

# KFIN TECHNOLOGIES LIMITED (“KFINTECH”)

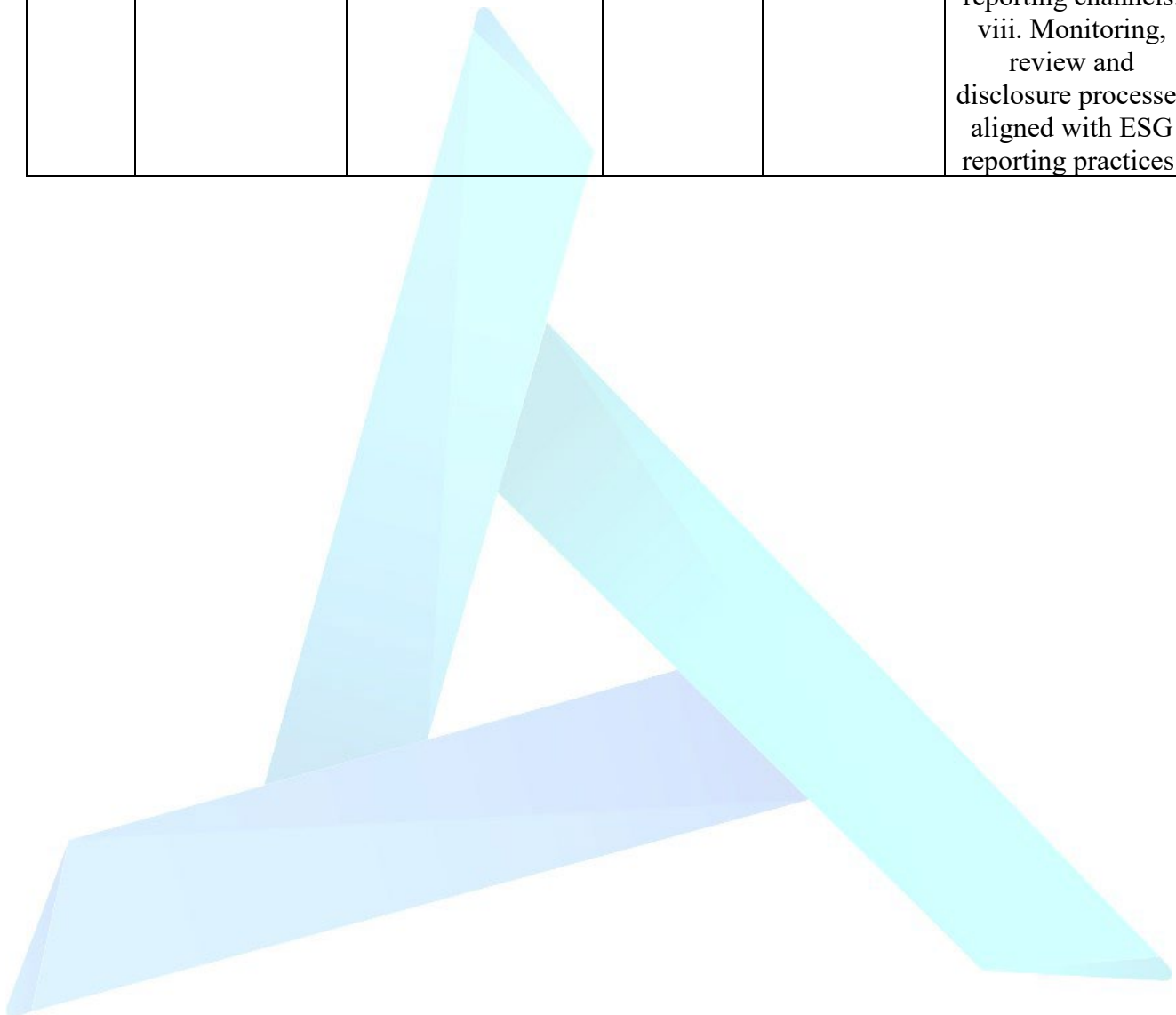
Document Name	Human Rights Policy
Document Number	KSFHR-003
Category	ESG

