

**Vedanta Resources Plc**

**Sustainability Governance  
System**


**Guidance Note GN12**

***Human Rights***

## Guidance Document – Human Rights

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## INTRODUCTION

### 1.1. Who is this Guidance Note aimed at?

This Guidance Note is aimed at all Vedanta subsidiaries, operations and managed sites, including new acquisitions, corporate offices and research facilities and to all new and existing employees and contractor employees. This Guidance Note is applicable to the entire operation lifecycle (including exploration and planning, evaluation, operation and closure).

### 1.2. What is the aim of this Guidance Note?

This Guidance Note supports the Vedanta Framework (in particular the Vedanta Policy POL02 on Human Rights). It provides guidance on the practices that can be adopted to uphold and respect the human rights of all our stakeholders including, but not limited to, our direct and indirect employees, contractors, suppliers and host communities in the countries in which we operate. Adoption of relevant aspects of this Guidance Note may help to inform effective processes and controls as part of the overarching business risk management framework.

### 1.3. What issues does this Guidance Note address?

This Guidance Note presents important contextual information, a management framework and tools for identifying, evaluating and managing potential human rights concerns associated with Vedanta's corporate and operational activities.

In addition, this Guidance Note describes the human rights landscape, key human rights considerations for Vedanta, and identifies the relevant aspects of the Vedanta Sustainability Governance Framework that incorporate human rights considerations including: land and resettlement, stakeholder engagement, community investment, security management, and grievance mechanisms.

This Guidance Note has been designed to provide a standard approach to assessing and managing human rights risks although it is noted that additional processes may also be appropriate for particular risk management topics associated with the sustainability agenda.

The focus of the Guidance Note is on the provision of preferred methods and outcomes rather than prescriptions whilst at the same time representing a practical “how to” guide for all Vedanta operators. It is intended that this Guidance Note presents standard baseline guidance for all Vedanta staff within all activities and operations. It does this whilst recognising the need for flexibility at the corporate, site and activity level which may depend upon specific circumstances and regulatory requirements.

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### 1.4. How should this Guidance Note be used?

This Guidance Note is not mandatory and is intended to reflect good practice and provide the basis for continual improvement of sustainability issues across the Vedanta business. However, where this Guidance Note is not used, operations will need to demonstrate (and document) how an equivalent risk assessment process is in place and how it achieves good practice.

The remaining sections of this guidance note are arranged as follows:

Section 2 Understanding Human Rights

Section 3 UN Human Rights Framework - Foundational Principles for Business

Section 4 UN Human Rights Framework - Operational Principles for Business

At the end of the Guidance Note there is information on Definitions and Related Documentation, as well as the following annexes:

Annex A: UN Global Compact Letter of Commitment

Annex B: Human Rights Due Diligence Assessment

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## UNDERSTANDING HUMAN RIGHTS

### 2.1. Historical Context

Human rights are described as rights inherent to all human beings, regardless of nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. All human beings are equally entitled to their human rights without discrimination. All human rights are universal and inalienable; indivisible; interdependent and interrelated.

Human rights are universal because everyone is born with and possesses the same rights, regardless of where they live, their gender or race, or their religious, cultural or ethnic background. They are inalienable because people's rights can never be taken away. They are indivisible, interdependent and interrelated because all rights are equal in importance and none can be fully enjoyed without the others. They apply to all people equally, and everyone has the right to participate in decisions that affect their lives.

The principle of universality was first emphasized in international law in the form of the Universal Declaration on Human Rights. The Declaration was drafted following the end of the Second World War on the basis of mutual international agreement that never again would such atrocities as those of the war be repeated. The Universal Declaration formally recognised 'the inherent dignity and equal and inalienable rights of all members of the human family as the foundation of freedom, justice and peace in the world'. As such it forms the foundation of international human rights law. It formalised the recognition and guarantee of the rights of every individual everywhere. Over 50 UN Member States participated in the final drafting and at the General Assembly meeting in Paris the Universal Declaration of Human Rights was adopted with eight nations abstaining from the vote but none dissenting. It was formally adopted by the United Nations General Assembly on 10th December 1948.

In January 1976 the International Covenant on Economic, Social and Cultural Rights came into force, followed by the International Covenant on Civil and Political Rights and its two Optional Protocols in March 1976. These supplement the original Universal Declaration. In combination, these are often referred to as the International Bill of Human Rights.

Summarised in the following tables are the human rights likely to be of most direct relevance to Vedanta's operations. In all cases the relevant sustainability considerations relate to labour and working conditions; terms of employment; occupational health, safety and welfare arrangements. They apply to direct workers, contracted workers and supply chain workers.

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**Table 1 - Some of the Universal Declaration of Human Rights relevant to Vedanta**

**The Universal Declaration of Human Rights provides for the protection of the right(s) to:**

Equality and non-discrimination (Article 2)

Life, liberty and security (Article 3)

Access to remedy (Article 8)

Peaceful assembly and association (Article 19)

Work, to equal pay for equal work, to rest and leisure (Articles 23-25)

Participate in the cultural life of the community (Article 27)

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**Table 2 - Some of the International Covenant on Economic, Social and Cultural Rights relevant to Vedanta**

**The International Covenant on Economic, Social and Cultural Rights recognize the rights to:**

Non-discrimination in economic, social and cultural rights (Article 2)

The equal right of men and women to the enjoyment of all economic, social and cultural rights (Article 3)

Work (Article 6)

The enjoyment of just and favourable conditions of work (Article 7)

Form and join trade unions (Article 8)

Adequate food (Article 11)

Water (Articles 11 and 12)

The highest attainable standard of health (Article 11)

Take part in cultural life (Article 15)

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**Table 3 - Some of the International Covenant on Civil and Political Rights relevant to Vedanta**

**The International Covenant on Civil and Political Rights provide for the protection of the following right(s):**

All peoples have the right of self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development (Article 1).

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Every human being has the inherent right to life (Article 6)

No one shall be held in slavery; slavery and the slave-trade in all their forms shall be prohibited (Article 8)

Everyone shall have the right to freedom of thought, conscience and religion (Article 18)

Freedom of opinion and expression (Article 19)

Peaceful assembly shall be recognized (Article 21)

Freedom of association with others, including the right to form and join trade unions for the protection of his interests (Article 22)

Of ethnic, religious and linguistic minorities (Article 27)

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Additional human rights that have been adopted in recent years and which are also relevant to Vedanta are included in below.

