

PRAGMETIS PHARMASERVE LLP.

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Subsidiary Company

PRAGMETIS PHARMACTIVES LLP.

Plot. No. 1115, Kerala GIDC, Tal. Bavla, Dist. Ahmedabad-382220, Gujarat, India.



HUMAN RIGHTS POLICY

April 01, 2025

HUMAN RIGHTS POLICY

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1.0 APPLICABLE

This Policy will start from 01st of April 2025.

2.0 SCOPE

Using the Human Rights Policy, PragMetis strives to create a productive work environment, conducive to safeguarding human rights. PragMetis also focuses on and expects all its employees, contractual staff, vendors, suppliers, business associates and other stakeholders to abide by this value system and policy as laid down hereunder.

3.0 RESPONSIBILITY

Top Management

4.0 POLICY

We respect and comply with all applicable laws and regulations in all territories of our operations, which also include the national labour regulations as applicable to human rights aspects.

4.1 Prohibition of Child Labour, forced labour and human Trafficking:

We are strictly against the employment of child labour or forced labour in any form whatsoever, paid or unpaid. We ensure that minimum working age requirements are met as per local regulations and prohibit the employment of child labour or forced labour across our value chain. Verification should be done on daily basis by security

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person at main entry gate during entry-exit practices. **Zero incidence of forced & Child labour.**

We are committed to not employing child labour in any area in which we operate. However, in any case of discovery of any child labour in our facilities, we are committed to follow following steps to support our commitment towards says no to child labour.

- We will immediately remove the child labour from our facility.
- We will contact his family and counsel them about the ill effect of the same.
- We will continue paying him the basic minimum wage until the legal working age.
- We will also make sure that the child labour complete the schooling.
- We will also all necessary support it terms of his education and other social aspects.
- We will also monitor his growth in terms of academics and provide necessary support to the same.

4.2 Inclusion:

We focus on promoting inclusion amongst the workforce by using a three pronged approach: or Equal Opportunities: We are committed to treating our employees and stakeholders with utmost dignity, respect, fairness and are an equal opportunity employer.

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4.3 Non-Discrimination:

We do not discriminate on the basis of gender, sexual orientation, race, religion, caste, ethnicity, age, nationality, disability, HIV status or family status amongst others.

4.4 Freedom of Association:

We uphold all legislation affecting employees in the country of our operation, ensuring the right to fair wages, freedom of association, participation and collective bargaining across the value chain. Our employees are free to join, form or refrain from any employee collectives without fear of retaliation, harassment or intimidation of any kind.

4.5 Work Life Balance:

We strive to provide a conducive work environment and effective benefits for employees to enable them to accomplish both their professional as well as personal development.

4.6 Workplace Security:

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. In case of any such unfortunate instances, we take appropriate action to address the matter.

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4.7 Data Privacy:

We respect the privacy of all our employees and business partners by taking measures that are prescribed by law to protect and secure personal data. We do not disclose anyone's personal, medical and financial information to any unrelated external party unless legally mandated.

4.8 Grievance Mechanism:

We provide ample open channels of communications and grievance redressed mechanisms to deal with stakeholder concerns on human rights in a just, fair and prompt manner. As per the expectations presented in the UN Guiding Principles on Business and Human Rights, we provide a grievance channel for our stakeholders which has been set up under our Whistle Blower Policy.

4.9 External Stakeholder Human Rights:

We strive to identify the adverse human rights impact of our business on all the relevant stakeholders, and correspondingly account for addressing these impacts through corrective actions. **100% employee should be cover in human right impact assessment.**

4.10 Human Rights Sensitivity:

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We embody sensitivity of Human Rights principles not just within PragMetis, but also across our value chain. Implementation of Policy We strive to ensure that our employees and all other PragMetis stakeholders strictly adhere to the above-mentioned policy. We also encourage our employees to raise concerns and/or ask for help in case of any unlawful or unethical behaviour or any possible violation of our policies, procedures or domestic laws as applicable or any other conduct which is inappropriate or unethical. In such cases, employees are encouraged to reach out to the senior management of PragMetis, The Top management Office is authorised to amend the policy to give effect to any changes/amendments as may be required from time to time.

4.11 Occupational, Health & Safety:

PragMetis is to take all reasonable steps to ensure the health and safety of our Employees, Visitors and Customers.