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## Document Revision History

Version	Date of Release / Revision	Prepared / Revised By	Reviewed & Approved By		Description of changes
			Name	Date	
1.0	April 1, 2022	Satpal Singh Talwar	Board of Directors	June 06, 2022	Initial version
2.0	May 1, 2023	HR Team	CPO	May 01, 2023	No changes
3.0	May 27, 2026	Snehal Garde, Compliance Team	Anish Kumar CCO	May 27, 2026	<p>Policy Changes:</p> <ul style="list-style-type: none"> <li>i. Policy structure streamlined and aligned with ESG governance framework.</li> <li>ii. Alignment with UN Guiding Principles, UDHR, ILO and NGRBC.</li> <li>iii. Clear scope and applicability defined across all employees and operations</li> <li>iv. Human rights approach formalized covering workplace practices and employee well-being</li> <li>v. Governance section strengthened with focus on non-discrimination, diversity and ethical conduct.</li> <li>vi. Key commitments expanded to include POSH, anti-corruption, data privacy and labour rights.</li> <li>vii. Grievance</li> </ul>

					redressal mechanism introduced through whistleblower and reporting channels. viii. Monitoring, review and disclosure processes aligned with ESG reporting practices.
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## 1. OBJECTIVE

KFin Technologies Limited including its subsidiaries, joint ventures and branches (collectively referred to as “Kfintech” or “Company” or “We”) considers the protection of human rights in its workplace as one of the most important duties and believes in the power of business in long term protection of human rights. We strive to promote and protect human rights in our workspace by abiding to the guiding principles set forth by the United Nations Guiding Principles on Business and Human Rights (**UN Guiding Principles**). We respect, integrate and uphold the human right guidelines put forth by Universal Declaration of Human Rights (**UDHR**) and the International Labour Organisation’s Declaration on Fundamental Principles and Rights to Work (**ILO Declaration**), National Guidelines on Responsible Business Conduct (NGRBC), 2019 in addition to complying with all applicable local and national laws and regulations. This commitment is reflected in the Company’s disclosures in its Annual Report, Business Responsibility and Sustainability Report (“BRSR”), and Environmental, Social and Governance (“ESG”) Factbook.

## 2. SCOPE AND APPLICABILITY

- 2.1 This Human Rights Policy (“Policy”) is applicable to all the directors, officers and employees (part-time and full-time) of the KFINTECH across all its operational locations within the reporting boundary used for the Company’s sustainability disclosures.
- 2.2 The Policy operates in conjunction with other internal policies and codes adopted by Kfintech and is effective from the date approved by the Board or the competent authority.

## 3. APPROACH

Kfintech’s approach to human rights is embedded in its governance structures, employment practices and internal policies. As a technology-enabled, service-oriented organisation, the Company’s human rights focus is primarily centred around workplace practices, employee well-being, ethical conduct, inclusion, and respect for dignity.

The Company endeavours to prevent adverse human rights impacts through fair employment practices, safe and healthy working conditions. Human rights considerations form part of Kfintech’s broader ESG governance and are reviewed periodically in line with its statutory disclosures and internal governance processes.

## 4. GOVERNANCE

- 4.1 **Equal opportunity and Non-Discrimination:** KFINTECH is an equal employment opportunity employer which provides a workplace free of harassment or discrimination based on age, race, culture, religion, caste, color, disability, origin, sexual orientation, gender identity, gender expression, genetic information or any other legally protected status.

This commitment supports Kfintech’s disclosures on diversity, inclusion and fair employment practices made under its BRSR and ESG reporting.