**Table 4 - Additional Human Rights relevant to Vedanta**

Legal Instrument	Reference
UN Declaration on the Right to Water and Sanitation (2010)	(A/RES/64/292)
UN Declaration on the Rights of Indigenous Peoples (2007)	(A/RES/61/295)
UN Convention on the Rights of the Child (1990)	(A/RES/44/25)
Convention on the Worst Forms of Child Labour (1999) - for the elimination of the worst forms of child labour	International Labour Organisation (ILO) Convention No. 182
Convention on the Minimum Age for Admission to Employment and Work - for the elimination of all child labour	International Labour Organisation (ILO) Convention No. 138
Convention on the Elimination of All Forms of Discrimination against Women	No. 20378

In addition to the human rights listed above there may be additional human rights that are also relevant and Vedanta should seek to ensure full coverage of each and every human right in its assessment.

Consideration should also be made of those aspects that may be of particular relevance to the mining sector including: artisanal and small scale mining; child rights and labour; conflict; employment; gender; indigenous peoples.

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### 2.2. Human Rights and Business

In the 1990s the issue of business and human rights became an item on the global policy agenda. This reflected the dramatic worldwide expansion of the private sector at the time, coupled with a corresponding rise in transnational economic activity. These developments heightened social awareness of business impacts on human rights and also attracted the attention of the United Nations. This contributed to the formation of the UN Global Compact and the UN Guiding Principles for Business.

### 2.3. UN Global Compact

The UN Global Compact evolved as a global voluntary initiative for corporate social responsibility. It aims to encourage the voluntary promotion of a series of key principles and their adoption by the corporate sector including the issue of business and human rights. Vedanta became a signatory of the UN Global Compact in March 2012. The letter of commitment is included in Annex 1.

The UN Global Compact consists of ten Principles relating to human rights, labour standards, the environment, and anti-corruption. The Principles are derived from the Universal Declaration of Human Rights; the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

The UN Global Compact does not cover an exhaustive set of human rights and this is not their intent. Reference may be made to the Global Compact as one of several sources of guidance that could assist in the design and implementation of corporate governance and management processes.

The Global Compact Principles are summarised in Table 5 and are mapped to the relevant parts of Vedanta's sustainability governance framework.

**Table 5 - Global Compact Principles and Corresponding Vedanta Management System Arrangements**

<b>Human Rights</b>		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights.	Human Rights policy
Principle 2	Business should make sure that they are not complicit in human rights abuses.	Human Rights policy
<b>Labour</b>		
Principle 3	Businesses should uphold the freedom of association and the effective recognition	Human Rights Policy Employee Consultation and Participation



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	of the right to collective bargaining.	Technical Standard
Principle 4	Businesses should uphold the elimination of all forms of forced and compulsory labour.	Human Rights Policy
Principle 5	Businesses should uphold the effective abolition of child labour.	Human Rights Policy
Principle 6	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Human Rights Policy
<b>Environment</b>		
Principle 7	Businesses should support a precautionary approach to environmental challenges.	HSE Policy
Principle 8	Businesses should undertake initiatives to promote greater environmental responsibility.	HSE Policy Environmental Management Technical Standard
Principle 9	Businesses should encourage the development and diffusion of environmentally friendly technologies.	HSE Policy Environmental Management Technical Standard
<b>Anti-Corruption</b>		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.	Code of Business Conduct & Ethics

### 2.4. UN Guiding Principles for Business

In June 2011, the UN Human Rights Council endorsed the Guiding Principles on Business and Human Rights to support the implementation of the 'Protect, Respect and Remedy' Framework proposed by Professor John Ruggie, UN Special Representative to the Secretary General.

The aim of the guiding principles (GPs) is to establish a common global platform for action on which cumulative progress can be built by elaborating the implications of existing standards and practices for States and businesses and integrating them within a single, logically coherent and comprehensive template.

The duty held of the State is to *protect* against human rights abuses by third parties, including business enterprises, through appropriate policies, regulation, and adjudication. The State duty to protect is described in GPs 1 to 10.

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The duty of the corporate organisation is to *respect* human rights, which means that business enterprises should act with due diligence to avoid infringing on the rights of others and to address adverse impacts with which they are involved. The GPs for business enterprises are classified as foundational principles and operational principles. The Foundational Principles for Business set the underlying philosophical requirements that businesses should incorporate into their corporate governance structure and are covered by GPs 11-15.

The UN Rights Council recognised the need for greater access by victims to effective judicial and non-judicial remedy for abuses of their human rights. GPs 25-31 describe the expectations for access to remedy.

### 2.5. Human Rights and Vedanta

In recognition of the International Bill of Human Rights and in accordance with the UN Global Compact and the UN Guiding Principles, Vedanta seeks to incorporate the corporate pillars of Respect and Remedy in relation to human rights to ensure fair and positive outcomes for all individuals.

Upholding and respecting people's fundamental rights is central to Vedanta's business operations and this is reflected in its Human Rights Policy (PS 02). Vedanta recognises that it has responsibilities to respect and uphold the human rights of direct and indirect employees, of host communities who may be directly or indirectly affected by corporate and operational activities and that such responsibilities encompass business relationships and the supply chain.

Vedanta's baseline position is to respect human rights, not to remedy for harm caused through failure to do so. Furthermore, the respect of one human right does not offset the failure to respect another. Likewise, having arrangements for the remediation of a human right that has been adversely impacted does not preclude the overarching obligation to respect it. However in recognising that there may be occasion when there is cause for complaint or dispute, Vedanta subsidiaries need to ensure that appropriate measures are in place as a means of redress.

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### UN HUMAN RIGHTS FRAMEWORK - FOUNDATIONAL PRINCIPLES FOR BUSINESS

The Foundational Principles for Business are summarised in Table 6 along with commentary which is taken from the Guiding Principles to provide context. Vedanta’s Code of Business Conduct and Ethics captures many of these foundation principles and in the various policies and standards that form the Sustainability Governance Framework and which are elaborated upon in Section 4 in relation to the Operational Principles.

