



ZYETA INTERIORS PVT. LTD.

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ESG- Policy Manual – HR & Ethics

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DOC NO	: ZYETA/ESG/POLICY
ISSUE NO	: 02
REV NO	: 00
INITIAL ISSUE DATE	: 5th February, 2023
FIRST ANNUAL REVIEW DATE:	5th February, 2024

AMENDMENT SHEET

Date	Issue No	Rev No	Reason	Remarks
5 th March, 2023	01	00	INITIAL ISSUE DATE	-
5 th March, 2024	02	00	FIRST ANNUAL REVIEW DATE	-

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SOCIAL DIALOGUE POLICY

ZYETA/ESG/P-01

1. Introduction

At Zyeta, we prioritize fostering an inclusive and transparent workplace, where social dialogue is actively encouraged. As a leader in design consultation and project management through BIM in India, we recognize the importance of positive relationships with employees, clients, and stakeholders. Social dialogue—defined as the exchange of information, consultation, and negotiation between employers and employees—plays a critical role in promoting trust, cooperation, and mutual respect. This policy establishes a framework for enhancing social dialogue at Zyeta, ensuring it contributes to better working conditions, increased productivity, and supports our commitment to sustainability, responsible business practices, and a fair work environment.

2. Scope of Application

2.1 Who is Covered? This policy applies to all employees, management personnel, contractors, suppliers, and other stakeholders engaged with Zyeta.

2.2 Business Area or Operations Covered: The policy is applicable across all design consultation and project management services provided by Zyeta, including the integration of Building Information Modeling (BIM).

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Management Team

- Ensure that all employees and their representatives are given an opportunity to participate in social dialogue initiatives.
- Provide necessary resources and support to employee representatives to engage in constructive discussions.
- Actively engage in dialogues to resolve issues related to working conditions, employee welfare, and other concerns.
- Uphold transparency and fairness in all negotiations or consultations involving employees.

- Ensure that all social dialogue processes are in line with legal and regulatory frameworks, as well as Zyeta’s ethical standards.

3.2 Employee Representatives / Trade Unions

- Represent employees’ concerns and interests effectively, ensuring that they are heard and considered in all discussions.
- Promote constructive engagement with management, focused on solutions and mutual benefit.
- Communicate the outcomes of dialogues back to the employees they represent, ensuring transparency and accountability.
- Ensure that employee grievances are addressed in an unbiased and timely manner.

3.3 Employees

- Participate actively in social dialogue initiatives, either directly or through their chosen representatives.
- Communicate concerns and suggestions constructively to foster a positive work environment.
- Respect decisions made through social dialogue processes and work towards their successful implementation.

4. Application of this Policy

This policy shall be implemented through regular employee consultations, stakeholder engagement sessions, feedback mechanisms, and adherence to collective bargaining agreements where applicable.

5. Governance of this Policy

The Social Dialogue Policy is governed by Zyeta’s Senior Management Team, with support from the Human Resources (HR) Department and the ESG Committee. These bodies are responsible for ensuring the policy’s effective implementation, promoting a culture of open dialogue, and facilitating communication across all levels of the organization. Senior management will oversee the policy’s integration into Zyeta’s daily operations, while the HR Department will manage the practical aspects of communication and consultation.

6. Social dialogue Policy

6.1 Employee Representatives & Trade Unions

Zyeta recognizes the importance of employee representatives and trade unions in the consultation and negotiation processes. In accordance with Indian labor laws, employees have the right to form and join trade unions, and Zyeta supports open, constructive discussions with them. Recognized employee representatives or trade unions will be actively engaged in decision-making processes related to labor conditions, working hours, wages, and other key aspects of employment. By involving these representatives in discussions, Zyeta ensures a balanced, fair approach to addressing employee needs and maintaining positive labor relations.

6.2 Collective Bargaining

Zyeta is committed to engaging in collective bargaining with recognized employee representatives or trade unions when necessary. This process will address important matters such as compensation, benefits, working conditions, and any other issues that directly impact employees. All collective bargaining will be conducted in good faith and in full compliance with applicable labor laws to ensure fair and equitable outcomes for both employees and the company. Through collective bargaining, Zyeta aims to maintain a harmonious working environment, ensuring that employee concerns are addressed while supporting the organization's long-term goals.

6.3 Career Development Agreement

Zyeta promotes continuous learning and career development for employees through collective bargaining with employee representatives. In compliance with the Factories Act, 1948, and other applicable labor regulations, Zyeta has established written agreements on career management, training, and skill development. These agreements are designed to provide employees with growth opportunities and ensure access to career advancement through structured training programs.

6.4 Structured Social Dialogue

At Zyeta, social dialogue will be conducted in a structured manner through regular meetings, forums, and platforms that provide both employees and management the opportunity to discuss relevant issues. These discussions will be formalized in meeting minutes, which will be shared with all involved parties to ensure transparency and accountability. Regular review meetings will be scheduled to allow for continuous feedback, suggestions, and the resolution of any concerns. This approach ensures that social dialogue is consistently maintained, fostering an environment of cooperation and mutual understanding while addressing ongoing workplace issues effectively.

6.5 Workplace Safety Agreement

Zyeta ensures the health and safety of its employees by engaging in collective bargaining with employee representatives to agree on safety protocols. In accordance with the Factories Act, 1948 and the Occupational Safety, Health and Working Conditions Code, 2020, Zyeta has established written agreements that address employee health and safety, which are reviewed and signed by all relevant stakeholders. These agreements ensure that health and safety measures are continually updated in line with legal requirements.

6.6 Insufficient Communication Flow

In regions with low trade union membership or where union activities are restricted, the absence of effective social dialogue can result in unresolved employee concerns, lower morale, and potential disputes. Zyeta is committed to fostering an open, transparent communication environment, even in such areas. We implement regular feedback mechanisms, such as surveys and open forums, and encourage constructive discussions to address both employer and employee needs. This ensures that our workforce feels heard, motivated, and engaged, allowing for a collaborative environment where concerns are addressed, and both employer and employee goals are met.

6.7 Transparency & Communication

Encouraging open and transparent communication channels within the organization. Facilitating regular employee feedback mechanisms, such as surveys, suggestion boxes, and town hall meetings, to foster employee engagement and address concerns. Promoting a culture of recognition and appreciation to celebrate employee achievements and contributions. Encouraging employees to actively participate in social initiatives and community service activities. Collaborating with external organizations or NGOs to address social issues and contribute to community development. At Zyeta, transparency and open communication are integral to fostering a positive workplace. Management and employee representatives will ensure that communication channels remain clear, consistent, and open. Information related to company performance, policies, operational changes, and other important matters will be shared proactively with employees. This ensures that all employees are informed and involved in the decision-making process. By maintaining transparency in communication, Zyeta builds trust, promotes alignment between management and employees, and empowers employees to make well-informed decisions that contribute to the organization's success.

6.8 Bargained Wage Agreements

Zyeta ensures fair and transparent wage structures by negotiating collectively with employee representatives. In compliance with the Payment of Wages Act, 1936, and the Minimum Wages Act, 1948, agreements on employee wages are documented and signed by relevant stakeholders. These agreements establish equitable compensation practices and are designed to align with industry standards and applicable legal frameworks.

6.9 Employee Welfare

Zyeta is deeply committed to promoting employee welfare through ongoing consultations about various aspects of work-life balance, health and safety, career development, and social initiatives. The company ensures that employees have a voice in decisions that impact their well-being. Any changes to workplace policies, working hours, or employee benefits will be communicated well in advance, and employees will be given opportunities to provide feedback or raise concerns before final decisions are made. This proactive approach to employee welfare supports a positive, supportive work environment where employees feel valued and respected.

6.10 Working Time Negotiation

Zyeta adheres to the Factories Act, 1948, Shops and Establishment Act, 1953, and other relevant labor laws regarding working hours, overtime, and employee leave. Collective bargaining agreements are established with employee representatives to ensure fair and legal working hours, overtime compensation, and leave entitlements. These agreements are reviewed and signed by both parties to ensure the proper balance between work and rest.

6.11 Employee Apathy

As union influence declines, employee apathy can increase, leading to disengagement in workplace improvements, skill development, and safety initiatives. This may affect morale, productivity, and overall work culture. Zyeta recognizes the importance of actively engaging our workforce in all aspects of the business. We offer skill development programs, encourage participation in decision-making processes, and create opportunities for employees to contribute to workplace enhancements. By keeping employees engaged and motivated, we ensure they remain committed to the company's mission, fostering a positive and proactive work culture that drives both individual and organizational success

6.12 Labor Representation Groups

Zyeta acknowledges the importance of structured social dialogue and recognizes the role of employee representatives or representative bodies, such as labor unions, works councils, or other employee agencies. In compliance with Indian Labor Laws (Industrial Disputes Act, 1947), Zyeta engages with employee representatives to facilitate collective bargaining, consultations, and the addressing of employee concerns. This collaboration aims to promote transparent communication, effective decision-making, and employee well-being across the organization.

6.13 Non-Compliance with Labor Laws

In regions where labor laws are weak or unions are not permitted, companies may struggle to meet employee needs regarding wages, working conditions, and occupational health and safety. This can expose companies to legal risks, conflicts, and reputational damage. Zyeta is fully committed to complying with all local and international labor laws in the regions where we operate. We ensure fair compensation, prioritize worker welfare, and implement strong safety protocols to meet legal and ethical standards. By adhering to labor laws, Zyeta minimizes risks while promoting responsible business practices and a positive reputation.

