

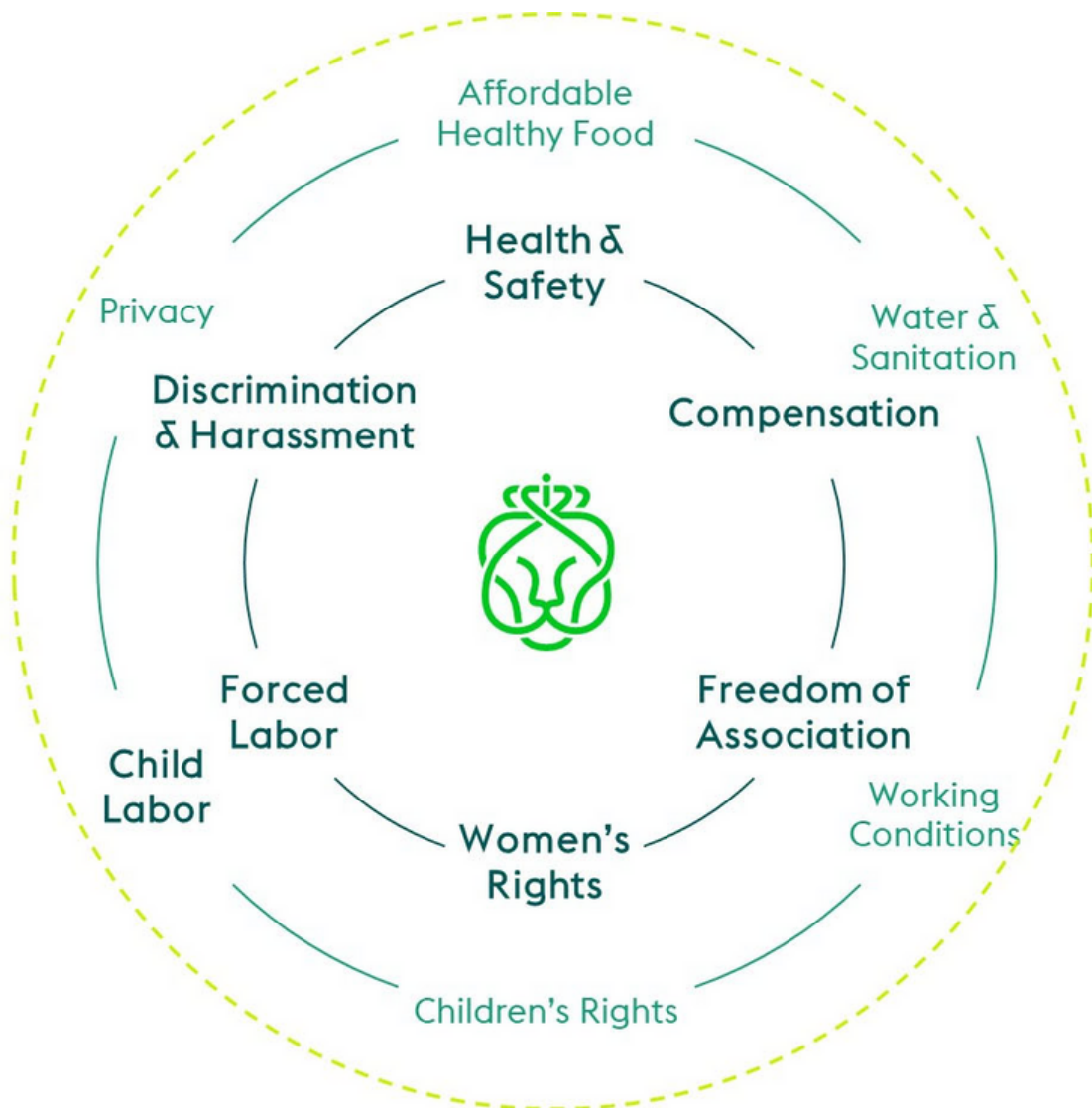


HUMAN RIGHTS POLICY

INTRODUCTION

Our human rights commitment refers to all internationally recognised human rights. We strictly prohibit the use of any form of forced labour or the trafficking in persons across all our operations and in our value chain. Our human rights commitment refers to the human rights of any persons who can be adversely impacted by STAR's activities and business relationships, including employees, people who work in our value chains, community members and other individuals. We will pay particular attention to the rights of, as well as the challenges.