**Table 6- Foundational Principles for Business**

<p>GP 11 - Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.</p>	
<p><u>Interpretation</u></p> <p>The responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate.</p>	<p><u>Vedanta’s Code of Business Conduct and Ethics</u></p> <p>Page 6, Human Rights</p>
<p>GP 12 - The responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.</p>	
<p><u>Interpretation</u></p> <p>Because business enterprises can have an impact on virtually the entire spectrum of internationally recognized human rights, their responsibility to respect applies to all such rights. In practice, some human rights may be at greater risk than others in particular industries or contexts, and therefore will be the focus of heightened attention. However, situations may change, so all human rights should be the subject of periodic review.</p>	<p><u>Vedanta’s Code of Business Conduct and Ethics</u></p> <p>Page 6, Human Rights</p> <p>Page 7, Health, Safety and Environment</p>
<p>GP 13 - The responsibility to respect human rights requires that business enterprises:</p> <p>(a) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur and,</p> <p>(b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.</p>	
<p><u>Interpretation</u></p> <p>Business enterprises may be involved with adverse human rights impacts either through their own activities or as a result of their business relationships with other parties. Guiding Principle 19</p>	<p><u>Vedanta’s Code of Business Conduct and Ethics</u></p> <p>Page 6, Human Rights</p> <p>Page 7, Health, Safety and Environment</p>

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<p>elaborates further on the implications for how business enterprises should address these situations.</p>	<p>Page 9, Competition and Fair Dealing</p>
<p>GP 14 - The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise’s adverse human rights impacts.</p>	
<p><u>Interpretation</u></p> <p>The means through which a business enterprise meets its responsibility to respect human rights may vary depending on whether, and the extent to which, it conducts business through a corporate group or individually. However, the responsibility to respect human rights applies fully and equally to all business enterprises.</p>	<p><u>Vedanta’s Code of Business Conduct and Ethics</u></p> <p>Page 6, Human Rights</p> <p>Page 7, Health, Safety and Environment</p> <p>Page 9, Corporate Opportunities</p> <p>Page 9, Competition and Fair Dealing</p> <p>Page 11, Conflicts of Interest</p>
<p>GP 15 - In order to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including (a) a policy commitment to meet their responsibility to respect human rights; (b) a human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights; (c) processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.</p>	
<p><u>Interpretation</u></p> <p>Business enterprises need to know and show that they respect human rights. They cannot do so unless they have certain policies and processes in place. Principles 16 to 24 elaborate further on these.</p>	<p><u>Vedanta’s Code of Business Conduct and Ethics</u></p> <p>Page 6, Human Rights</p> <p>Page 6, Compliance with Laws and Regulations</p> <p>Page 7, Health, Safety and Environment</p> <p>Page 8, Insider Trading</p> <p>Page 8, Whistleblowing</p> <p>Page 9, Corporate Opportunities</p> <p>Page 9, Competition and Fair Dealing</p> <p>Page 11, Conflicts of Interest</p>

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### UN HUMAN RIGHTS FRAMEWORK - OPERATIONAL PRINCIPLES FOR BUSINESS

This section outlines the operational Guiding Principles (GP 16 to GP 24) and the arrangements that Vedanta has in place to capture them.

#### 4.1. Policy and Governance

The following UN Guiding Principle establishes the corporate policy commitment to respect human rights.

GP16	Companies should make a policy commitment to respect human rights that: a) is approved at the most senior level, b) is informed by relevant expertise, c) states the human rights expectations of personnel, business partners and other parties directly linked to its operations, products or services, d) is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties; and e) is reflected in operational policies and procedures.
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Vedanta’s Human Rights Policy (POL02) sets out the key human rights concerns that must be considered in its activities and operations. These are the key concerns that have been identified as being at potential risk of adverse impact but this should not restrict the scope of a human rights risk assessment and management programme in order that the full range of human rights concerns are considered.

The effective governance and implementation of the Policy and its content requires institutional arrangements for effective oversight and control including formalisation of roles and responsibilities for persons designated with discharging Vedanta’s human rights obligations; internal and external stakeholder engagement and communication; human rights training for relevant staff including security personnel, and management procedures.

#### 4.2. Due Diligence

The aim of Human Rights Due Diligence is to identify and evaluate potential or actual human rights impacts that may be associated with a new project or operation in a new geographical territory; mergers and acquisitions; joint ventures; supply chain activities and business relationships, etc. Due diligence activities should be designed and conducted in accordance with GPs 17 and 18.

GP17	Companies should carry out human rights due diligence to identify, prevent, mitigate and account for how they address their adverse human rights impacts. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.
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GP18	Companies should identify and assess any actual or potential adverse human rights impacts with which they may be involved either through their own activities
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or as a result of their business relationships.

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The ability to assess accurately risks present in our operating environment is critical to the security of personnel, local communities and assets; the success of our short and long-term operations; and to the respect of human rights.

The due diligence assessment may require an extensive review of external factors to be conducted to enhance understanding of the political, economic and social context. This may require information to be obtained from different sources including: local and national governments, security firms, other companies, home governments, multilateral institutions, and civil society organisations knowledgeable about local conditions.

A review of external factors is particularly important where the geopolitical environment is changing and unpredictable and where this causes changes to military and social situations. The due diligence assessment will need to have access to up-to-date information and Vedanta subsidiaries will need to enhance this through maintenance of productive relations with local communities and government officials. The external factors review should typically consider as a minimum the following:

- *Identification of security risks* - arising from political, economic, civil or social factors and which may present a risk of adverse impact to the human rights of Vedanta's employees, contractors, the community and external stakeholders.
- *Potential for violence and conflict* - identification of and understanding the root causes and nature of local conflicts, as well as the level of adherence to human rights and international humanitarian law standards by key actors in the host country.
- *Human rights records* - review any available human rights records of public security forces, paramilitaries, local and national law enforcement, as well as the reputation of private security. Awareness of past abuses and allegations may help to avoid recurrences as well as to promote accountability.
- *Issues of context* - consider applicable local laws as well as international human rights provisions and seek ways to honour international principles when faced with conflicting requirements. Due diligence should consider the local prosecuting authority and judiciary's capacity to hold accountable those responsible for human rights abuses and for those responsible for violations of international humanitarian law in a manner that respects the rights of the accused. Consider also the political stability of the host government and also its reputation and respect for human rights and ability to enforce the rule of law; at both local and national levels.