6.14 Equity Inclusion Framework

Zyeta is committed to fostering a diverse, equitable, and inclusive workplace. In alignment with the Equal Remuneration Act, 1976, and the Prevention of Sexual Harassment Act, 2013, Zyeta engages in collective bargaining with employee representatives to address discrimination, harassment, and promote an inclusive culture. Agreements focus on ensuring fair treatment for all employees, creating a work environment free from discrimination and harassment, and upholding diversity and equity.

6.15 Occupational Health and Safety Issues

Providing a safe and healthy work environment that complies with applicable health and safety regulations. Implementing measures to prevent occupational hazards, accidents, and injuries. Encouraging employee well-being through initiatives that promote physical and mental health, work-life balance, and stress management. Occupational health and safety concerns are critical, particularly in high-risk industries like construction and project management, where employees may face physical hazards. Without effective social dialogue, these issues may go unaddressed. Zyeta places the highest priority on the health and safety of our employees, contractors, and partners. We follow rigorous safety protocols across all projects and continuously assess potential risks.

By actively engaging employees in identifying and addressing hazards, we ensure a safe working environment that complies with all regulations and provides a secure, healthy space for everyone involved in our operations.

6.16 Substandard Working Conditions

If wages, benefits, job security, or working conditions are not properly managed, employees may become dissatisfied. This is especially true in industries like design consultation and project management, where employees may experience high stress, heavy workloads, or safety risks. At Zyeta, we prioritize the creation of a healthy, safe, and supportive work environment.

We ensure that our wages, benefits, and working conditions meet industry standards and are regularly reviewed for improvement. Additionally, we emphasize work-life balance and focus on maintaining safety and employee well-being, which in turn enhances employee satisfaction and productivity.

6.17 Lack of Skills Development

Without a framework for social dialogue, employee development needs—particularly for technical skills like BIM and project management—may go unmet, leading to a less skilled workforce and reduced operational efficiency. Zyeta is dedicated to the continuous professional development of our employees. We offer access to ongoing training and development opportunities in emerging technologies, such as BIM, and other industry-relevant skills. This ensures that our team stays competitive and capable of delivering high-quality services. By investing in skill development, Zyeta enhances both individual career growth and the overall performance of the organization.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Employee Representatives & Trade Unions	Strengthen employee representation	Percentage of employees represented by unions (Percentage)	100 % (→)
2	Collective Bargaining	Increase collective bargaining agreements	Percentage of employees covered by collective bargaining (Percentage)	95 % (↑)

3	Career Development Agreement	Increase career development agreements	Percentage of employees with career development agreements (Percentage)	95% (↑)
4	Structured Social Dialogue	Increase structured social dialogue	Number of structured dialogue sessions (Count)	11 sessions (↑)
5	Workplace Safety Agreement	increase participation in safety pact	Percentage of employees signed safety pact (Percentage)	100% (→)
6	Insufficient Communication Flow	Improve effectiveness of social dialogue	Employee feedback on dialogue effectiveness (Score 1-10)	10/10 (→)
7	Transparency & Communication	Improve transparency and communication	Number of communication channels (Count)	3 channels (↑)
8	Bargained Wage Agreements	Increase percentage of collectively bargained wages	Percentage of employees with collectively bargained wages (Percentage)	95%(↑)
9	Employee Welfare	Improve employee welfare initiatives	Number of employee welfare programs (Count)	5 programs (→)
10	Working Time Negotiation	Improve working time negotiations	Percentage of employees with negotiated working hours (Percentage)	90% (↑)
11	Employee Apathy	Reduce employee apathy	Percentage of employees showing active engagement (Percentage)	98 % (↑)
12	Labor Representation Groups	Strengthen employee representation group	Percentage of employees in representation groups (Percentage)	95% (↑)
13	Non-Compliance with Labor Laws	Ensure full compliance with labor laws	Number of compliance violations (Count)	0 violations (→)

14	Equity Inclusion Framework	Increase equity and inclusion initiatives	Number of diversity and inclusion initiatives (Count)	10 initiatives (↑)
15	Occupational Health and Safety Issues	Improve health and safety standards	Number of health and safety incidents reported (Count)	0 incidents (→)
16	Lack of Effective Social Dialogue	Improve effectiveness of social dialogue	Employee feedback on dialogue effectiveness (Score 1-10)	10/10 (→)
17	Lack of Skills Development	Increase skills development programs	Percentage of training and development programs (Count)	100% programs (→)

8. Disciplinary Action for Policy Violations

Zyeta is committed to promoting a culture of mutual respect and collaboration. However, violations of this policy will be addressed accordingly. Disciplinary actions may include a Verbal or Written Warning for minor, initial violations or a Formal Warning if violations continue or there is failure to engage in the social dialogue process. In cases of severe violations, such as refusing to engage in good faith dialogue, intentionally obstructing the process or behavior that disrupts the social dialogue mechanism, termination of employment may occur. Zyeta values open communication and expects all employees to participate in a constructive manner.

9. Distribution

The Social Dialogue Policy will be distributed to all employees to ensure wide access and understanding. It will also be made available on the company's intranet for easy reference by all staff members. New hires will be introduced to the policy as part of their onboarding process, ensuring they are aware of Zyeta's commitment to social dialogue from the outset. In addition, the policy will be shared with employee representatives and trade unions to ensure they are informed and involved in its implementation and ongoing development. This approach guarantees that all parties have access to the policy and can engage with it effectively.

10. Annual Review

To ensure the continued relevance and effectiveness of the Social Dialogue Policy, it will be reviewed annually. This review process will assess whether the policy aligns with the evolving needs of both the company and its employees. Feedback will be gathered from employees, management, and trade unions to evaluate the policy's impact and effectiveness. Additionally, any changes in legal or regulatory frameworks will be considered to ensure compliance. The review will allow Zyeta to make necessary adjustments and improvements to enhance the policy's role in fostering transparent, open communication and a positive working environment.

11. Conclusion

Zyeta is committed to creating a socially responsible and supportive work environment that values the well-being, safety, and development of its employees. By adhering to this social policy, we aim to foster diversity, ensure employee health and safety, promote work life balance, engage employees, and make a positive impact within the organization and the border community. Zyeta is committed to social dialogue, believing that fostering mutual respect and transparency creates a more sustainable, productive, and fulfilling workplace. By actively engaging in social dialogue, we aim to address employee concerns, improve satisfaction, and maintain a harmonious working environment for all stakeholders. This policy outlines the processes, responsibilities, and objectives that guide our dedication to effective communication within the organization. Through continuous review and enhancement of this policy, Zyeta will prioritize employee well-being while advancing our mission to provide world-class design consultation and project management services, ensuring long-term success for both our employees and the company.

CAREER MANAGEMENT AND TRAINING POLICY

ZYETA/ESG/P-02

1. Introduction

We at Zyeta Interiors Private Limited. Zyeta are committed to fostering the professional growth and career development of its employees. This Career Development Policy outlines the framework and opportunities available to employees within the organization. The policy aims to support employees in their career aspirations, enhance their skills and knowledge, and provide a clear pathway for growth and advancement.

2. Scope of Application

2.1 Who: This policy applies to all employees, including permanent, contractual, and temporary staff at Zyeta.

2.2 Business Area or Operation Covered: This policy is applicable to all departments and functions across the organization, including design consultation, project management, and Building Information Modeling (BIM) services.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Management

- Ensure the implementation and continuous improvement of this policy.
- Allocate resources for training, career development, and performance evaluation.
- Monitor the progress of employees' professional growth and provide guidance.
- Regularly review the effectiveness of training programs and adjust as needed.

3.2 Human Resources (HR) Department

- Administer recruitment and onboarding processes, ensuring alignment with organizational goals and values.
- Design and implement training programs that meet the needs of employees and Zyeta.
- Track employee development and career progression.
- Coordinate performance evaluations and feedback sessions.

3.3 Employees

- Take ownership of their career growth, participating actively in training and development opportunities.
- Engage with supervisors to set professional development goals and seek guidance for improvement.
- Provide feedback to HR and management on training programs and career development opportunities.

3.4 Line Managers and Supervisors

- Support the career development of employees by identifying training needs and providing guidance.
- Regularly assess employee performance and provide constructive feedback.
- Assist in setting career goals and facilitate mobility and growth within the organization.

4. Application of the Policy

This policy applies to Recruitment and onboarding training, Leadership development, Skill enhancement programs, Compliance and ESG training, Continuous learning opportunities

5. Governance of this Policy

The Career Management and Training Policy is governed by Zyeta's Senior Management Team, Human Resources (HR) Department, and relevant business leaders. These bodies are responsible for overseeing the implementation and continual improvement of the policy. The HR Department will manage the day-to-day operational aspects, including training programs, career development initiatives, and performance reviews. Senior Management will ensure that the policy aligns with Zyeta's strategic goals and ESG objectives.

6. Career management and training Policy

6.1 Highly skilled Retention Challenge

The specialized nature of fields like BIM and sustainability management makes it difficult to retain highly skilled professionals. Competition for top talent is fierce, and retaining these experts requires more than just competitive compensation. Zyeta will offer attractive compensation packages, career growth opportunities, and a positive work culture to attract and retain the best professionals.

