"National Institute of Research and Designs for the Blind" Limited

ANTI - SLAVERY AND GENDER EQUITY POLICY

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1. Introduction

1.1 Whereas, National Institute of Research and Designs for the Blind, LLC will adhere to the high international standards and business behavior codes.

- 1.2 Whereas, National Institute of Research and Designs for the Blind, LLC is internationally recognized commercial organization.
- 1.3 Whereas, National Institute of Research and Designs for the Blind, LLC intends to use the best HR standards and is interested in well-trained, loyal and effective team of employees.
- 1.4 Words and expressions which are defined in the Policy (to the extent applicable) shall have the meanings attributed to them therein when used in this Policy unless otherwise defined or the context otherwise requires.
- 1.5 The clause and paragraph headings and the table of contents used in this Policy are inserted for ease of reference only and shall not affect construction.
- 1.6 Except where the context specifically requires otherwise, words importing one gender shall be treated as importing any gender, words importing individuals shall be treated as importing corporations and vice versa, words importing the singular shall be treated as importing the plural and vice versa, and words importing the whole shall be treated as including a reference to any part thereof.
- 1.7 References to statutory provisions, enactments or Russian laws and BRICS standards shall include references to any amendment, modification, extension, consolidation, replacement or re-enactment of any such provision, enactment or Russian laws and BRICS standards (whether before or after the date of this Policy), to any previous enactment which has been replaced or amended and to any regulation, instrument or order or other subordinate legislation made under such provision, enactment or Russian laws and BRICS standards unless any such change imposes any liabilities or obligations which are more onerous than as at the date of this Policy.
- 1.8 If any provision of this Policy is held to be invalid or unenforceable by any judicial or other competent authority, all other provisions of this Policy will remain in full force and effect and will not in any way be impaired.
- 1.9 If any provision of this Policy is held to be invalid or unenforceable but would be valid or enforceable if some part of the provision were deleted, the provision in question will apply with the minimum modifications necessary to make it valid and enforceable.
- 1.10 This Policy may be executed in any number of counterparts, each of which shall constitute an original, and all the counterparts shall together constitute one

and the same Policy.

2. What does our policy cover?

- 2.1 This ANTI SLAVERY AND GENDER EQUITY POLICY exists to set out the responsibilities of National Institute of Research and Designs for the Blind, LLC and those who work for us in regards to observing and upholding our zero-tolerance position on slavery and illegal child labor. The policy also sets faire gender equity standards and sets religious freedom standards.
- 2.2 It also exists to act as a source of information and guidance for those working for National Institute of Research and Designs for the Blind, LLC. It helps them recognize and deal with slavery and gender issues, as well as understand their responsibilities.
- 2.3. Child labor refers to children who are engaged in an economic activity and who are below the minimum legal age of employment in a given country. Depending on the country, young people aged 12-15 and over may be employed in certain "light work" if it is not hazardous or harmful to their health and does not affect their attendance and performance at school.
- 2.4. Slavery refers to all practices similar to slavery. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 2.5. Gender equity is the process of being fair to women and men. Gender equity recognizes that within all communities, women and men have different benefits, access to power, resources and responsibilities with certain limits based on religious beliefs and national traditions and customs. To ensure fairness, strategies must often be available to compensate for women's historical and social disadvantages that prevent women and men from operating on an equal playing field. Gender equity leads to gender equality, where there are equal rights, responsibilities and opportunities for women and men.
- 2.6. Freedom of religion or belief is guaranteed by National Institute of Research and Designs for the Blind, LLC. Freedom of religion and belief has many dimensions and it intersects with other human rights including the right to freedom of thought and conscience. Freedom of belief means that every person has a right to worship God in his own way.