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Human rights due diligence can be conducted as a standalone exercise for those situations where a focused rights perspective is required. In other cases, human rights considerations can be incorporated into an existing due diligence assessment process. The decision regarding the scope and extent of the assessment should be commensurate with the level of risk based on the size, nature and context of operations and the severity of the risks of adverse human rights impacts<sup>1</sup>. Where appropriate, due diligence should always be informed through direct engagement with those who may be affected or their legitimate representatives.

Whilst existing processes for impact assessment may consider human rights impacts, Vedanta subsidiaries should ensure that the full range of human rights is considered in the manner appropriate on a case by case basis. For this purpose reference should be made to Annex 2 which contains a tool to be used in due diligence assessments associated with mergers and acquisitions, joint ventures and other major projects which involve third party partnerships. This tool has been designed with the purpose of identifying potential human rights concerns that may present a risk to Vedanta and its corporate reputation. It provides the basis for a more detailed assessment to support a Stage 2 Technical Evaluation (as required by Management Standard (MS08) Acquisitions, Divestments and Joint Ventures Due Diligence). The desired standards set out in Annex 2 have been based on those described by the Global Compact: (<http://www.globalcompactselfassessment.org/>).

### 4.3. Human Rights Risk Management

The following are the UN Guiding Principles related to the corporate responsibility to respect human rights through the implementation of appropriate risk management arrangements.

GP19	Companies should integrate the findings from their impact assessments across relevant internal functions and processes and take appropriate action to prevent and mitigate adverse human rights impacts.
GP20	Companies should track the effectiveness of their response to verify whether adverse human rights impacts are being addressed, based on appropriate indicators and drawing on internal and external feedback, including from affected stakeholders.
GP21	Companies should be prepared to communicate how they address human rights impacts externally, particularly when concerns are raised by or on behalf of affected stakeholders. Where operations or contexts pose risks of severe human rights impacts, companies should report formally on how they address them.
GP23	Companies should always: a) comply with all applicable laws and respect internationally recognized human rights, b) seek ways to honour the principles of internationally recognized human rights when faced with conflicting requirements, and c) treat the risk of causing or contributing to gross human

<sup>1</sup> OECD Guidelines for Multinational Enterprises, 2011



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rights abuses as a legal compliance issue.

Vedanta’s Sustainability Governance Framework establishes the requirements and arrangements for the respect of human rights through its management and technical standards. The requirements of GP20 are addressed in the following Management Standards: *Auditing and Assurance* (MS12); *Corrective and Preventive Actions* (MS13), and *Management Review and Continual Improvement* (MS14). GP23 is addressed in *Compliance and Other Requirements* (MS04).

Relevant information concerning Vedanta’s human rights policy, human rights governance and management arrangements and related activities should be made publicly available in accordance with the GRI indicators.

Table 7 provides a summary of the Vedanta Technical Standards that cover specific aspects of human rights risk management.

**Table 7 - Vedanta's Human Rights Risk Management Arrangements**

<b>Vedanta Technical Standard</b>	<b>Aspects relevant to human rights management</b>
TS02: Employee Consultation and Participation	Workers’ representation Freedom of association Collective bargaining Communication and consultation Grievance mechanisms
TS03: Land and Resettlement Management	Access to remedy (compensation, rehabilitation, support to vulnerable groups) Grievance mechanisms Community engagement
TS04: Grievance Mechanisms	Mechanisms for employees and external stakeholders to raise a concern, complaint or feeling of resentment
TS05: Stakeholder Engagement	External engagement Arrangements for incident reporting and recording Communication
TS06: Supplier and Contractor Management	Contractor accommodation Grievance mechanism Child and forced labour Third party labour and working conditions
TS08: Conducting ESIA’s to International Standards	Human rights impact assessment Stakeholder engagement Grievance mechanism



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TS15: Security Management	General requirement to respect human rights of affected communities in the exercise of security activities Grievance mechanism
TS18: Water Management	Societal values and conflicting uses in the context of ecosystem services Affected communities' ownership and access rights to water resources

### 4.4. Access to Remedy

The following UN Guiding Principles describe the corporate provision for remediation of adverse impact to human rights.

GP22	Companies should provide for or cooperate in the remediation of impacts through legitimate processes, where they have caused or contributed to adverse impacts.
GP24	Where companies need to prioritise actions to address actual and potential adverse human rights impacts, they should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable.

The UN Guiding Principles on Business and Human Rights specify that businesses should have operational-level grievance mechanisms that are accessible directly to individuals and communities who may be adversely impacted by a business enterprise.

Vedanta's Technical Standard on Grievance Mechanisms (TS04) requires a grievance mechanism to be established to allow for opportunities to receive and facilitate the resolution of concerns and grievances from employees and to deal with complaints, disputes or grievances raised by external stakeholders. Vedanta also requires its operations to ensure appropriate resources are in place to provide the necessary support to sustain these grievance mechanisms.

If a complaint, concern or grievance is received it must be received, registered, documented and tracked to completion. Such mechanisms need not require that a complaint or grievance amount to an alleged human rights abuse before it can be raised, but specifically aim to identify any legitimate concerns of those who may be adversely impacted. If those concerns are not identified and addressed, they may over time escalate into more major disputes and human rights abuses.

If an adverse impact to human rights is identified to have occurred, or had the potential to occur, appropriate and early remedial action must be taken which should be commensurate with the level of harm or impact that occurred or had the potential to occur. Vedanta subsidiaries should escalate any such incidents in accordance with Incident Reporting, Classification and Investigation Management Standard MS11.

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If Vedanta subsidiaries have directly presented a risk of adverse impact, or have caused impact to occur, Vedanta should take action to prevent its occurrence or to mitigate the impacts and to prevent repeated impact. If it contributed to an adverse impact through its business associations, subsidiaries should take appropriate action to influence or direct the remediation (refer also to Section 8 in relation to leverage). Such incidents are to be reported as indicated above.

