

HUMAN RIGHTS POLICY (V1.0)

**BEYOND COMPLIANCE, TOWARDS
HUMAN DIGNITY**

NE  STAR

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1. Policy Commitment

We respect internationally recognized human rights as defined by the **United Nations** and the **International Labour Organization**, and conduct our business in line with the **UN Guiding Principles on Business and Human Rights (UNGPs)**.

We recognize that respecting human rights requires more than formal legal compliance, particularly in contexts where structural socio-economic conditions can undermine dignity, health, and wellbeing even when laws are followed.

Our responsibility is to **avoid causing or contributing to human rights harm**, and to **seek to prevent or mitigate risks directly linked to our operations and business relationships**, consistent with the scope of our control and influence.

2. Operating Context

We operate in India, where industrial labor is shaped by structural challenges including low statutory wages, migrant labor, limited access to public healthcare, and economic pressure that can drive excessive working hours.

We acknowledge that **legal compliance alone may not fully protect human dignity in such contexts**. This policy therefore treats compliance as a mandatory baseline, supplemented by **risk-based due diligence and progressive mitigation**, consistent with UNGP expectations.

3. Scope of Application

This policy applies to:

- Direct employees.
- Contract and temporary workers engaged at our facilities.
- Business partners and suppliers, to the extent of our leverage and influence.

4. Our Staged Approach to Human Rights

Our approach to human rights is **progressive, risk-based, and context-aware**, consistent with the UN Guiding Principles on Business and Human Rights.

Stage 1 – Legal Compliance and Risk Recognition (Baseline)

Legal compliance forms the foundation of our approach and is mandatory. At the same time, we explicitly recognize that compliance alone may not eliminate human rights risks arising from structural conditions such as low minimum wages, migrant labor dependency, economic compulsion, or limited public services.

This stage emphasizes **honest recognition of risk**, not the assumption that legality equals adequacy.

Stage 2 – Risk-Based Due Diligence and Mitigation

We prioritize identified human rights risks and take reasonable, practical measures within our operational control to prevent or mitigate adverse impacts. This includes focused attention on:

- Working hours and fatigue.
- Economic pressure that may undermine free choice.
- Health, safety, and wellbeing.
- Treatment of vulnerable worker groups.

Our objective is to reduce foreseeable harm, not to replace public systems or assume responsibilities beyond our influence.

Stage 3 – Review, Learning, and Progressive Improvement

Human rights risks are not static. We commit to:

- Periodic review of identified risks.
- Learning from grievances, incidents, and worker feedback.
- Incremental improvement based on evidence and feasibility.
- Transparent acknowledgment of both progress and limitations.

This stage reflects continuous improvement rather than claims of completion.

5. Human Rights Risks We Prioritize

(UNGP Pillar II – Due Diligence)

5.1 Forced Labour and Coercion

We maintain zero tolerance for forced labor, bonded labor, or coercion, including retention of identity documents, restriction of movement, or debt-based employment.

5.2 Child Labour

We prohibit child labor and hazardous work involving minors and maintain age-verification processes consistent with applicable law and international standards.

5.3 Non-Discrimination and Dignity

We prohibit discrimination, harassment, or degrading treatment based on gender, caste, religion, ethnicity, nationality, disability, or any other protected characteristic.

Respect for dignity at work is non-negotiable.

5.4 Working Hours and Economic Pressure

We recognize that in low-wage contexts, requests for extended working hours may be driven by economic necessity rather than genuine choice. Our approach is to:

- Comply with legal limits on working hours and overtime.
- Avoid normalizing excessive or unsafe working hours.
- Ensure rest periods are meaningful and observed.
- Monitor fatigue and health risks associated with overtime.

5.5 Health, Safety, and Wellbeing

We commit to providing a safe and healthy workplace and to minimizing foreseeable risks to workers' physical and mental wellbeing.

Where public systems are inadequate, we seek reasonable measures within our operational control, without assuming responsibilities that properly belong to the state.

6. Grievance Mechanisms and Remedy

(UNGP Pillar III – Access to Remedy)

We provide workers with access to grievance mechanisms that are:

- Accessible and confidential.
- Free from retaliation.
- Fairly investigated.
- Capable of corrective action.

Where we identify that we have caused or contributed to adverse human rights impacts, we commit to remediation in line with UNGP expectations.

7. Supply Chain Expectations

We expect suppliers and contractors to respect fundamental human rights, particularly regarding forced labor, child labor, discrimination, and unsafe or degrading working conditions.

We apply a risk-based and progressive approach to supplier engagement, recognizing that leverage varies and that meaningful improvement requires engagement rather than symbolic certification.

8. Governance and Oversight

Human rights risks evolve as business operations and external conditions change. We commit to:

- Periodic human rights risk assessment.

- Focused attention on vulnerable worker groups.
- Evidence-based improvement over time.
- Transparent communication of intent, actions, and limitations.

9. Governance Statement

We reject the assumption that responsibility ends at legal compliance, just as we reject claims of perfection.

Our responsibility is to act where our decisions, operations, and influence intersect with human dignity.