At STAR, we are driven by our commitment to safety, respect of our associates, compliance with all applicable laws and regulations, and good stewardship of resources as we conduct business. Our success is dependent on our reputation with our associates, customers, suppliers, investors and the communities where we work and live.



HUMAN RIGHTS POLICY

Preamble:

Human rights are the basic rights, freedom, and standard of treatment belonging to all human beings by virtue of being human. Human rights are moral principles or norms for certain standards of human behaviour and are the fundamental rights to which a person is inherently entitled regardless of their age, ethnic origin, location, language, religion, ethnicity, or any other status, etc.

Purpose:

This policy aims at recognizing and protecting the dignity of all human being. Star Exports (“Star”) understands the role that companies can play in protection of human rights and consequences on infringement of the same. The policies framed are guided by the fundamental principles enumerated in the United Nations Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work (“ILO Declaration”).

Scope & Applicability:

The policy shall be applicable and binding on all employees, Directors, officers of the Company and its subsidiaries, Joint Venture Partner(s) and Associate Companies who in turn shall ensure that financial consultants, corporate agents, brokers, distributors, vendors, consultants, advisors, suppliers, contractors or other third parties engaged with the Company and its subsidiaries or affiliate companies, are aware of and abide by these policies, across all locations.

Community and Stakeholder Engagement

The Company is conscious of the fact that we are a part of the communities in which we operate. Therefore, we take efforts to engage with communities on human rights matters and with people in those communities, including indigenous peoples as well as other vulnerable and disadvantaged groups. The Company is dedicated to open and transparent communication with our stakeholders and understand that respectful and mutually beneficial relationships with the stakeholders is essential for the success of our business. It is important that we listen, understand, give due consideration and respond to the interests and concerns of its stakeholder groups. The Company is committed to acknowledging that local communities are stakeholders in all operations, that there will be access to reliable and timely information about exploration and development activities and transparent, sincere and respectful consultation with them prior to, during and after operations.

Prevention of Sexual Harassment

The Company commits to protect the employees from sexual harassment and ensures the compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition And Redressal) Act, 2013. The Company recognizes that protection of women against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions. Sexual harassment at the workplace is a form of discrimination. Sexual harassment can be physical and psychological in nature. An aggregation of incidents can also constitute sexual harassment even if one of the incidents considered on its own would not be harassing. The Company shall deal expeditiously and fairly as per the Policy for prevention of Sexual Harassment.

Misuse of Managerial Authority

The misuse of the authority vested in managerial authority for personal advantage or misusing it towards juniors or subordinates or a combination of both which results in adverse effects and breeds negativity is called abuse of managerial authority. The Company shall ensure that no managerial authority abuses their power.

Human Trafficking and Modern Slavery

Modern slavery is a fundamental violation of basic human rights and a crime. It takes various forms including slavery, servitude, forced or compulsory labour and human trafficking. These offences are closely related but legally distinct. The Company is committed to taking steps to ensure that modern slavery does not take place in any part of its own business including supply chains.

Safety in workplace

A healthy workplace is one where workers and managers collaborate to continually improve the health, safety and wellbeing of all workers and by doing this, sustain the productivity of the business. An effective workplace health and wellbeing program simultaneously addresses individual, environmental and organisational factors affecting worker wellbeing. Star is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions.

Honesty and Transparency and Individual Rights

As every individual is different therefore, we have adopted a transparent and progressive culture in the organization where there is openness between the managers and the employees. The employees are free to express their ideas and opinions. The employees are given freedom and an opportunity to explore their potential. We take every feedback from the employee / external source very seriously and go to the root cause of the complaint. The individual rights of all soul associated with the company is protected and preserved. We have the HR Department continuously working round the clock on this.