Clear career progression paths, ongoing skill development programs, and a supportive work environment will foster long-term loyalty and reduce the risk of losing valuable talent to competitors, ensuring Zyeta's continued success.

6.2 Career Mobility

Career mobility at Zyeta enables employees to advance and take on new challenges. The objective is to foster internal career growth and retention. Internal job postings will be shared with employees before external recruitment begins, providing them with opportunities for career progression. Performance reviews will include career discussions to identify future paths and ensure employees' aspirations align with organizational goals. Additionally, Zyeta encourages employees to explore cross-functional roles, broadening their skill sets and enhancing their career development within the company.

Limited career mobility can lead to employee dissatisfaction and increased turnover, particularly for those seeking growth opportunities and varied experiences. Zyeta will encourage career mobility by offering job rotation, cross-functional training, and clear promotion paths. By providing opportunities for employees to gain diverse skills and experiences within the company, Zyeta will foster long-term engagement and career development. Supporting internal mobility will ensure employees remain motivated and have a clear sense of direction, reducing the risk of stagnation and promoting a more dynamic, committed workforce.

6.3 Skill Gap Challenge

The rapidly evolving nature of technology, especially in fields like BIM and sustainability management, creates a risk of skill shortages. As industry standards change, the gap between the required skills and the available workforce may widen. Zyeta will address this challenge by continuously assessing the skills needed across its operations and implementing targeted training and development initiatives. This proactive approach will ensure employees remain equipped to meet the latest industry standards, adopt new technologies, and maintain a competitive edge in a constantly changing market environment, keeping Zyeta at the forefront of innovation.

As employees progress in their careers, they may be placed in roles that no longer align with their developing skill sets, leading to disengagement or inefficiency. Zyeta will address this risk by implementing a robust performance evaluation and feedback system. This will ensure employees are consistently placed in roles that match their competencies and career aspirations. Additionally, opportunities for cross-functional training and career mobility will keep employees engaged and allow them to develop diverse skills. By aligning roles with individual growth trajectories, Zyeta will maintain a highly effective and motivated workforce.

6.4 Performance Evaluation

Performance evaluations are crucial for tracking employee progress, aligning individual performance with organizational goals, and fostering continuous growth. Bi-annual evaluations will assess both technical competencies and personal attributes. Feedback will be provided to highlight strengths and pinpoint areas for improvement, creating a foundation for personalized development plans. Performance evaluations will also identify training needs, allowing Zyeta to provide targeted learning opportunities to ensure employees continue developing the skills required for their current roles and future career growth.

6.5 Recruitment

Recruitment is the foundation of building a skilled workforce at Zyeta. The goal is to attract talented professionals who align with the company's values and operational goals. Job openings will be shared through various platforms and internal networks. The selection process will focus on evaluating technical proficiency and cultural compatibility. Interviews will be designed to assess the candidates' expertise, experience, and potential for long-term growth within the company. This ensures that new hires are well-suited to contribute to Zyeta's growth and are equipped to thrive in their roles.

6.6 Professional Development

Professional development is a key aspect of employee satisfaction and career growth. Zyeta encourages employees to enhance their knowledge, skills, and qualifications through various opportunities. Employees will be supported in attending industry conferences, webinars, and networking events to stay updated on trends and best practices. Zyeta will also subsidize certifications and advanced training programs, aligning with both the company's goals and the employees' career ambitions. Regular workshops and knowledge-sharing sessions will promote continuous learning, fostering a culture of ongoing professional growth within the organization.

6.7 Employee Turnover

In specialized industries, high turnover can be a significant risk as skilled professionals may leave for better opportunities. Younger generations, in particular, prioritize career development and skill enhancement. Zyeta aims to reduce turnover by fostering a culture that prioritizes career growth and ongoing development. This will include offering continuous training, recognition, and opportunities for progression. By providing employees with clear paths for growth and investing in their professional development, Zyeta will retain top talent, creating a stable and skilled workforce that drives long-term success for the organization.

6.8 Knowledge and Expertise Drain

As employees retire or leave the company, specialized knowledge and expertise, particularly in BIM and sustainability, may be lost, presenting a significant risk to continuity and innovation. To address this, Zyeta will implement knowledge-sharing initiatives, mentorship programs, and succession planning strategies. Senior employees will be encouraged to transfer their knowledge to junior staff, ensuring that valuable expertise is retained within the organization. These efforts will help preserve critical skills, reduce disruptions caused by employee turnover, and maintain a strong foundation of knowledge for future generations of employees.

6.9 Change Resistance Barrier

Employees may resist adopting new technologies or methods, particularly in a specialized industry where change can be perceived as disruptive. This resistance could hinder innovation and slow the company's ability to stay competitive. Zyeta will address this risk by fostering a culture of continuous improvement, where employees are actively involved in the adoption of new technologies. Tailored training programs will help employees understand the benefits of new tools and methodologies, and provide the support needed to build confidence. By addressing concerns and encouraging open dialogue, Zyeta will ensure smoother transitions to new systems and processes.

6.10 Skills Development Training

At Zyeta, we are committed to fostering continuous learning and professional development for our employees. We offer a range of training programs to enhance job-specific skills and provide opportunities for career advancement. These training sessions are offered through in-person workshops, on-the-job learning, and online courses, ensuring accessibility for all employees. Our goal is to equip employees with the tools they need to excel in their current roles and grow professionally.

Training and development are essential to empower employees to reach their full potential. Zyeta's goal is to enhance employees' technical expertise, leadership skills, and knowledge of the industry. Annual assessments will identify skills gaps, leading to targeted internal and external training opportunities. These programs will focus on areas such as BIM technologies, sustainability, project management, and interpersonal skills. Employees will also be encouraged to pursue professional certifications that align with their career aspirations, ensuring both personal growth and a stronger organizational performance.

6.11 Inefficient Learning Programs

Training programs that do not align with employee needs or organizational goals can lead to inefficiencies and skill gaps. To avoid this risk, Zyeta will regularly review and update its training and development programs. These programs will be tailored to industry trends, employee needs, and organizational objectives to ensure their effectiveness. Employee feedback will be collected to assess the relevance of training initiatives, and adjustments will be made as needed. By ensuring that training is aligned with both individual and organizational goals, Zyeta will maximize the impact of its professional development efforts.

6.12 Mentorship and Coaching

Zyeta recognizes the value of mentorship and coaching in career development. Employees will have access to mentorship programs or opportunities to work closely with experienced professionals in the organization. Regular coaching and feedback sessions will be conducted to support employees in their development journey and provide guidance on achieving their career goals.

6.13 Individual Development Planning

Employees will have the opportunity to engage in individual development planning discussions with their supervisors or managers on a regular basis. Individual Development Plans (IDPs) will be created to identify career goals, assess current skills and competencies, and outline development activities necessary to achieve their career objectives. IDPs will be reviewed periodically to track progress, make adjustments, and align development efforts with evolving business needs.

6.14 Employee Burnout

Employees in high-demand fields like BIM and project management are at risk of burnout due to workload pressure and stress. This can negatively impact job satisfaction and performance. Zyeta acknowledges the importance of work-life balance and overall well-being. To combat burnout, Zyeta will monitor workloads, encourage open communication, and provide resources for stress management. Regular feedback sessions will ensure employees feel supported in their roles and help identify any early signs of burnout. Creating a healthy work environment will not only improve employee well-being but also maintain productivity and engagement.

6.15 Promoting Internal Opportunities

Zyeta believes in providing employees with diverse opportunities for growth and career development within the organization. We actively promote internal mobility through structured programs that support vertical, horizontal, geographical, and transversal movement across different roles, departments, or locations. This internal mobility strategy enables employees to expand their skill sets, take on new challenges, and advance within the company while fostering a more dynamic and versatile workforce.

6.16 Tech Change Impact

The fast pace of technological advancements in BIM and sustainability practices presents a risk if employees fail to stay updated on new tools and methodologies. Technological changes can leave employees behind if they do not engage in continuous learning. To mitigate this risk, Zyeta will ensure ongoing training and development opportunities focused on the latest technologies. This will foster a culture of adaptability, with employees equipped to embrace and utilize emerging technologies. By investing in professional development programs that support lifelong learning, Zyeta will remain at the cutting edge of industry standards.

6.17 Internal Career Advancement

Zyeta will promote internal job postings and encourage employees to apply for suitable positions within the organization. Transparent and fair selection processes will be followed to assess internal candidates' qualifications and suitability for promotional opportunities. Employees will be provided with the necessary guidance and resources to prepare for internal interviews and enhance their chances of success.

6.18 Education and Certification Support

Zyeta provides financial assistance or sponsorship for employees pursuing relevant educational programs, certifications. The support provided will be based on the relevance of the program to the employee's role, business needs, and budgetary considerations.

6.19 Employee Growth Plan

Zyeta encourages the personal and professional growth of every employee by creating tailored career development plans. These plans are designed in collaboration with each employee, outlining their short-term and long-term career goals, strengths, and areas for improvement. We provide actionable steps, resources, and mentorship to help employees achieve their professional aspirations, ensuring that they are supported in their continuous growth and career progression.