In prioritising action in the case of multiple actual or potential adverse human rights impacts, Vedanta reference should be made to Management Standard MS02 for Stakeholder Materiality and Risk Management to ensure that an appropriate risk-based course of action can be defined and acted upon.

### 4.5. Training

The following UN Guiding Principle describes the corporate provision for human rights training.

GP16	Companies should make a policy commitment to respect human rights that: a) is approved at the most senior level, b) is informed by relevant expertise, c) states the human rights expectations of personnel, business partners and other parties directly linked to its operations, products or services, d) is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties; and e) is reflected in operational policies and procedures.
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In accordance with the internal communication requirement of GP 16 (Policy Commitment), Vedanta subsidiaries are expected to ensure arrangements are in place for the provision of training for personnel in relevant business functions.

Vedanta subsidiaries should ensure that provisions are implemented for all employees to receive as a minimum basic human rights awareness training to raise general internal understanding as to why such issues are relevant to the Company. The Management Standard MS06 on Competency, Training and Awareness provides for general programme requirements for employee training and such training must include awareness of human rights based on job position and function.

For those members of staff that are directly responsible for respecting human rights, more advanced training will be required. This might include security, medical and human resources personnel as well as senior staff who have a 'controlling mind' with regard to Vedanta activities. Technical Standard TS 15 on Security Management provides for training, competency and awareness of security staff. It also requires that Vedanta will ensure that the safeguarding of personnel and property is carried out consistently with relevant human rights principles and in a manner that avoids or minimizes risks to the Affected Communities.

### 4.6. Supply Chain and External Relationships

The corporate responsibility to respect human rights applies across an organisation's activities and through its relationships with other parties, such as business partners, entities in its value chain,

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other non-state actors and state agents. Although all suppliers, including business partners, have the same responsibility to respect human rights as Vedanta and any other business entity, there is nonetheless the risk that such responsibilities are not upheld. For Vedanta, this may present potentially significant risks to the business through potential complicity in human rights abuses in its supply chain.

Vedanta subsidiaries should have arrangements in place to enable it to manage the risks of adverse human rights impacts in its supply chain. For example, this might include procurement and investment procedures that establish minimum requirements for conducting business only with those companies that have a proven track record in respecting human rights, as per Vedanta's Code of Conduct. Due diligence assessments, as described in Section 4.2 can be used to help identify, assess and respond to the risk of contributing to human rights abuses.

Where potential or actual human rights abuses are identified in the supply chain Vedanta subsidiaries may choose to eliminate the supplier from its supply chain, or to work with them to improve their code of conduct for human rights. The decision will be made on a case by case basis and will take into account the degree of influence and indirect control over such business partners, suppliers and customers and the voluntary or imposed requirement to uphold a policy or obligation for supporting and developing local content.

In the context of the globalised economy, and even with risk management controls in place, the risk of complicity in human rights abuses cannot be eliminated. If a situation of potential or actual complicity arises, the responsibility and/or accountability for the situation may not be clearly defined. The ICMM recommends that in all such situations, the organisation should benefit from independent legal advice.

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### RELATED DOCUMENTATION

A summary of the references and supporting documents relevant to this document is provided in the following table.

Doc. Ref.	Document name
CoC	Code of Business Conduct and Ethics
POL01	Social Policy
POL02	Human Rights Policy
POL04	Stakeholder Engagement Policy
POL06	HSE Policy
MS02	Stakeholder Materiality and Risk Management
MS08	Acquisitions, Divestments and Joint Ventures Due Diligence
MS10	Monitoring and Data Management
MS11	Incident Reporting, Classification and Investigation
MS2	Auditing and Assurance
MS13	Corrective and Preventive Actions
MS14	Management Review and Continual Improvement
TS02	Employee Consultation and Participation
TS03	Land and Resettlement Management
TS04	Grievance Mechanisms
TS05	Stakeholder Engagement
TS06	Supplier and Contractor Management
TS08	Conducting ESIA's to International Standards
TS10	Safety Management
TS12	Health Management
TS 15	Security Management
ICMM (International Council of Mining and Metals)	Human Rights in the Mining and Metals Industry - Overview, Management Approach and Issues, May 2009
ICMM (International Council of Mining and Metals)	Human rights in the mining and metals industry - Integrating human rights due diligence into corporate risk management processes, March 2012

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Doc. Ref.	Document name
OECD	Guidelines for Multinational Enterprises, 2011 edition

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### DEFINITIONS

Definitions of key terms used in this document are shown in the following table.

Term	Definition
Adverse human rights impact	Occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights or has the potential to do so.
Affected Party	Stakeholders who are affected by the company or operation, both positively and negatively. Within this it is possible to distinguish between those that are directly affected and indirectly affected by the company or operation.
Asset	An item or resource that can be owned or used to produce positive economic value
ESIA	Environmental and Social Impact Assessment – a formalised process designed to identify, assess and document environmental and social impacts associated with a project, along with the mitigation measures and management arrangements for ensuring such measures are implemented.
Environmental and Social Management System	The structured framework that provides the arrangements for managing the environmental and social aspects throughout the lifetime of the project.
Grievance	A concern, complaint or feeling of resentment raised by any stakeholder either affected or interested in company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations.
ICMM (International Council on Mining and Metals)	The International Council on Mining and Metals (ICMM) was established in 2001 and seeks to drive performance improvement through its members which comprise 20 mining and metals companies as well as 30 national and regional mining associations and global commodity associations.
IFC (International Finance Corporation)	Member of the World Bank that finances and provides advice to private sector ventures and projects in developing countries.
Impact Assessment	The stage in the ESIA development process in which the potential positive and negative impacts on the various environmental and social receptors identified during the baseline data collection phase are assessed to determine their significance.
International Standards	The environmental and social Performance Standards set out by the International Finance Corporation
Operation(s)	A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices and research and development facilities.