4.2 **Prevention of sexual harassment**: KFINTECH is committed to provide a safe, secure and congenial work environment for all the employees, and has zero-tolerance to any incident of sexual harassment in the workplace in any manner. The company's policy for Prevention of Sexual Harassment at Workplace aims to prevent any such incident and provides the procedure to be followed in case of any violation.

KFintech has established a formal **Prevention of Sexual Harassment (POSH) Policy** and related procedures to address complaints effectively and confidentially. In addition, the Company remains committed to maintaining safe, healthy and secure working conditions through regular engagement, consultation and internal practices, as reflected in its ESG disclosures.

4.3 **Workplace diversity and inclusion**: KFINTECH promote an inclusive workspace which leverages the power of diversity where everyone could contribute freely. We believe that inclusion of diversity as a key to growth and encourage mutual respect in the workspace.

The Company places emphasis on gender inclusion and has adopted policies aimed at supporting gender diversity, including provisions addressing the needs of transgender and gender-diverse employees, in line with its disclosed people practices.

4.4 **Abolition of forced labour and human trafficking**: KFINTECH is against any kind of forced labour, modern slavery, human trafficking and use of threat or violence as a measure to control.

4.5 **Safe, secured and healthy workplace**: We are committed to providing a safe, secured and healthy work atmosphere and lifestyle to all our employees and are focused on preventing any kind of adverse impact to the environment. We believe in regular consultation and involvement of our employees for making the workplace safe and healthy for everyone.

4.6 **Anti-bribery and Anti-corruption**: KFINTECH promotes ethical conduct and integrity in all its business activities. It does not tolerate bribery, corruption, money laundering or other unethical practices and addresses these risks through its policy on Anti-Bribery and Anti-Corruption. This policy provides the procedure to be followed in case of any unethical behavior or engagement in any corruption or bribery by any employee or third party.

4.7 **Data Privacy**: KFintech recognises the importance of privacy as a human right and is committed to protecting the personal data and confidentiality of its employees, clients and business partners. Information is collected, processed and shared only for legitimate purposes and in accordance with applicable data protection laws and internal policies.

4.8 **Human dignity and respect**: KFintech believe and is committed to treating all individuals with dignity, respect and professional courtesy. The Company does not tolerate any form of abuse of authority, harassment or discriminatory conduct in the workplace.

4.9 **Freedom of association and expression**: KFINTECH recognises and respects the rights of its employees and accept that they have the right to assemble peacefully and express their opinions related

to the employment within the premises of the office under the purview of the policies of the company and relevant laws.

- 4.10 **Anti-money laundering**: KFINTECH is committed to deterring fraud, money laundering and/ or terrorist financing. The company does not tolerate any kind of activities coming under the purview of money laundering under the prevalent laws or KFINTECH's Anti-Money Laundering Policy (AML Policy).
- 4.11 **Employee skill upgradation and career development**: KFINTECH believes in the upgradation of the skills and talents of its employees through various training programs which aims to enhance organizational capabilities through continuous improvements of the employee competencies, knowledge and attitude which is governed by our Training and Development Policy.

## 5. GRIEVANCE MECHANISM

We implement and promote the above-mentioned standards through various policies and guidelines. The company provides in-house training, discussions, and awareness to our employees in order to make sure that there is no human right violation taking place in the workspace. The company's Whistle-blower Policy is an important means to raise violations of the standards and prevent any suspected violations. It provides a confidential channel for reporting suspected violations of policies, unethical behaviour or human rights concerns.

Reported grievances are addressed in accordance with applicable policies and procedures, ensuring confidentiality, fairness and non-retaliation.

## 6. MONITORING, REVIEW AND DISCLOSURE

Implementation of this Policy is supported through internal communication, awareness initiatives and governance oversight. Human rights-related practices and matters are reviewed periodically as part of KFinTech's ESG and governance processes and are disclosed, as applicable, through statutory sustainability reporting including the BRSR and ESG Factbook.

KFinTech reserves the right to amend or update this Policy, as required, with approval from the competent authority