6.20 Performance and Development Reviews

Performance and development reviews will be conducted on a regular basis to evaluate employee performance, identify development needs, and discuss career aspirations. Feedback received during performance reviews will inform the development planning process and support employees in their career advancement.

Zyeta emphasizes the importance of performance assessments to ensure continuous improvement and professional growth. We regularly assess individual performance through a combination of quantitative and qualitative evaluations, providing feedback and identifying areas for development. These assessments enable us to recognize top performers, address any performance gaps, and offer support to employees. The assessment process ensures fair and consistent reviews aligned with our organizational goals.

6.21 External Learning Opportunities

Zyeta encourages employees to participate in industry conferences, seminars, workshops, and other external learning opportunities. Employees may be granted leave or provided with financial support to attend relevant external events that contribute to their professional growth and knowledge enhancement.

6.22 Succession Planning

Zyeta recognizes the importance of succession planning for critical positions within the organization. The company will identify high-potential employees and provide them with development opportunities to prepare them for future leadership roles.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Highly skilled Retention Challenge	Improve retention of highly skilled professionals	Retention rate of skilled professionals (Percentage)	100% retention (➡)
2	Career Mobility	Increase career mobility opportunities	Percentage of employees with career mobility (Percentage)	80 % (➡)

3	Skill Gap Challenge	Mitigate skill shortage and specialization risks	Percentage of critical skills filled (Percentage)	95% of critical roles (➡)
4	Performance Evaluation	Improve performance evaluation process	Percentage of employees with performance reviews (Percentage)	100% (➡)
5	Recruitment	Increase recruitment efficiency	Number of new hires (Count)	60 new hires (➡)
6	Professional Development	Increase professional development opportunities	Percentage of professional development programs offered (Count)	100% programs (➡)
7	Employee Turnover	Reduce employee turnover	Employee turnover rate (Percentage)	2% turnover (↓)
8	Knowledge and Expertise Drain	Reduce knowledge and expertise drain	Percentage of employees with knowledge transfer programs (Percentage)	100% (➡)
9	Change Resistance Barrier	Reduce resistance to change	Percentage of employees resistant to change (Percentage)	2% (↓)
10	Skills Development Training	Increase skills development training	Percentage of employees completing skills development programs (Count)	100% (➡)
11	Inefficient Learning Programs	Improve training and development program effectiveness	Percentage of effective training programs (Percentage)	100% effectiveness (➡)
12	Mentorship and Coaching	Increase mentorship and coaching opportunities	Number of mentorship and coaching sessions (Count)	100 sessions (➡)
13	Individual Development Planning	Increase individual development planning	Percentage of employees with individual development plans (Percentage)	95% (➡)
14	Employee Burnout	Reduce employee burnout	Percentage of employees reporting burnout (Percentage)	1% (↓)
15	Promoting Internal Opportunities	Increase promotion of internal opportunities	Percentage of internal opportunities promoted (Percentage)	75% internal opportunities (➡)

16	Tech Change Impact	Reduce technological change risk	Percentage of employees trained for new technologies (Percentage)	100% (➡)
17	Internal Career Advancement	Increase internal job postings and promotions	Percentage of positions filled internally (Percentage)	75% internal promotion (➡)
18	Education and Certification Support	Increase education and certification support	Number of employees supported for education/certification (Count)	30 (➡)
19	Employee Growth Plan	Increase employee growth planning	Number of employees with growth plans (Count)	90 (➡)
20	Performance and Development Reviews	Improve performance and development reviews	Number of employees receiving performance reviews (Count)	100% (➡)
21	External Learning Opportunities	Increase external learning opportunities	Percentage of employees attending external learning programs (Count)	50 % (➡)
22	Succession Planning	Improve succession planning	Number of succession plans developed (Count)	5 plans (➡)

8. Disciplinary Action for Policy Violations

The purpose of this policy is to foster mutual respect and professional growth within the company. However, violations will be addressed through the appropriate channels. Disciplinary actions may include a Verbal or Written Warning for minor non-compliance, a Formal Disciplinary Action for repeated violations or failure to engage in career management processes, and, in severe cases, Termination of Employment. Termination may occur when violations significantly impact the company's operational goals or hinder the development of employees. Zyeta is committed to maintaining a supportive environment and expects all employees to adhere to these standards to ensure mutual success.

9. Distribution

This policy will be distributed to all current employees through email and made available on the company's intranet for easy access. Employees will be encouraged to read and familiarize themselves with the policy to understand the guidelines and expectations set forth. Additionally, all new hires will receive a copy of this policy as part of their onboarding process, ensuring that they are informed from the outset about the company's practices and procedures. By providing accessible distribution channels, Zyeta aims to ensure that all employees are aligned with the company's values and operational standards.

10. Conclusion

This Career Development Policy will be periodically reviewed and updated to align with changing business needs, industry trends, and best practices in career development. Zyeta is committed to investing in its employees' professional growth and development, fostering a culture of continuous learning.

CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING POLICY

ZYETA/ESG/P-03

1. Introduction

This Child Labor Policy outlines the commitment of Zyeta Interiors Private Limited ' Zyeta ' to the eradication and prohibition of child labor and the protection of children's rights within our operations. It establishes guidelines and procedures to ensure compliance of Child Labor (Prohibition & Regulation) Act-1986 regulations and rules framed thereunder, and international standards. All employees, contractors, suppliers, and stakeholders are expected to uphold this policy without any breach.

2. Scope of Application

2.1 Who is Covered: This policy applies to all employees, contractors, consultants, suppliers, and business partners engaged with Zyeta, ensuring that no individual within our operations or supply chain is subjected to child labor, forced labor, or human trafficking.

2.2 Business Area or Operation Covered: This policy applies to all aspects of Zyeta's operations, including design consultation, project management services, and Building Information Modeling (BIM). It also extends to all supply chain activities, as well as vendor and supplier operations, ensuring compliance with ethical labor standards across our business ecosystem.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Senior Management

- Oversee the implementation of this policy and ensure compliance across all levels of the organization.
- Allocate necessary resources for training, monitoring, and continuous improvement.

3.2 Human Resources (HR)

- Conduct awareness programs to educate employees on child labor, forced labor, and human trafficking.
- Monitor hiring practices to ensure adherence to the policy.
- Investigate any reports of violations and take corrective action.

3.3 Procurement Team

- Vet and monitor suppliers and contractors to ensure they comply with the company's labor standards.
- Incorporate child labor, forced labor, and human trafficking clauses in procurement agreements.

3.4 Compliance and Legal Team

- Regularly review labor practices and ensure that Zyeta adheres to all applicable local and international laws regarding labor rights and human trafficking.
- Coordinate the annual review of the policy and manage any legal implications.

3.5 Employees

- Comply with the policy, report violations or concerns, and actively participate in training programs.

3.6 Suppliers and Contractors

- Uphold the highest standards of labor rights in line with Zyeta's policy.
- Provide evidence of compliance with labor laws during audits or assessments.

4. Application of the policy

Zyeta child labor policy is our position on employing minors and aims to ensure that our company, its subsidiaries and everyone we're connected with follows the law and cares for children's interests and firmly believes that child labor is a violation of children's rights, hinders their development, and undermines social and economic progress. As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in children's exploitation and also helps end it to the best of our ability, we are committed to:

- a) Prohibiting and eliminating child labor in all its forms within our operations and supply chains.
- b) Complying with national and international laws and regulations regarding child labor.
- c) Promoting awareness, education, and capacity-building initiatives to prevent child labor.
- d) Collaborating with relevant stakeholders to address the root causes and consequences of child labor.

4. Governance of this Policy

The governance of this policy lies with Zyeta's Senior Management Team, in collaboration with the Human Resources (HR) Department, Legal and Compliance Team, and the ESG Committee. This governance structure ensures that the policy is effectively implemented, monitored, and adhered to across all operations. Any updates to the policy will be communicated and enforced by these departments.

5. Child labor, forced labor, and human trafficking Policy

5.1 Definitions

a) Child: means a person who has not completed his fourteenth year of age as per Child Labour (prohibition & Regulation Act, 1986) or as defined by the International Labor Organization (ILO) Convention No. 138, a child refers to any person under the age of 18 years.

b) Child Labor: Child labor includes all forms of work that deprive children of their childhood, interferes with their ability to attend regular schooling, and is mentally, physically, socially, or morally harmful.

5.2 Prohibited Activities

5.2.1. Employment of Children: As per our policy, no child below the legal minimum age for employment, as defined by applicable laws and regulations, shall be employed within the company or its supply chains.

5.2.2. Hazardous Work: As per our policy, no person below the age of 18 years shall be engaged in any work that is considered hazardous or likely to jeopardize their health, safety, or moral development, as defined by relevant laws and regulations.

5.2.3. Forced Labor: As per our policy, no child or any person shall be subjected to any form of forced or compulsory labor, including debt bondage, slavery, or trafficking.

5.2.4. Supplier Compliance: As per our policy, we expect our suppliers and business partners to adhere to the same standards regarding child labour and ensure that children below the specified age is not used at any stage of their operations or supply chains.