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Term	Definition
Protect	In relation to human rights refers to the State duty to protect the human rights of citizens.
Remediation	In relation to human rights remediation refers to the processes of providing remedy for a potential or actual adverse human rights impact. Source: ICMM 2012
Remedy	In relation to human rights remedy refers to the substantive outcomes that can counteract, or make good, the adverse human rights impact. These outcomes may take a range of forms, including apologies, restitution, rehabilitation, financial or non-financial compensation and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition. Source: ICMM 2012
Respect	In relation to human rights means not to infringe on the enjoyment of rights by others and addressing negative impacts with which they are involved. It is a corporate responsibility as distinct from the state duty to protect (ref. UN Guiding Principles).
Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and interested third parties.
Stakeholder Engagement	An umbrella term for the range of activities and interactions between Vedanta and stakeholders over the life of a project that is designated to promote transparent, accountable, positive, and mutually beneficial working relationships. Stakeholder engagement includes stakeholder identification and analysis, information disclosure, communication, problem/conflict anticipation and prevention, ongoing consultation, formation of partnerships, construction of grievance resolution mechanisms, negotiated problem solving, employee involvement in project monitoring, regular reporting forums and procedures, and other related management activities.
Vulnerable Groups	Individuals or groups within the project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's race, sex, language, religion, political, or other opinion, national or social origin, property, birth or other status. In addition other factors should be considered such as gender, ethnicity, culture, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.
Vedanta Company	A subsidiary of Vedanta Group either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.)

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### Annex A - UN Global Compact Letter of Commitment



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### Annex B Human Rights Due Diligence Assessment

This annex has been prepared for use in due diligence assessments associated with mergers and acquisitions, joint ventures and other major projects involving third party partnerships for the purpose of identifying potential human rights concerns that may present a risk to Vedanta and its corporate reputation. It provides the basis for a more detailed assessment to support a Stage 2 Technical Evaluation (as required by Management Standard (MS08) Acquisitions, Divestments and Joint Ventures Due Diligence) of human rights concerns (see MS08 - Annex A - Sustainability Screening Checklist). The desired standards set out in the following sections have been based on those described by the Global Compact (<http://www.globalcompactselfassessment.org/>) and have been organised by subject matter.

This annex should not be treated as an exhaustive list of potential issues for concern, and should not comprise the only aspect of the assessment. It may be necessary to conduct reviews of documentation (private and publicly available), interviews with company personnel and others (insofar as this is appropriate and feasible) and to appoint specialist legal counsel.

#### Working Conditions

Relevant Vedanta References:

- Human Rights Policy (POL02)
- Stakeholder Engagement Policy (POL04)
- HSE Policy (POL06)
- Acquisitions, Divestments and Joint Ventures Due Diligence (MS08)
- Monitoring and Data Management (MS10)
- Auditing and Assurance (MS12)
- Corrective and Preventive Actions (MS13)
- Management Review and Continual Improvement (MS14)
- Supplier and Contractor Management (TS06)
- Safety Management (TS10)
- Health Management (TS12)

Desired Standards	Yes/No/NA
<i>Health &amp; Safety Management</i>	
There are formal and effective management arrangements, policies, procedures and other systems in place to manage health and safety.	
Employees and managers receive appropriate health and safety information, instruction and training and this is delivered in a language and format that they understand.	
Responsibilities for health and safety tasks are clearly defined, documented, communicated and understood.	
Approaches adopted to identify, select and manage contractors in order to ensure that health and safety arrangements and performance are appropriate and effective.	
Reliable information is readily available concerning the health and safety performance of (i) the company and (ii) the main contractors, and this includes evidence of risk management (such as training delivered to employees, auditing and inspections) and work-related accidents, incidents and ill-health.	
The company routinely monitors its production processes, machinery and equipment to	

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ensure that they are safe and in good working order.	
Arrangements are in place for the control of physical, chemical and biological hazards and these are based on the following hierarchy of control: elimination; reduction at source; adaptation; substitution; collective and personal protection, and administrative controls including training.	
There have been no health or safety regulatory warnings or prosecutions within the last three years, including those still pending, and no compensation claims for health or safety reasons with the last three years (and none outstanding).	
<i>Welfare, medical and first aid</i>	
The workplace is maintained to ensure clean and comfortable conditions including a suitable temperature, ventilation and lighting; suitable washing and sanitation areas appropriate for both genders.	
Residential or overnight facilities are safe and sanitary and meet the basic needs of workers including with regard to safety, space, temperature, lighting, ventilation, food, water, sanitary facilities, privacy, and affordability.	
The company provides safe drinking water for all employees and facilities for clean and sanitary food storage and eating.	
Provision of first aid cover and emergency medical facilities (for remote sites) and implementation of any necessary health surveillance and monitoring programmes is acceptable.	
Where relevant the company has put in place special health and safety precautions for pregnant women, employees with disabilities, night workers, young workers and other vulnerable groups.	
<i>Accidents and Incidents</i>	
Health and safety incidents are recorded, reported and investigated including fulfilment of any statutory reporting obligations.	
Fire fighting equipment and systems are available and maintained and there are emergency response plans and procedures for fire, explosion, spillages and other emergency scenarios.	
Data is available regarding accident, incident and near miss recording and reporting (for employees, contractors, visitors and other third parties).	
Comprehensive employer's liability/workers' compensation insurance, details of compensation data or outstanding compensation claims for worker injuries and diseases.	
On the basis of the information provided it can be concluded that the desired standards are in place for the management of human rights associated with working conditions and there is no evidence of any issues which may impact Vedanta's reputation should Vedanta proceed with a merger, acquisition or joint venture.	