This is being achieved by:

- Assessing risks to health, safety and the environment associated with our workplace;
- Ensuring information, instruction, and training are timely and appropriate;
- Providing suitable facilities for our customers
- Periodically auditing and reviewing methods and procedures to ensure they are still valid;
- Re-appraising working practices when circumstances change or new hazards arise;

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- Identifying hazards through incident reporting in order to strengthen our precautions.
- Management's responsibility cannot be discharged without the co-operation of all employees and guests.
- With the implementation of the company policy on Safety and Health in all its offices the **Company tries to attain a zero accident** for the benefit of its customers and employees.
- Management gives full backing to the Safety and Health and supports all those who endeavour to carry it out in a quest to develop a positive health and safety culture.

4.12 Code of Conduct:

PragMetis is committed to a workplace that is inclusive and respectful to all employees, clients, stakeholders and athletes. To help us achieve this, this Policy details our Code of Conduct and expected behaviours.

4.13 Conduct:

All employees are expected to treat each other, and those they deal with, in the course of their work, with respect and in a professional manner. PragMetis does not tolerate any forms of harassment, discrimination or abuse including, but not limited to:

- Sexual or racial abuse or harassment;

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- Verbal or on-line abuse, or bullying or harassment;
- Gossip or the spreading of rumours that have the potential to compromise work place relationships;
- Undermining the reputation for integrity of colleagues or the PragMetis; and
- Any behaviour likely to breach the Human Rights.

4.14 Conflict of Interest:

During employment, must not undertake any activity or have any interest (e.g. memberships, directorships, shares, or contract) with any person or in any PragMetis which may constitute a conflict of interest with PragMetis Employee must notify manager immediately upon becoming aware of any potential or actual conflict of interest during employment. Subject to Employment Agreement any work undertaken with other PragMetis must have the prior approval of the Partner to ensure it does not interfere or create a conflict with main employment with PragMetis.

4.15 Confidentiality:

In the course of employment may have access to confidential information. Such information is strictly confidential and must not be used or divulged (directly or indirectly) by, either during or after employment with PragMetis A breach of confidentiality is a very serious matter and may be grounds for disciplinary action up to and including dismissal and/or legal action.

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4.16 Copyright and Protection of Intellectual Property:

Agree that are not entitled to any copyright or moral right in or arising from any work produce during employment with PragMetis This includes any program; strategy or system develop during employment with PragMetis Any copyright or merchandising rights in such work shall be the sole and exclusive property of PragMetis.

4.17 Dealing with Media/Giving Interviews:

PragMetis may engage local media to advertise events, achievements and to publicise business relationships – normally with the relevant manager’s prior approval. All other media contact must have the approval of the Partner prior to material being submitted to the media. Media includes (but is not limited to) print, television, Social Media and for on-line distribution. All media requests for interviews and/or comments must be firstly directed to the Partner and/or the designated media liaison person

4.18 Privacy Relating to the Treatment of Personal Information:

personnel records are kept securely by the position. Access to this information can be obtained through manager. must ensure that all personal information is protected against unauthorised use, access and disclosure.

4.19 Equal Employment Opportunity (EEO):

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PragMetis aims to be an equal opportunity employer and is committed to promoting equal opportunities regardless of religious belief, age, colour, race, creed, marital status, gender, sexual orientation, political affiliation, ethnic origin, family status or any disability may have subject to the exceptions contained in the Human Rights.

4.20 Harassment and Bullying:

Harassment and bullying in the workplace will not be tolerated. If any staff member feels they have been subjected to any form of harassment (sexual, racial, political, social, or religious) or bullying, it may be discussed (confidentially) with the Partner another appropriate senior employee. Complaints of harassment or bullying will be taken seriously, and instances of harassment or bullying may lead to dismissal or to other appropriate action being taken in respect of the person conducting such behaviour. Refer to the Employee Handbook for further information and for the harassment or bullying complaint policy and procedure.

4.21 Diversity and Inclusion:

This Policy aims to provide a foundation to support PragMetis commitment to achieving a diverse workforce and inclusive workplace practices to harness the PragMetis benefits of diversity, further social justice and comply with legislation.

1. By **diversity** we mean all the ways that we are both similar and different, including individual and PragMetis characteristics, values, beliefs, experiences, backgrounds, preferences, and behaviours. It involves variations in visible factors such as gender,

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age or ethnicity, and invisible diversity such as religion, sexual orientation, education, skills and ways of thinking.

2. By **inclusion** we are about achieving a work environment in which everyone is treated fairly and respectfully, has equal access to opportunities and resources, and can contribute fully to the PragMetis success.

Principles:

- We value diversity because it reflects and serves our nation and ensures our people thrive
- We're all accountable to create an inclusive culture
- We are committed to attracting diverse talent and hiring fairly
- We support flexible ways of working
- We're committed to equal pay for equal work
- We have an obligation to champion diversity and inclusion in the sport sector.