3. Policy statement

3.1 National Institute of Research and Designs for the Blind, LLC is committed to conducting business in an ethical and honest manner, and are committed to implementing and enforcing systems that ensure slavery, including illegal child, labor is prevented. National Institute of Research and Designs for the Blind, LLC has zero-tolerance gender discrimination activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

- 3.2 National Institute of Research and Designs for the Blind, LLC will constantly uphold all laws relating to anti slavery and gender equity policy in all the jurisdictions in which we operate.
- 3.3 National Institute of Research and Designs for the Blind, LLC recognizes that slavery (including child labor) is punishable by imprisonment and a fine. If a project company is discovered to have taken part in such illegal activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing slavery in our business, and take our legal responsibilities seriously.
- 3.4 National Institute of Research and Designs for the Blind, LLC recognizes that any type of **harassment** (e.g. bulling, nicknames, gossips) is a form of employment discrimination that violates the Law. Sexual harassment involves conduct of a sexual nature that is unwelcome or considered offensive, particularly in the workplace.
- 3.5 National Institute of Research and Designs for the Blind, LLC will immediately inform authorized law enforcement bodies about all the cases which come to its knowledge whereby this Policy is violated.
- 3.6. National Institute of Research and Designs for the Blind, LLC respects personal freedom and human rights.

4. Who is covered by the policy?

4.1 This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located.

- 4.2 In the context of this policy, third-party refers to any individual or organization our project meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies this includes their advisors, representatives and officials, politicians, and public parties.
- 4.3 Any arrangements National Institute of Research and Designs for the Blind, LLC makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with basic, internationally recognized standards and procedures relating to anti slavery and gender equity.

5. Employee Responsibilities

5.1 As an employee of National Institute of Research and Designs for the Blind, LLC, you must ensure that you read, understand, and comply with the information contained within this policy.

- 5.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of slavery and gender discrimination. They are required to avoid any activities that could lead to, or imply, a breach of this policy.
- 5.3 If you have reason to believe or suspect that an instance of slavery or gender discrimination, or religious discrimination has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.
- 5.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. National Institute of Research and Designs for the Blind, LLC has the right to terminate a contractual relationship with employees if they breach this policy.
- 5.5 National Institute of Research and Designs for the Blind, LLC reserves the right to prescribe formal or casual dress-codes and (or) uniform for the employees. In any case the dress-code and (or) uniform shall be reasonable and suitable to the employees. Sexual and irrelevant to the duties of the employees dressing is prohibited. Dress code prescribed by religion to the believer is more important than the formal dress code for the employees.

6. What happens if I need to raise a concern?

- 6.1 This section of the policy covers 3 areas:
- a. How to raise a concern.
- **b.** What to do if you are a victim of slavery or gender discrimination.
- c. Protection.

6.2. How to raise a concern.

If you suspect that there is an instance of slavery or gender discrimination activities occurring in relation to National Institute of Research and Designs for the Blind, LLC, you are encouraged to raise your concerns at as early as possible. If you're uncertain about whether a certain action or behavior can be considered slavery or gender discrimination, you should speak to your line manager, the compliance manager, the director, or the Head of Governance and Legal.

- 6.3. National Institute of Research and Designs for the Blind, LLC will familiarize all employees with its whistleblowing procedures so employees can vocalize their concerns swiftly and confidentially.
- 6.4. If you're treated badly because you complain about discrimination or you help someone who has been discriminated against, this is called **victimisation**. Victimisation is an unlawful act.

7. Training and communication

7.1 National Institute of Research and Designs for the Blind, LLC will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

- 7.2 National Institute of Research and Designs for the Blind, LLC's anti slavery and gender equity policy will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.
- 7.3 National Institute of Research and Designs for the Blind, LLC will provide relevant anti slavery and gender equity training to employees etc.
- 7.4 National Institute of Research and Designs for the Blind, LLC cooperates with trade unions and associations of employees with a clear intention to meet realistic and legal expectations of the employees.

8. Record keeping

8.1 National Institute of Research and Designs for the Blind, LLC will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence.

8.2 National Institute of Research and Designs for the Blind, LLC keeps records related to settled slavery and gender legal issues and claims for the minimum period of 5 years.

9. Monitoring and reviewing

9.1 National Institute of Research and Designs for the Blind, LLC's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. The manager will assess its suitability, adequacy, and effectiveness.

- 9.2 Internal control systems and procedures designed to prevent slavery and gender discrimination are subject to regular audits to ensure that they are effective in practice.
- 9.3 Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.
- 9.4 This policy does not form part of an employee's contract of employment and National Institute of Research and Designs for the Blind, LLC may amend it at any time so to improve its effectiveness.