5.3 Prevention and Due Diligence

5.3.1. Risk Assessment: We will conduct regular risk assessments to identify and evaluate potential child labor risks within our operations and supply chains

5.3.2. Due Diligence: We will implement due diligence processes to prevent and mitigate child labor risks, including:

- a) Establishing supplier evaluation procedures that include of child labor criteria.
- b) Conducting regular audits and inspections to verify compliance with this policy.
- c) Providing training and awareness programs for employees, contractors, and suppliers on child labor issues.
- d) Encouraging reporting mechanisms to confidentially report any suspected child labor practices.
- e) Educating our staff on youth work laws and show them how to report child labour if they see or suspect it.
- f) Educating our staff on youth work laws and show them how to report child labour if they see or suspect it.
- g) Educating our staff on youth work laws and show them how to report child labor if they see or suspect it.

5.4 Remediation and Reporting

5.4.1. Reporting and Investigation: Any instances or suspicions of child labour must be reported immediately to the designated authorities within the company. We will promptly investigate such reports and take appropriate actions.

5.4.2. Remediation: In cases where child labour is identified within our operations, we will take immediate corrective actions to address the situation, including providing appropriate support to affected children.

5.5 Communication and Training

5.5.1. Internal Communication: This Child Labor Policy will be communicated to all employees and stakeholders, emphasizing their responsibility to comply with the policy's provisions and report any concerns or violations.

5.5.2. Training: Regular training programs will be conducted to raise awareness about child labor, its consequences, and the company's commitment to combating it.

5.6 Engagement and Collaboration

Zyeta recognizes the importance of collaboration in promoting ethical labor practices. We will actively engage with industry bodies, NGOs, and other stakeholders to help drive progress in eradicating child labor, forced labor, and human trafficking. Through partnerships, knowledge sharing, and participation in industry initiatives, Zyeta will contribute to the global movement for better labor practices. By collaborating with experts and organizations, we will continually improve our own practices and encourage others to take responsibility for ensuring fair and humane working conditions across all sectors of the global economy.

5.7 Eradication of Forced Labor

Zyeta unequivocally condemns all forms of forced or compulsory labor, including bonded labor, involuntary overtime, and exploitative working conditions. Our commitment is to ensure that all employment relationships, both within Zyeta and throughout our supply chain, are voluntary, and employees have the freedom to terminate their employment at any time. To prevent and detect forced labor, Zyeta will conduct regular audits to identify and address potential risks. We take swift corrective actions in the event of any violations, reinforcing our commitment to maintaining a workplace free from exploitation and upholding the dignity of all workers.

5.8 Prevention of Human Trafficking

Zyeta strictly prohibits human trafficking in any form and will not tolerate activities that support or facilitate trafficking. To combat this serious issue, we will collaborate with local authorities, non-governmental organizations (NGOs), and other stakeholders in regions where we operate. We will also ensure that employees and contractors are trained to identify and respond to the signs of human trafficking. Through education and vigilance, Zyeta aims to prevent trafficking and contribute to the broader global effort to eliminate this crime while safeguarding human rights in our operations and supply chain.

5.9 Supply Chain Management

Zyeta is dedicated to upholding human rights within its supply chain. We will integrate human rights criteria into our supplier selection and evaluation processes to ensure that all partners adhere to our ethical standards. Contracts with suppliers and contractors will explicitly require compliance with our anti-child labor, anti-forced labor, and anti-human trafficking policies. Any supplier found in violation of these policies will face corrective actions, which may include termination of the business relationship. Zyeta is committed to ensuring that all parties in our supply chain maintain fair and responsible labor practices that respect human dignity.

5.10 Prevention of Child Labor

Zyeta is committed to preventing child labor by strictly prohibiting the employment of individuals below the legal working age, as determined by applicable laws and regulations. To ensure compliance, Zyeta will implement comprehensive age verification procedures during the recruitment process. We will also conduct awareness programs and training sessions to educate employees and stakeholders about the importance of preventing child labor and the negative impact it has on society. Zyeta’s approach prioritizes the welfare and rights of children, ensuring that no child is subjected to any form of labor within our operations or supply chain.

5.11 Reporting and Accountability

Zyeta will establish a confidential, accessible reporting mechanism for employees and stakeholders to report any violations of our labor policies. This system will ensure that concerns are addressed promptly and thoroughly, with appropriate corrective actions taken where necessary. To protect the integrity of the reporting process, we will guarantee that whistleblowers are shielded from retaliation, fostering a safe environment for reporting unethical practices. Transparency and accountability are central to our approach, as we are committed to addressing all incidents with fairness and integrity, upholding our commitment to human rights.

6. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Prohibited Activities	Ensure zero tolerance for child labor, forced labor, and human trafficking	Number of violations reported	0(→)
2	Prevention and Due Diligence	Strengthen due diligence in supply chain and project sites	Percentage of suppliers screened for compliance	100%(→)
3	Remediation and Reporting	Establish effective remediation mechanisms for reported cases	Percentage of resolved cases	100%(→)

4	Communication and Training	Enhance awareness through training and communication programs	Percentage of employees and stakeholders trained	100%(→)
5	Engagement and Collaboration	Increase engagement with stakeholders on labor practices	Number of collaborations with NGOs and government bodies (Count)	2 collaborations (↑)
6	Eradication of Forced Labor	Eliminate forced labor	Number of forced labor cases reported (Count)	0 cases (→)
7	Prevention of Human Trafficking	Prevent human trafficking	Number of human trafficking cases reported (Count)	0 cases (→)
8	Supply Chain Management	Ensure supply chain is free from child/forced labor and trafficking	Percentage of suppliers audited for compliance (Percentage)	100% suppliers (→)
9	Prevention of Child Labor	Eliminate child labor in operations	Number of child labor incidents reported (Count)	0 incidents (→)
10	Reporting and Accountability	Improve reporting and accountability	Number of reports on labor practices (Count)	12 reports (→)

7. Disciplinary Action for Policy Violations

Employees, contractors, or suppliers found in violation of this policy will face strict disciplinary measures to maintain the integrity of Zyeta’s operations. These actions may include termination of employment or the business relationship, depending on the severity of the violation. In cases where required, Zyeta will report the violation to the appropriate legal or regulatory authorities to ensure compliance with local and international laws. Additionally, individuals or organizations found in violation may be required to implement corrective action plans and undergo mandatory training to prevent future incidents. ZYETA is committed to holding all parties accountable to the highest ethical standards.

8. Distribution

Zyeta is committed to ensuring that this policy is effectively communicated to all employees, contractors, suppliers, and stakeholders. The policy will be distributed through various internal communication channels, including training sessions, onboarding materials, and employee handbooks. This approach will ensure that everyone involved in Zyeta's operations is aware of the expectations regarding child labor, forced labor, and human trafficking. Regular communication and updates will be provided to reinforce the importance of these issues, ensuring that all parties understand their roles and responsibilities in upholding these ethical standards across our operations and supply chain.

9. Annual Review

To ensure the policy remains relevant and effective, Zyeta's Sustainability Team will conduct an annual review of this policy. This review will assess the policy's alignment with current legal and regulatory requirements, as well as its effectiveness in addressing emerging risks or challenges related to child labor, forced labor, and human trafficking. If necessary, the policy will be updated to address new risks, changes in laws, or best practices. This process ensures that Zyeta's commitment to ethical practices is continuously strengthened, and that we remain proactive in safeguarding human rights within our operations.

Compliance Monitoring: We will establish monitoring mechanisms to ensure compliance with this policy and periodically assess its effectiveness.

Policy Review: This Child Labor Policy will be reviewed periodically and updated as necessary to align with changes in legislation, industry best practices, and the evolving understanding of child labour issues. By accepting this policy, employees, contractors, suppliers, and stakeholders acknowledge their understanding and commitment to comply with its provisions.

10. Conclusion

Zyeta is committed to fostering a work environment that upholds human dignity and respects the rights of all individuals. By implementing this policy, we aim to set a strong example in the fight against child labor, forced labor, and human trafficking. Our approach centers on collaboration, accountability, and continuous improvement to ensure ethical practices throughout our business operations. Through proactive measures, education, and partnerships, we strive to make a meaningful impact, not only within Zyeta but also across our supply chain and industry. Our goal is to create a positive, lasting change that supports human rights globally

DIVERSE INCLUSION PRACTICES

ZYETA/ESG/P-04

1. Introduction

At Zyeta, we believe that a strong organization thrives on an inclusive, diverse, and equitable work environment. This policy underscores our commitment to promoting diversity, equity, and inclusion (DEI) across all levels of our organization. By utilizing Building Information Modeling (BIM) in our design and project management services, we aim to foster creativity, innovation, and sustainability. DEI principles shape our interactions within the team, as well as with clients, suppliers, and stakeholders. We are dedicated to providing equal opportunities for all individuals, ensuring that everyone, regardless of their background or identity, feels valued and has the chance to succeed.

2. Scope of Application

2.1 Who: This policy applies to all employees, contractors, consultants, business partners, and stakeholders associated with Zyeta.

2.2 Business Area or Operation Covered: All departments, projects, and operations involving design consultation and project management services using Building Information Modeling (BIM).

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Leadership and Management

- Ensure resources are allocated to DEI initiatives.
- Lead by example in promoting diversity and inclusion in every aspect of business.
- Monitor and evaluate progress toward DEI goals and objectives.

3.2 Human Resources (HR)

- Ensure equitable hiring practices and diverse recruitment pipelines.
- Offer training programs on anti-discrimination, cultural competency, and inclusive leadership.

- Address grievances related to discrimination, harassment, and exclusion in a timely and sensitive manner.