### Labour Conditions

Relevant Vedanta References:

- Human Rights Policy (POL02)
- Stakeholder Engagement (POL04)
- HSE Policy (POL06)

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Desired Standards	Yes/No/NA
<ul style="list-style-type: none"> <li>• Acquisitions, Divestments and Joint Ventures Due Diligence (MS08)</li> <li>• Management Review and Continual Improvement (MS14)</li> <li>• Employee Consultation and Participation (TS02)</li> <li>• Grievance Mechanisms (TS04)</li> </ul>	
<i>Payment and Wages</i>	
It is company policy to provide employees with a living wage <sup>2</sup> sufficient to meet basic food, clothing and housing needs and provide some discretionary income for themselves and their dependents.	
The company pays wages at regular intervals and does not take deductions from wages for disciplinary measures or other deductions not authorised by national law.	
Bonus and piece-rate payment systems are monitored to ensure that the total salary paid meets living wage requirements without resort to overtime.	
The company operates an effective and verifiable system to plan, record and monitor hours worked by each employee, to record the payment of wages, overtime pay and bonuses, and to evaluate resource availability to ensure the number of employees is sufficient to meet production targets without resorting to overtime.	
<i>Working hours</i>	
There are formal management arrangements, policies, procedures and other systems in place to plan, manage and record the hours worked by each employee. Limits on number of hours worked per week and as overtime have been adopted.	
Employees are allowed at least 24 consecutive hours of rest (or more if provided by national law or industry standards) in every seven day period.	
During working hours employees are entitled to regular rest breaks and are able to use welfare facilities as necessary including outside designated breaks.	
<i>Absence</i>	
All employees to are entitled to paid holiday and paid sick leave (which is not deducted from employees' holiday allowance) and these arrangements are in accordance with national law or as otherwise agreed (for example with workers' unions / workers' representatives).	
Arrangements are implemented for all female employees to take maternity leave and for all employees who have recently adopted a child or children, or have taken on the responsibility to care for foster children to take compassionate/parental leave.	
<i>Fair Treatment and Non-Discrimination</i>	
The company has a commitment to prevent workplace harassment, and actively informs employees of their obligations to refrain from violent, threatening or abusive conduct.	
Managers receive training on how to identify and deal with instances of harassment in the workplace.	

<sup>2</sup> A living wage is distinct from a minimum wage. A living wage is one that enables an individual to realise the human right to a “standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control” (Universal Declaration of Human Rights, 1948, Article 25(1)). The minimum wage often falls short of that required for realisation of this right.

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The company investigates all complaints of workplace harassment and takes appropriate preventative and disciplinary action including reporting of criminal actions to the appropriate authorities.	
There are arrangements in place to ensure that the privacy of employees is respected whenever it gathers private information or monitors the workplace?	
Decisions concerning hiring, wages, promotion, training, discipline, retirement and termination are based only on unbiased criteria, and are not linked to factors such as race, gender or age; religion; marital status, etc.	
All employees who are involved in recruitment receive training regarding the company's non-discrimination arrangements (policy, procedures, etc).	
Arrangements are made as appropriate to enable people with disabilities or health conditions to pursue employment opportunities with the company, for example allowing wheel chair access, flexible working hours, longer breaks etc.	
<i>Freedom of Association and Collective Bargaining</i>	
The company has a formal commitment to recognise the rights of its workers to freedom of association and collective bargaining, including the right to freely form and/or join independent trade unions, and this commitment is clearly communicated to all employees.	
The company allows employees to engage in regular employee-only meetings within normal working hours, where employees can discuss concerns regarding working conditions.	
<i>Forced and Child Labour</i>	
The company takes all necessary measures to ensure that it does not participate in any form of forced or bonded labour and this includes an assessment of employment agencies that it uses to ensure they uphold the same standards.	
All employees receive employment contracts prior to starting work for the company, and measures are taken to ensure the contract is understood by the employee.	
Overtime work is paid, voluntary and not compelled through threat of pay deductions, termination or other sanctions.	
All workers are allowed to leave company premises during breaks and at the end of their shifts, and workers living in accommodation provided by the company may freely enter and exit at any time.	
Notice periods are of reasonable length and clearly communicated to workers prior to starting employment.	
The company complies with minimum age standards for the country in which it operates.	
If the company employs young persons (below the age of 18 years) a risk assessment is undertaken and the necessary controls are put in place to protect them from harm and all relevant information concerning their health, safety and welfare is provided to their parent or guardian.	
<i>Grievance Mechanism</i>	
Employees (including temporary or third party employees) are able to lodge grievances confidentially and without fear of retribution by management or other employees.	
There is a mechanism in place for hearing, processing, and settling grievances of employees.	
Employees are clearly informed, in a language understandable to them, on how to use the	

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procedure; what grievances can be reported; and how grievances are processed and resolved.	
Reliable information is readily available concerning grievances and this includes the date and nature of the grievance, the status of the grievance (i.e. outstanding, in-progress, closed) and a description of the taken to address the grievance.	
On the basis of the information provided it can be concluded that the desired standards are in place for the management of human rights associated with labour conditions and there is no evidence of any issues which may impact Vedanta's reputation should Vedanta proceed with a merger, acquisition or joint venture.	

### Community Impacts

#### Relevant Vedanta References:

- Social Policy (POL01)
- Human Rights Policy (POL02)
- Stakeholder Engagement (POL04)
- Stakeholder Materiality and Risk Management (MS02)
- Acquisitions, Divestments and Joint Ventures Due Diligence (MS08)
- Cultural Heritage (TS01)
- Land and Resettlement Management (TS03)
- Grievance Mechanisms (TS04)
- Stakeholder Engagement (TS05)
- Biodiversity Management (TS07)
- Conducting ESIA to International Standards (TS08)

Desired Standards	Yes/No/NA
<i>Impact Assessment</i>	
During options appraisal, an assessment is made of the potential environmental and social impacts of the project, and this includes an assessment of the potential human rights consequences for local inhabitants or other affected communities including in particular those of indigenous peoples.	
The company has a method for identifying the individuals who are likely to be affected by such impacts and engages in consultation with those individuals throughout the lifecycle of the project from select through construction and operations to decommissioning.	
The company shares the findings of its social and environmental impact assessment studies with the affected individuals in a form and language accessible to them.	
In consultation with the affected individuals, the company develops appropriate management plans to prevent, reduce, mitigate and manage adverse social and environmental impacts.	
There are arrangements for the continuous monitoring of the social and environmental impacts and affected individuals are provided with regular access to updated information about the social and environmental impacts of its operations.	
There is a grievance mechanism available and accessible for all affected individuals where they can safely file complaints and concerns regarding social and environmental impacts of company operations and have their concerns addressed in an impartial and responsive manner.	