4.22 Bullying and harassment prevention:

PragMetis is committed to providing a work environment and culture free from discrimination, harassment, bullying and victimisation.

This Policy aims to establish clear expectations of behaviour and responsibilities, and procedures for dealing with complaints of discrimination, harassment and bullying.

This Policy applies to all employees, contractors, and temporary staff of PragMetis

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This Policy applies within the workplace as well as other work-related situations, for example, when employees are travelling on company-related business, attending work-related gatherings outside of the workplace, and dealing with customers, athletes and key stakeholders.

This Policy also applies to all tele communications, internet and social media activity:

- On behalf of the PragMetis;
- During work hours;
- Inside and outside of work hours, which references PragMetis, its services, employees, contractors, temporary staff, customers, athletes, key stakeholders or other PragMetis or individuals PragMetis has a relationship with;
- Inside and outside of work hours that could bring PragMetis into disrepute.

4.23 Harassment:

PragMetis does not tolerate behaviour which creates a hostile or distressing work environment, undermines morale, or reflects adversely on the integrity of PragMetis. Behaviour constituting harassment is often a matter of perception and interpretation, and tolerance for what is considered 'acceptable behaviour' may vary widely among individuals.

Harassment may occur as a single act, or as a series of incidents, persistent threats.

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Harassment can take many forms, it may be silent or loud, subtle or openly hostile, it can be private or public. It may take the form of general bullying, or be specifically aimed at people with particular or different characteristics.

Even if behaviour does not offend the person to whom it is directed, others overhearing or present whilst such behaviour is occurring may take offence and feel that they are being harassed

4.24 Recruitment and Induction:

PragMetis seeks to follow a robust and legally compliant recruitment process that ensures high quality appointments are made to all roles. Once appointed PragMetis seeks to offer a quality induction process that allows new starters to feel confident in their roles and to become effective contributors as soon as possible.

4.25 Recruitment:

Prior to undertaking any recruitment, the Partner must approve filling the vacancy. This approval must be in writing and include the remuneration payable for the role. All roles should have a current Job Description and this should be reviewed prior to any recruitment activity. All approved vacancies will be advertised internally and, where appropriate, externally. PragMetis is committed to complying with the Human Rights Act 1993 and to conducting recruitment processes that are fair to all applicants.

4.25.1 Merit-Based Processes

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We focus on merit-based recruitment & selection, training & development, compensation and promotion.

4.26 Working Condition:

Ensure decent working hours in compliance with all local laws applicable for working hours and overtime. Overtime shall not be excessive, do not be regular, and remain voluntary and always compensated, in compliance with applicable regulations & laws. Paid national and religious holidays for all employees. Additional days off during important events (marriage, birth, and death of relatives) are provided. Provide its employees with annual paid holidays. Ensure adapted working conditions whenever possible to encourage employees to have outside interests, especially community involvement. Implement gradually work-life balance initiatives among its own employees. Encourage employees to volunteer and contribute to Act. Community - an initiative of corporate volunteering and skills sponsorship- by providing four paid weeks for community engagement to all employees. **To achieve average working hour below 50 per week for each employee by end of the Dec. 2025.**

4.26.1 Physical & Mental Working Conditions

Protect the safety and health of all workers by preventing work-related injuries, ill health, diseases and incidents.

Comply with relevant Occupational Health & Safety (OH&S) national laws and regulations, applicable international norms ' including but not limited to ILO conventions on OHS ' voluntary programs, collective agreements on OHS and other

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requirements to which OCP Group subscribes. Ensure that workers and their representatives are consulted and encouraged to participate actively in all elements of the Safety Management system. Promote a workplace environment that supports and encourages the mental well-being of all employees

4.26.2 Induction:

Managers of new employees are responsible for the induction process.

4.27 Remuneration:

We have conducted remuneration is one of the mechanisms we use to attract, engage and retain people with the capabilities we need to achieve our strategy. Paying people fairly has a positive impact on their engagement and intention to stay.

The Partner will approve the remuneration of all employees within the job families listed in this policy, and make a recommendation to the Board for decisions that fall outside policy

The remuneration of all employees will be reviewed annually, having regard to the market movement, need to retain people, and the PragMetis ability to pay.

Any changes to individual's remuneration will be prioritised as follows:

- Comply with Minimum Wage Act requirements
- Reward high performer (in accordance with the Performance Appraisal Policy)
- Address any pay inequities.

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There will be no expectation or entitlement to any increase in remuneration and any change will be at PragMetis sole discretion.