3.3 Employees and Contractors

- All employees and contractors must adhere to this DEI policy and promote an inclusive, respectful work environment.
- They are responsible for reporting any instances of discrimination, harassment, or exclusion they witness or experience.
- Active participation in fostering an inclusive culture is expected from everyone at Zyeta.

3.4 DEI Committee (if applicable)

- The DEI Committee will review the policy's implementation and recommend improvements.
- It will provide a platform for discussing DEI-related concerns and addressing issues.
- The committee will be composed of employees from various functions and levels within the organization.

4. Application of the Policy

This policy applies to all employment decisions, workplace interactions, client engagements, and external partnerships. It governs recruitment, promotions, training, compensation, and overall work culture.

5. Governance of this Policy

The governance of this policy lies with Zyeta's Senior Management Team, in collaboration with the Human Resources (HR) Department, and the Diversity, Equity, and Inclusion (DEI) Committee. The DEI Committee will be responsible for overseeing the implementation and effectiveness of this policy, providing guidance on DEI-related initiatives, and ensuring that Zyeta's DEI goals are integrated into the company's culture and strategic priorities. Senior management will be responsible for allocating the necessary resources to support DEI programs and initiatives across the organization.

6. Diversity, equity, and inclusion Policy

6.1 Recovery Support Framework

Zyeta has a clear remediation process to support victims of discrimination or harassment, offering appropriate and proportional responses to the violation. In line with Indian labor laws, we ensure transparency in the process and monitor the effectiveness of the remediation efforts. The goal is to restore fairness, mitigate harm, and prevent recurrence.

6.2 Non-Discrimination

Zyeta is committed to maintaining a workplace free from discrimination, harassment, or exclusion of any kind. Discrimination based on race, gender, gender identity, sexual orientation, ethnicity, religion, disability, age, or any other protected characteristic will not be tolerated in any aspect of employment, including hiring, promotion, or treatment of employees. We are dedicated to ensuring equal treatment for all individuals and fostering a culture of respect and fairness. Zyeta values diversity and inclusion and strives to create an environment where every employee can thrive and contribute without fear of discrimination or bias.

6.3 Harassment-Free Workplace

Zyeta is committed to maintaining a workplace free from all forms of harassment, including physical, psychological, and verbal abuse. Any form of harassment, such as bullying, inappropriate behavior, or offensive language, will be addressed immediately and effectively. We have clear policies in place to ensure that all employees can work in an environment where respect and dignity are upheld. Zyeta encourages employees to report any incidents of harassment and guarantees that all concerns will be handled promptly, ensuring a safe and supportive environment for everyone in the organization.

6.4 Fair Career Advancement

At Zyeta, we prioritize creating a diverse and inclusive workforce. Our recruitment and career development practices are intentionally designed to ensure equal opportunities for all individuals, regardless of their background. We actively seek to hire individuals from various demographic groups to reflect the diversity of our community and foster innovation. Additionally, we provide fair and equitable opportunities for career advancement and progression, ensuring that every employee has access to growth opportunities based on their skills and performance, not their identity or background.

6.5 Inclusive Leadership

Inclusive leadership is a core value at Zyeta. We expect our leaders to model inclusive behaviors by fostering diverse teams, ensuring all voices are heard, and promoting an environment of mutual respect. Inclusive leadership will be a key focus in training programs, performance appraisals, and leadership development initiatives. Leaders will be held accountable for creating an inclusive culture where diversity is celebrated, and every team member has the opportunity to contribute and grow. Zyeta's leadership strives to inspire collaboration and innovation while embracing the unique perspectives of all individuals within the organization.

6.6 Accessibility

Zyeta is dedicated to ensuring that individuals with disabilities have equal access to the workplace. We will make reasonable accommodations to support employees in performing their roles, including modifying workspaces, providing assistive technologies, and offering necessary support. Our goal is to ensure that all employees, regardless of their physical or mental abilities, can fully participate in and contribute to the workplace. Zyeta will continually assess and improve accessibility measures to create an inclusive environment where employees with disabilities can thrive and feel valued as part of our team.

6.7 Wage Equity Disparity

Zyeta actively monitors and audits remuneration practices to ensure wage equality and address any pay gaps. In compliance with the Equal Remuneration Act, 1976, we analyze compensation data to identify and correct disparities, ensuring that all employees receive fair pay for equal work, regardless of gender, race, or other factors.

6.8 Gender Pay Gap and Wage Inequality

Zyeta is committed to achieving equal pay for equal work, irrespective of gender. We recognize the risk of potential wage disparities, particularly in industries with low unionization rates, and are dedicated to addressing these issues proactively. To ensure fairness, we will conduct regular internal salary audits to identify and rectify any wage gaps. This policy reflects our dedication to fostering a fair, equitable workplace where all employees are compensated based on their contributions and responsibilities. Zyeta is committed to maintaining transparency and accountability in our pay structures to ensure an inclusive and just work environment for all.

6.9 Workplace Discrimination Concerns

Zyeta prioritizes a non-discriminatory hiring and promotion process, focusing on qualifications, experience, and performance. We acknowledge the risk of unconscious bias affecting these processes, potentially leading to an underrepresented and non-diverse workforce. To prevent this, we are committed to ensuring that all recruitment and promotion decisions are made fairly. Anti-discrimination training will be provided to employees involved in recruitment and promotions to raise awareness and encourage impartial decision-making. This policy helps to ensure that Zyeta continues to foster an equitable environment where all individuals have equal opportunities to succeed based on merit.

6.10 Cultural Competency Training

Zyeta provides mandatory training programs to all employees to foster an inclusive work environment and prevent discrimination or harassment. These training programs help employees understand diversity, equity, and inclusion (DEI) principles and promote a respectful workplace. Our training is in compliance with the Sexual Harassment of Women at Workplace Act, 2013, and other relevant laws, creating a more equitable and supportive workplace for all employees.

6.11 Diversity Policy Deficiency

Zyeta recognizes that without clear diversity and inclusion (D&I) policies, the company may face challenges in attracting and retaining diverse talent, which can hinder creativity, innovation, and competitiveness. We are committed to implementing comprehensive D&I policies that promote diversity across all levels of the organization. This includes proactive recruitment strategies, mentoring programs, and a commitment to creating an inclusive culture where all employees feel valued. Zyeta believes that diverse teams bring unique perspectives and innovative solutions, which drive the company's success and strengthen our global position in the marketplace.

6.12 Fair Development Opportunities

Zyeta ensures equal opportunities for professional development and promotion, regardless of gender, race, or any other characteristic. We provide regular training to HR teams to avoid biases in career advancement decisions and to increase accessibility for all employees. Our promotion policies focus on merit and provide equal access to training and leadership development programs for all employees, in line with the Indian Equal Remuneration Act, 1976.

6.13 Cultural and Social Integration Issues

Zyeta is dedicated to fostering cultural and social integration within the workplace by promoting collaboration and understanding across diverse backgrounds. We understand that employees from different cultural, social or gender backgrounds may face integration challenges that can impact team cohesion. To address this, Zyeta will support employee-led cultural and gender associations, encouraging professional networking and cross-cultural learning. These initiatives aim to build stronger connections between employees and foster an environment of mutual respect and inclusivity, enhancing both personal and professional relationships while creating a more cohesive and unified workforce.

6.14 Fair Recruitment Strategies

Zyeta is committed to an open, transparent, and merit-based recruitment process that ensures equal opportunities for all candidates. We adhere to the Equal Remuneration Act, 1976, and the Disabilities Act, 1995 to prevent discriminatory hiring practices based on gender, race, age, disability, or any other protected characteristic. Our recruitment policies promote diversity by providing equal access to all job applicants, both internal and external, ensuring a fair selection process based on qualifications and experience.

Zyeta is committed to an open, transparent, and merit-based recruitment process that ensures equal opportunities for all candidates. We adhere to the Equal Remuneration Act, 1976, and the Disabilities Act, 1995 to prevent discriminatory hiring practices based on gender, race, age, disability, or any other protected characteristic. Our recruitment policies promote diversity by providing equal access to all job applicants, both internal and external, ensuring a fair selection process based on qualifications and experience.

6.15 Equality Enforcement Gap

Zyeta is fully committed to complying with all local and international anti-discrimination laws and upholding the highest ethical standards in our operations. However, we recognize that variations in enforcement of these laws across regions may pose risks. To mitigate this, Zyeta's internal policies will exceed legal requirements to actively promote diversity, equity, and inclusion. We will ensure consistent enforcement of these policies globally, addressing any gaps in local legislation enforcement. This proactive approach will help protect our employees from discrimination, ensuring that Zyeta remains a leader in ethical conduct and fostering an inclusive workplace across all regions.

6.16 Workplace Safety Measures

Zyeta has established specific measures to prevent workplace harassment, separate from grievance mechanisms. We have formed an anti-harassment committee, conduct internal audits to monitor harassment cases, and foster open dialogue about harassment prevention. Our policies are in compliance with the Sexual Harassment of Women at Workplace Act, 2013 and aim to create a safe and respectful environment for all employees.