Time Policy & Work Life Balance

STAR has been one of the most employee friendly institutions in the country since its inception. We envisage and focus only on the output and the physical presence of a staff. There is flexible timing for employee with a cut of 8 hours as per the prescribed law. The normal office time is 10: 00 am to 6: 00 pm with breaks in between.

Human Dignity

Dignity at work is the principle of maintaining a healthy, safe and enjoyable place to go about your employment. Manpower is our greatest asset of a Company. Therefore, we believe in treating people with respect and dignity, respect, fairness, thereby fostering an atmosphere of open communication, care and trust. We respect the rights of individuals to achieve professional and personal balance in their lives. The Company commits to evolve and operationalize the construct of workplace dignity and develop and standardize a measure for it.

Child Labour and Forced Labour

The Company strongly opposes child labour or forced labour in any form. We are committed to ensuring no such instances of child or forced labour occur in any of our operations. It is a mandatory clause and also binds the value chain partners.

Equal Opportunity and Inclusion

The Company is committed to promoting a workplace that is free from discrimination and prejudice. We as a Company strive to be fair and equal in all our interactions with our customers and value chain partner and make endeavours to not discriminate on the basis of race, colour, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information protected veteran status, or any other characteristic protected by law. The scope of equal opportunity and non-discrimination extends to recruitment, employment, promotion, transfer, training, working conditions, wages and salary administration and employee benefits. Wages/remuneration, hours of work and social benefits, are based on local laws and regulations as well as prevailing market standards and practices. Diversity, Equity, and Inclusion is vital to creating and maintaining a successful workplace. The Company shall also ensure that people feel a sense of belonging in the workplace and the employees feel comfortable and supported by the organization.

Anti-bullying and harassment

The Company recognizes that a workplace free from bullying and harassment is integral to helping the workforce work in the organization. We are committed to respecting the rights of all our employees and strive to provide them with a work environment that's free from any physical, verbal or psychological harm. Our policies and systems have been designed to prevent such instances and address them in case they do arise.

Transparency

We strive to have a workplace in which open, transparent and honest communications are valued and respected. Promoting open and transparent communication is vital to every organization. Communication and transparency are the only means by which the employees can exchange ideas, information, communication, etc. Therefore, the Company is committed to promoting transparency and communication within the organisation.

Training and Awareness

The Company aims at incorporating and implementing the this policy across the organization and ensures that the employees are aware of this policies through training, media, emails, team meetings, and an annual certification process. The Company also makes the employees aware of related laws, guidelines and applicable policies when they join the organization and are given periodic reminders during their tenure, human rights, engagement with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities.

Review and due diligence

Review and due diligence are a structured and systematic process of understanding with whom the company does or will do business. This policy sets out the minimum required due diligence procedures for doing business with certain third-party service providers and suppliers. This policy helps identify and manage human rights impact, risks and opportunities that continuously help strengthen our workplace policies, practices and programs. In case of any discrepancies found in this policy, the relevant portions of the above-mentioned policies would be the standard.

Reporting of Violations

The Company believes in taking feedback from its stakeholders in order to make improvements in these policies. The Company also has a grievance redressal mechanism for dealing with the grievances related to these policies. The feedback and grievances reported by the employees shall be confidential and secure. The following policies (grievance mechanism) provides all stakeholders a secure and 24x7 access to raise grievances and to report any breach of policies and procedures in the Company:

a) Whistle Blower Policy

b) Policy on Prevention and Redressal of Sexual Harassment at Workplace
The Whistle Officer/ Whistle Committee / Internal Committee of the Company shall be responsible to deal with the grievances related to the breach of these policies.

Summary

This policy has been framed by the Company out of respect for human rights and to ensure there is no violation of human rights within the organization.

Amendment

The Company reserves the right to amend this policy at any time.