All employees will be provided with a remuneration and benefits statement on commencing their employment

4.28 Use of company Vehicle:

PragMetis resources must be managed in a prudent and responsible manner to ensure both PragMetis financial sustainability and that we retain the trust and confidence of our funders, members and participants.

4.28.1 Vehicles

Certain roles will be assigned PragMetis owned or operated vehicles. Rules around the use of these vehicles are detailed in the Employee Handbook and employees must sign the acknowledgement form relating to these prior to using a company vehicle.

At times staff may be required to use their personal vehicle for company use and PragMetis will reimburse staff for occasional use at the Inland Revenue declared Mileage Rate.

PragMetis does not expect employees to drive for excessive amounts of time. Furthermore, the Government considers “drivers” should not work more than 13 hours without a 10-hour break.

As a guide, employees are not expected to work more than a 13-hour day including travel time, or when they are fatigued

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4.29 Remote Working (Work from home):

- Identifies the key guidelines for remote working arrangements;
- Identifies the process for applying for, considering and approving remote working arrangements;
- Sets out the criteria that managers should apply when considering remote working arrangements.

PragMetis is committed to providing flexibility around when, where and how we work in a way that is successful for individuals, teams and PragMetis strategic objectives.

In conjunction with the other flexible working opportunities that are available to employees, PragMetis recognises that circumstances may arise in which personal and/or business requirements are best met by remote working.

PragMetis may support a request for a remote working arrangement, where it is operationally feasible, cost effective and/or in the interests of PragMetis to do so.

4.30 Public Holidays:

Employees may not work on a public holiday unless required to by PragMetis Requests to transfer Public Holidays in accordance with the Holidays Act will be considered on a case by case basis and may be approved at PragMetis discretion.

4.31 Performance Appraisal:

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PragMetis is committed to providing all employees with clarity over the purpose and objectives of their role. To achieve this an annual cycle of Performance Appraisals will set objectives, measure them throughout the year, amend them as required, and provide feedback to employees on a regular basis.

Employees will have the opportunity to participate in planning their work and setting their goals in conjunction with their manager informally on a regular basis and formally during the Performance Appraisal cycle. Managers should provide employees with regular coaching and feedback.

The Performance Appraisal cycle is an opportunity for two-way communication and feedback about employees work and career with PragMetis.

4.31.1 Performance and Remuneration:

PragMetis believes in rewarding high performance. While we do not use a formal formula for calculating this as a general principle those staff who are assessed as 'high performers' though the Moderation process will receive higher percentage remuneration increases than other staff. Remuneration increases are not an entitlement and will be given at PragMetis discretion.

4.31.2 Self-Managed Career Planning

We encourage all employees to be self-managing in planning their short and long-term career and professional goals. Employees should feel free to discuss those goals and steps toward achieving them with their Manager – particularly at the start and midpoint of the Performance Appraisal cycle.

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4.32 Training and Development Policy:

PragMetis is committed to providing all employees with the tools required to undertake their roles to the best of their abilities and to supporting them in their career development. Training and development will play a key role in this and PragMetis approach to training and development is detailed in this policy.

PragMetis is committed to providing appropriate training and development opportunities to all employees in order to support high performance in their current role and to prepare them for potential future opportunities.

Training and development may be focussed on the specific technical requirements of an employee's role, more general 'business based' skills, or developmental needs.

Training needs may also be met via formal educational interventions with external providers.

Additionally, mandatory training will be part of PragMetis annual plan. This will include areas such as Health and Safety, Driver Safety, Legal Compliance and other areas identified by Management.

4.32.1 Planning training and development

Managers and employees should, as part of the annual Performance Appraisal cycle, discuss and identify training and development needs and possible solutions to those needs. Agreed training and development needs and solutions should be recorded as part of the Performance Appraisal cycle.

4.32.2 Higher Education

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Where a formal educational opportunity via an external educational provider is identified and approved the following may be offered at the discretion:

- A contribution toward courses fees;
- Time off for attendance at lectures or study groups and for exam preparation and attendance;
- Support toward the purchase of text books

4.33 Obligations and responsibilities:

PragMetis has a statutory obligation to provide a safe workplace, free from the stress that discrimination, harassment and bullying can cause.

4.33.1 Employee responsibility

Every PragMetis staff member has a responsibility to:

- Be aware of the terms of this Policy (as varied from time to time) and their rights and obligations under it;
- Comply with this Policy (as varied) at all times; and
- Maintain confidentiality concerning any complaint and/or investigation.

4.33.2 Management responsibility

Managers are expected to actively promote, implement and support this Policy. Failure by a manager to act reasonably to prevent or resolve incidents of discrimination, harassment, bullying and victimisation may lead to personal liability under health and safety legislation.