6.17 Inadequate Whistle-Blowing Mechanisms

Zyeta is committed to providing a safe and transparent environment for employees to report any concerns related to discrimination, harassment, or policy violations. We recognize the risk of insufficient whistle-blowing mechanisms leading to a lack of accountability. To address this, Zyeta will establish a robust, confidential whistle-blowing system that ensures employees feel safe when raising concerns. All reports will be thoroughly investigated, with appropriate corrective actions taken. By offering this mechanism, Zyeta aims to maintain a workplace where transparency, fairness, and respect are prioritized, and all employees are empowered to speak out against injustices.

6.18 Career Growth Inequality

Zyeta is committed to offering equal career development opportunities to all employees, regardless of gender, race, or background. We recognize the risk that underrepresented groups may not have the same access to training, mentorship, or leadership roles, potentially affecting employee retention and career growth. To combat this, Zyeta will ensure that career development resources are available to all employees, fostering an environment of equal opportunity. Our commitment includes providing mentorship programs and leadership training, helping all individuals reach their full potential. By doing so, we strive to build a diverse leadership pipeline and improve overall employee satisfaction.

6.19 Equitable Employment Practices

Zyeta is committed to creating an inclusive workplace for employees with disabilities. We provide accessible infrastructure and offer specific training programs for psychological and physical adaptation. In line with the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995, we strive to ensure that employees with disabilities can perform their job duties effectively and feel included in all company activities.

6.20 Insufficient Training for Managers

Zyeta acknowledges that without adequate training, managers may unintentionally make biased decisions, particularly in recruitment, promotions, and day-to-day interactions. To prevent this, we will provide ongoing diversity, equity, and inclusion (DEI) training to all managers with decision-making authority. These programs will raise awareness of unconscious bias and its impact on workplace dynamics, helping managers make fair, objective decisions that contribute to a more inclusive environment. By equipping our leadership with the tools to foster inclusivity, Zyeta aims to create a positive workplace culture where all employees feel valued and respected.

6.21 Women’s Empowerment Programs

Zyeta has implemented targeted mentorship and sponsorship programs to support the professional development of women in the workplace. These programs provide female employees with the resources, guidance, and opportunities needed to advance in their careers. Our initiatives align with the Equal Remuneration Act, 1976, and other relevant laws to support gender equality in leadership roles.

6.22 Harassment Complaint Process

Zyeta has established a grievance mechanism to address complaints related to discrimination and harassment. We ensure the system is accessible to all employees, including those facing language or geographical barriers. In accordance with the Sexual Harassment of Women at Workplace Act, 2013, and other relevant regulations, the mechanism ensures confidentiality and protection against retaliation for those who report issues.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Recovery Support Framework	Provide support to Recovery Support Framework of harassment or discrimination.	Percentage of affected individuals receiving full support	100% (→)
2	Harassment-Free Workplace	Create a harassment-free work environment.	Percentage of employees aware of anti-harassment policies	100% (→)

3	Fair Career Advancement	Ensure fair hiring and career advancement opportunities.	Percentage of fair hiring decisions and career progression	100% (→)
4	Inclusive Leadership	Promote diverse leadership at all levels.	Percentage of leadership roles filled by underrepresented groups	30% (↑)
5	Accessibility	Ensure workplace accessibility for all employees.	Percentage of accessible facilities and tools	100% (→)
6	Wage Equity Disparity	Ensure equal wages for equal work across all employees.	Percentage of wage equality between genders and across roles	0% (→)
7	Gender Pay Gap and Wage Inequality	Close the gender pay gap and address wage inequality.	Percentage of wage gap closed by gender	0% (→)
8	Workplace Discrimination Concerns	Eliminate bias in hiring and promotions.	Percentage of bias-free recruitment and promotions	100% (→)
9	Cultural Competency Training	Promote cultural competency among employees.	Percentage of employees trained in cultural competency	100% (→)
10	Diversity Policy Deficiency	Introduce formal diversity and inclusion policies.	Percentage of employees covered by diversity and inclusion policies	100% (→)
11	Fair Development Opportunities	Ensure fair development opportunities for all employees.	Percentage of equal development opportunities provided	95% (↑)
12	Cultural and Social Integration Issues	Promote cultural and social integration among employees.	Percentage of employees participating in cultural competency workshops	100% (→)
13	Fair Recruitment Strategies	Ensure fairness in recruitment processes.	Percentage of recruitment strategies considered fair and unbiased	100% (→)
14	Equality Enforcement Gap	Strengthen enforcement of anti-discrimination laws.	Percentage of compliance with anti-discrimination laws	100% (→)

15	Workplace Safety Measures	Ensure a safe work environment for all employees.	Percentage of safety compliance and employee safety training completion	100% (→)
16	Inadequate Whistle-Blowing Mechanisms	Establish effective whistle-blowing mechanisms.	Percentage of employees aware of whistle-blowing process	100% (→)
17	Career Growth Inequality	Ensure equal access to career development opportunities.	Percentage of employees with equal development access	95% (↑)
18	Equitable Employment Practices	Ensure equitable treatment of all employees.	Percentage of equity in employment practices (compensation, recognition, promotions)	100% (→)
19	Insufficient Training for Managers	Train all managers in inclusion and diversity practices.	Percentage of managers trained in inclusion and diversity	100% (→)
20	Women's Empowerment Programs	Empower women in the workplace.	Percentage of women in leadership or empowerment programs	75% (↑)
21	Harassment Complaint Process	Provide an effective process for harassment complaints.	Percentage of complaints addressed and resolved in line with policies	100% (→)

8. Disciplinary Action for Policy Violations

Any employee found violating Zyeta's DEI policy through discriminatory practices, harassment, or abuse will face disciplinary action, which may include formal warnings, suspension, or, in severe cases, termination of employment. Zyeta is committed to addressing all allegations of discrimination, harassment, or abuse in a prompt, confidential, and fair manner. Each allegation will be thoroughly investigated, ensuring a thorough and unbiased process. Based on the findings, appropriate corrective actions will be taken to maintain a safe, respectful, and inclusive work environment. Zyeta holds all employees accountable to the highest standards of behavior and ethical conduct.

9. Distribution

Zyeta is committed to ensuring that all employees, contractors, and relevant stakeholders are fully aware of this policy. The policy will be distributed through various channels, including email, internal communication platforms, and the company intranet for easy access. It will also be incorporated into the employee onboarding process to ensure that new hires understand the company's commitment to diversity, equity, and inclusion (DEI) from the outset. Regular reminders will be communicated during company meetings and included in newsletters to reinforce the policy's objectives, ensuring that all employees remain engaged and aligned with Zyeta's DEI goals.

10. Annual Review

Zyeta is dedicated to continuously improving its diversity, equity, and inclusion (DEI) efforts. To ensure the policy remains effective and relevant, it will undergo an annual review. This review will evaluate the company's progress toward meeting quantitative DEI objectives, gather feedback from employees about the inclusivity of the workplace, and identify any areas for improvement. The DEI committee, in collaboration with the HR team, will lead the review process, ensuring that updates or revisions are made based on employee input and changing organizational needs. All updates will be communicated to employees, ensuring ongoing engagement with DEI efforts.

11. Conclusion

At Zyeta, we are committed to fostering a diverse, equitable, and inclusive workplace that values the unique qualities of each individual. Our DEI policy underscores our dedication to creating an environment where every employee feels respected, supported, and empowered to reach their full potential. By embracing inclusivity, we aim to enhance our organizational culture, drive innovation, and ensure that all employees have equal opportunities for growth. This approach not only strengthens our internal environment but also positions Zyeta as a forward-thinking company that attracts top talent and cultivates meaningful relationships with clients and stakeholders.

EXTERNAL STAKEHOLDER HUMAN RIGHTS POLICY ZYETA/ESG/P-05

1. Introduction

At Zyeta, we are committed to upholding human rights and ensuring our operations, business relationships, and engagements with external stakeholders are conducted with integrity, fairness, and respect for human dignity. As a provider of Design Consultation and Project Management Services through Building Information Modeling (BIM), and integrating Sustainability Management Systems, we acknowledge our responsibility to respect, promote, and support the human rights of all individuals and communities affected by our operations. This commitment extends beyond our employees to include external stakeholders such as clients, contractors, suppliers, and local communities, setting clear expectations for all parties involved in our business activities.

2. Scope of Application

2.1 Who: This policy applies to all external stakeholders, including clients, suppliers, contractors, partners, and community members.

2.2 Business Area or Operation Covered: All design consultation and project management services utilizing Building Information Modeling (BIM).

2.3 Geographical Area Covered: It covers all the branches

3. Roles and Responsibilities

3.1 Management

- Senior management is responsible for implementing the human rights policy and setting strategic objectives.
- They ensure the integration of human rights considerations across all aspects of the business.
- Management provides training and resources to support policy compliance throughout the organization.

3.2 Human Resources Department

- HR is responsible for educating and training employees on human rights principles.
- They facilitate communication between internal teams and external stakeholders on human rights issues.

- HR ensures that the workforce is aligned with Zyeta’s commitment to human rights.

3.3 Project Managers and Department Heads

- Project managers and department heads ensure human rights are integrated into every project.
- They oversee procurement, contractor selection, and project implementation to uphold human rights standards.
- They address any concerns raised by external stakeholders regarding human rights.

3.4 External Stakeholders (Clients, Suppliers, Contractors)

- External stakeholders must align with Zyeta’s human rights policy and adhere to local and international standards.
- They are expected to respect labor rights, non-discrimination, and ethical conduct in their operations.
- ZYETA requires compliance with human rights standards from all clients, suppliers, and contractors.