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Reliable information is readily available concerning grievances and this includes the date and nature of the grievance, the status of the grievance (i.e. outstanding, in-progress, closed) and a description of the taken to address the grievance.	
<i>Land and Property</i>	
Prior to buying, renting, acquiring or otherwise accessing land or property, whether directly or through a third party, the company identifies all existing owners and users or the land or property including users of common lands and open access lands.	
The company investigates the past usage and ownership of the land or property to ensure that past users and owners have not been wrongfully removed, and that any expropriations by the authorities have been conducted in accordance with international law.	
7654e3wq The company consults with affected users and owners of the land or property (including women, tenants, settlers, indigenous peoples, other minorities and other vulnerable groups) and seeks their free and informed consent before continuing to acquire or access the land or property.	
The company ensures that affected owners and users of the land or property are adequately compensated, at or above market replacement rates, for the land or property, including for damages to land, damages to assets, and loss of income.	
On the basis of the information provided it can be concluded that the desired standards are in place, and there is no evidence of issues associated with community impacts that could affect Vedanta's reputation should Vedanta proceed with a merger, acquisition or joint venture.	

### Country Risk

#### Relevant Vedanta References:

- Social Policy (POL01)
- Human Rights Policy (POL02)
- HSE Policy (POL03)
- New Projects, Planning Processes and Site Closure (MS03)
- Acquisitions, Divestments and Joint Ventures Due Diligence (MS08)
- Conducting ESIA to International Standards (TS08)

Desired Standards	Yes/No/NA
During options appraisal, an assessment is made of the general human rights situation of the country as part of the decision-making process for new projects and other major projects (including mergers and acquisitions and joint ventures).	
The assessment specifically considers the presence of indigenous peoples in the host country and the particular measures that may be required to protect them.	
Arrangements are in place to actively seek regular information about the general human rights situation in the host country.	
If systematic human rights abuses exist there are processes in place to ensure awareness of and avoid the risk of contributing to, endorsing or benefiting from such abuses.	
Where there are risks of involvement in systematic human rights abuses owing to government or societal practices, there are arrangements in place to identify solutions through dialogue with other businesses, civil society organisations, experts and other relevant stakeholders, including where possible with the authorities.	

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Partnerships, social investments, donations or other activities are aligned to the human rights and development needs in the host country.	
On the basis of the available information it can be concluded that there is no evidence of human rights abuses in the host country of the target company which may impact Vedanta's reputation should Vedanta proceed with a merger, acquisition or joint venture.	

### Suppliers and External Relationships

Relevant Vedanta References:

- Social Policy (POL01)
- Human Rights Policy (POL02)
- Supplier and Contractor Management Policy (POL05)
- Stakeholder Materiality and Risk Management (MS02)
- Acquisitions, Divestments and Joint Ventures Due Diligence (MS08)
- Employee Consultation and Participation (TS02)
- Conducting ESIA to International Standards (TS08)

Desired Standards	Yes/No/NA
The company has a commitment to promote the continuous improvement of human rights standards of its suppliers.	
The commitment is supported by training on human rights standards for relevant management and procurement staff.	
The company has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of human rights abuses.	
The company has defined minimum requirements for the human rights standards of suppliers and communicates these in writing to new and existing suppliers and business partners.	
Where necessary, the company collaborates with individual suppliers to implement continuous improvements of human rights standards.	
The company's procurement practices, such as prices, delivery times and internal incentive structures, encourage improved human rights standards in suppliers and business partners.	
The company collaborates with other companies to promote improved human rights standards in suppliers.	
On the basis of the information provided it can be concluded that the desired standards are in place, and there is no evidence of issues associated with the company's suppliers and external relationships which may impact Vedanta's reputation should Vedanta proceed with a merger, acquisition or joint venture.	

### Security Personnel

Relevant Vedanta References:

- Social Policy (POL01)
- Human Rights Policy (POL02)
- Supplier and Contractor Management Policy (POL05)



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<ul style="list-style-type: none"> <li>• Acquisitions, Divestments and Joint Ventures Due Diligence (MS08)</li> <li>• Management Review and Continual Improvement (MS14)</li> <li>• Security Management (TS15)</li> </ul>	
Desired Standards	Yes/No/NA
<p>Security risk assessments are regularly conducted and they include an assessment of the risk of human rights abuses by private and public security personnel in the country or area of operation.</p>	
<p>Security arrangements, including the deployment of private guards or public security personnel, are proportionate to the security risk.</p>	
<p>Private security firms are selected on the basis of information about professional ability, level of staff training, quality of equipment, past involvement in human rights abuses, links with political factions or organisations and other relevant criteria.</p>	
<p>Contracts with private security firms include requirements related to international human rights standards for law enforcement and use of force; require the investigation and discipline of any unlawful or abusive conduct by security guards; and allow for termination of the contract in case of such conduct.</p>	
<p>The duties of security personnel are documented and a copy is given to every individual as part of their training on their duties, the rules of conduct for law enforcement and the use of force.</p>	
<p>Where public security personnel are assigned to company facilities, the company seeks to ensure transparency concerning its interactions with public security agencies, and the company communicates to the relevant public security agencies its desire that security functions be conducted in accordance with international human rights standards for law enforcement and the use of force.</p>	
<p>A procedure is implemented for recording security-related incidents, including a mechanism for handling complaints from staff or local communities related to the conduct of security personnel, and forwards credible allegations of human rights abuses to the relevant authorities.</p>	
<p>A procedure is implemented for monitoring and evaluating the security arrangements, including and representatives from the local community are consulted as part of the monitoring.</p>	
<p>The monitoring and evaluation of security arrangements includes consideration of the following criteria:</p> <ul style="list-style-type: none"> <li>• the proportionality of the security arrangement;</li> <li>• impact on local communities;</li> <li>• impact on existing local tensions or conflicts;</li> <li>• security incidents recorded; and</li> <li>• credible allegations of human rights abuses by company security personnel.</li> </ul>	
<p>On the basis of the information provided it can be concluded that the desired standards are in place, and there is no evidence of issues associated with the company's security arrangements which may impact Vedanta's reputation should Vedanta proceed with a merger, acquisition or joint venture.</p>	