4.33.3 Vicarious liability

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Vicarious liability occurs when a person or company is held directly liable for someone else's actions, as if the person or company had actually engaged in the conduct. The law imposes vicarious liability in situations where a person or company is in a position to prevent conduct but does not do so.

4.33.4 Discrimination

PragMetis is committed to providing a workplace free of discrimination. Prejudices and stereotyped views must not influence the way we treat people, they only complicate our dealings in the workplace and prevent people from fully contributing. It is important to PragMetis that no employee or job applicant is discriminated against or denied equal treatment.

Unlawful discrimination occurs when a person is treated less favourably because they have, or are imputed to have, a particular characteristic or attribute which is protected by law.

Under law, Protected Characteristics include:

- Sex (which includes pregnancy and childbirth);
- Marital status;
- Religious or ethical belief;
- Race (including colour, ethnic or national origins);
- Disability;
- Age;
- Political opinion;
- Employment status;

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- Family status (including carer's responsibilities); and
- Sexual orientation

Discrimination can be both direct and indirect. Direct discrimination occurs when a person is treated differently because of a Protected Characteristic. Indirect discrimination can occur when a requirement, which is the same for everyone, has an unfair effect on some people because they possess a Protected Characteristic. Unlawful discrimination is a breach of this Policy and is strictly prohibited by PragMetis.

4.34 Misconduct and disciplinary matters:

Our employment and arrangements are designed to create a positive environment in which people can be successful in their job. Like any relationship, all parties need to communicate well to ensure clear understanding of their needs and expectations so that both parties can maintain and enhance the work environment and employment relationship.

All employment relationships will be maintained in a way that is consistent with the following principles:

- Supports the PragMetis purpose and ethos
- Supportive of individual and PragMetis accountability
- Supportive of individuals and their aspirations
- A prudent use of stakeholder funds

Prepared By:



Ms. Kavita Jain
(DGM-HR)
Date: 01/04/2025
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Approved By:



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(Managing Partner)
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It is the responsibility of both parties to maintain a positive relationship. Our Code of Conduct sets out the expectations we have for our employment relationship. Our Job Descriptions set out the Key Result Areas for each job and the values we will demonstrate in delivering the Key Result Areas.

Performance expectations are expressed in the performance agreement negotiated annually between the employee and their Manager during the Performance Appraisal cycle. We will use employment-related legislation and case law to guide us in resolving all employment relationship issues.

Procedures for dealing with issues of performance, misconduct or serious misconduct are detailed in the Employee Handbook and Employment Agreements. Employees will be supported by their manager and the PragMetis Employee Assistance Programme provider) through any such process).

4.34.1 Serious Misconduct

Serious Misconduct is conduct that seriously compromises PragMetis trust and confidence in the employee. Examples of serious misconduct may include, but are not limited to:

- a) Any material breach of the terms of the Employment Agreement, Employee Handbook, or any applicable policy
- b) Any dishonesty or theft
- c) Any situation where behave in a manner likely to bring, or PragMetis, into disrepute
- d) Falsification of PragMetis records

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- e) Wilful damage of PragMetis property
- f) Any situation where take unauthorised absence from work
- g) Any acts of violence, threatened violence or harassment against another person whilst in the course of duties for PragMetis
- h) Being drunk, or under the influence of, or using, illegal substances or drugs whilst on PragMetis business or on any work premises or property.
 - Wrongfully disclosing PragMetis information.
- i) The inappropriate use of electronic media, including pcs, internet and emails

4.35 Leaving the organization:

PragMetis intent is to maintain positive and constructive relationships with all employees – future, present and past. This policy details our mutual obligations when leave our employment. When leave PragMetis we ask that:

- Return all company property;
- hand over all current work to the appropriate people; and
- hand over to someone duly authorised all notes of confidential information which may have acquired during employment.

4.35.1 Exit Interview

When leave PragMetis may be invited to attend an exit interview in last week. This is a confidential and voluntary interview aimed at helping PragMetis to understand how to improve PragMetis performance.

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PragMetis

PRAGMETIS PHARMASERVE LLP.
PRAGMETIS PHARMACTIVES LLP.

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4.35.2 References

Generally, PragMetis does not provide employee references but it does provide a record of service, noting dates of employment and roles undertaken, signed by the Partner.

On occasion, employees may provide references with the prior written approval of their manager. Managers should use their discretion and if in doubt consult the Partner before providing authorisation

We are committed to comply with all applicable laws and regulatory requirements concerning our operations in the jurisdictions which the company operates.

This policy shall be reviewed periodically for its suitability and updated as necessary.

Next review on 31st March 2026.

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