   | Document Control         | Particulars               | Name                                                                                                                                                                | Date                                                            | Sign           |
|      |                          | Prepared By               | Devinder Singh                                                                                                                                                      | 01.09.2025                                                      |                |
|      |                          | Approved By               | Gaurav Singhal                                                                  | 01.09.2025                                                      |                |
|      |                          | Controlled By             | Mayank Mishra                                                                                                                                                       | 01.09.2025                                                      |                |

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