4. Application of the Policy

This policy is applied in vendor and supplier selection processes to ensure ethical sourcing and responsible business relationships. It is integrated into contractual agreements with partners and stakeholders to uphold human rights commitments. Additionally, it guides community engagement and social responsibility initiatives to foster inclusive and sustainable development. Furthermore, it governs project management and execution to prevent human rights violations, ensuring that all operations align with global human rights standards.

5. Governance of this Policy

The governance of this policy lies with Zyeta’s Senior Management Team, in collaboration with the ESG Committee, Legal and Compliance Team, and the Procurement and Operations Teams. The policy’s implementation, monitoring, and effectiveness will be overseen by the ESG Committee, which will report progress to senior management. The Senior Management Team is responsible for ensuring the company’s adherence to human rights principles in dealings with external stakeholders.

6. External stakeholder human rights Policy

6.1 Health and Safety

Zyeta prioritizes the health, safety, and well-being of all external stakeholders involved in its projects. We are committed to providing safe working environments by ensuring that all employees and contractors are equipped with the necessary protective equipment and resources to prevent accidents and health hazards. Our commitment extends to conducting regular risk assessments, providing appropriate training, and implementing safety protocols to address potential risks. Zyeta continuously works to create a workplace culture where safety is a top priority, aiming to mitigate any factors that could negatively affect the health and safety of individuals on our projects.

6.2 Non-Discrimination

Zyeta is dedicated to providing an inclusive and equitable environment for all stakeholders, prohibiting any form of discrimination based on race, gender, religion, sexual orientation, disability, age, nationality, or any other characteristic. We uphold the principle of fairness and equality in all our dealings, ensuring that every individual involved in our projects is treated with respect and dignity. Discriminatory practices will not be tolerated, and we are committed to promoting a culture of inclusion and respect in every aspect of our operations. Zyeta strives to foster a work environment where all stakeholders feel valued and appreciated.

6.3 Right to Privacy and Data Protection

Zyeta respects the right to privacy of all external stakeholders and is dedicated to protecting their personal data. We ensure that all personal information is collected, processed, and stored in strict compliance with applicable privacy laws and data protection regulations. Zyeta implements robust security measures to protect sensitive data from unauthorized access, loss, or misuse. We are committed to transparency in how personal data is used, providing stakeholders with the information they need to understand how their data is handled. Our data protection policies reinforce our respect for individual privacy and legal compliance in all our business operations.

6.4 Community Impact

Zyeta recognizes the importance of fostering positive relationships with local communities and is committed to minimizing any adverse impacts of our operations. We engage in proactive community consultation to understand local concerns and address any potential negative effects our projects might have on the surrounding areas.

Zyeta prioritizes environmental and social responsibility in our decision-making processes, ensuring that the welfare of local populations is considered in every phase of project planning and execution. We strive to be a responsible corporate citizen, making efforts to positively contribute to the well-being of the communities in which we operate.

6.5 Labor Rights and Fair Treatment

Zyeta is committed to safeguarding the labor rights of all external stakeholders engaged in its projects, ensuring fair wages, safe working conditions, and the right to organize. We adhere to local labor laws as well as international labor standards, including the prohibition of forced and child labor. Zyeta ensures that all workers are treated with respect and fairness, and we continuously monitor our supply chains and contractors to maintain these standards. By ensuring compliance with these labor rights, we foster ethical business practices and contribute to the well-being of the workers involved in our operations.

6.6 Engagement and Grievance Mechanisms

Zyeta is committed to ensuring that all external stakeholders have access to transparent and accessible grievance mechanisms to raise concerns or report violations of human rights. We provide various channels through which stakeholders can submit complaints, ensuring that their voices are heard and that concerns are addressed in a timely and effective manner. All grievances are taken seriously, and Zyeta investigates each matter thoroughly to identify solutions and take appropriate corrective actions. This commitment helps maintain trust with our stakeholders and demonstrates our dedication to fair and ethical business practices.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025- March 2026
1	Health and Safety	Promote the health and safety of external stakeholders involved in projects.	Percentage of external contractors with health and safety certifications	100% (→)

2	Non-Discrimination	Ensure non-discriminatory practices with all external stakeholders.	Percentage of contracts and partnerships with non-discriminatory clauses	100% (→)
3	Right to Privacy and Data Protection	Protect the privacy and data of all external stakeholders involved in projects.	Percentage of data protection compliance audits conducted	100% (→)
4	Community Impact	Minimize negative impact on communities and contribute positively.	Number of community impact assessments conducted per project	1/ year (↑)
5	Labor Rights and Fair Treatment	Ensure labor rights are respected and fair treatment is provided to external workers.	Percentage of external partners with verified labor rights compliance	100% (→)
6	Engagement and Grievance Mechanisms	Ensure transparent engagement and effective grievance mechanisms.	Percentage of stakeholders with access to grievance mechanisms	100%(→)

8. Disciplinary Action for Policy Violations

Any violation of this policy, whether by Zyeta employees or external stakeholders, will be treated with the utmost seriousness. Disciplinary actions will be determined based on the nature and severity of the violation. For Zyeta employees, this may include reprimands, suspension, or termination of employment. Contractors, suppliers, or clients found in violation may face termination of contracts, removal from the supplier list, or legal action if necessary. Zyeta reserves the right to suspend or end engagement with external stakeholders in cases of severe violations, such as forced labor, child labor, discrimination, or breaches of workplace safety standards.

9. Distribution

This policy will be distributed to all relevant internal and external stakeholders, ensuring broad awareness and understanding. Employees, contractors, suppliers, and clients will receive direct communication regarding the policy, including its inclusion in onboarding and induction processes for new external partners. Additionally, the policy will be readily available on Zyeta’s website, ensuring it is accessible to all stakeholders at any time. By providing multiple channels of distribution, Zyeta ensures that all parties involved are informed and held accountable to the standards outlined in this policy, reinforcing our commitment to ethical practices and human rights.

10. Annual Review

To ensure the policy remains relevant and effective, Zyeta will conduct an annual review led by senior management and the Human Resources Department. This review will focus on any changes to local or international human rights legislation, as well as lessons learned from grievances or issues raised throughout the year. The review process will also evaluate the policy’s effectiveness and impact on stakeholders, identifying areas for improvement. Updates will be made where necessary to ensure compliance with legal standards and enhance the policy’s impact, with any significant changes communicated to all stakeholders.

11. Conclusion

Zyeta’s commitment to respecting and promoting human rights is central to our values and business operations. This policy provides a comprehensive framework to ensure all external stakeholders, including clients, contractors, and suppliers, are treated with fairness, dignity, and respect. We are dedicated to continuously improving our practices, addressing issues as they arise, and creating a positive, equitable impact on all parties involved in our projects. By adhering to these principles, we aim to contribute to sustainable development and foster the long-term success of both our business and the communities in which we operate, reinforcing our ethical responsibility.

DISCRIMINATION HARASSMENT PROCESS POLICY ZYETA/ESG/P-06

1. Introduction

At Zyeta, we are committed to maintaining an inclusive, respectful, and safe environment for all our employees, clients, and partners. Discrimination and harassment of any form undermine the core values of our company and are strictly prohibited. We strive to create an environment where every individual is treated with dignity and respect, fostering diversity, equity, and inclusion within our workforce.

As a company offering Design Consultation & Project Management Services through Building Information Modeling (BIM), we recognize that our commitment to a harassment-free and discriminatory-free workplace is integral to our long-term success. Our Grievance Mechanism on Discrimination and Harassment is designed to offer a clear process for reporting, investigating, and resolving complaints. This policy outlines the procedures to address any instances of discrimination and harassment that may occur within our operations.

2. Scope of Application

2.1 Who: This policy applies to all employees, contractors, vendors, clients, and visitors associated with Zyeta.

2.2 Business Area or Operations Covered: The policy is applicable to all departments, projects, and engagements undertaken by Zyeta, including design consultation and project management services.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Senior Management

- Senior leadership is responsible for overseeing the effective implementation of the grievance mechanism.
- They ensure proper resources are allocated for its operation and manage high-level complaints.
- Senior management ensures corrective action is taken where necessary and monitors the overall grievance process.

3.2 Human Resources (HR) Department

- HR administers the grievance mechanism, including receiving, investigating, and maintaining records of complaints.
- They ensure the grievance process complies with this policy and provide training to employees on the process.
- HR plays a key role in ensuring the process is transparent and unbiased in handling complaints.

3.3 Managers and Supervisors

- Managers and supervisors promote a workplace culture of respect and inclusivity, fostering open communication.
- They serve as the first point of contact for grievances and refer unresolved issues to HR.
- Managers ensure there is no retaliation against complainants and support a fair grievance process.

3.4 External Stakeholders (Clients, Contractors, Suppliers)

- External stakeholders must respect Zyeta's grievance policy and utilize provided channels to report concerns.
- They are expected to report any grievances related to discrimination, harassment, or unethical behavior.
- External parties must adhere to the grievance process to ensure transparency and accountability in projects.

4. Application of the Policy

The purpose of this Grievance Policy is to provide a fair and transparent process to all the employees of Zyeta to raise concerns, complaints, or grievances related to their employment. It is designed to ensure that all grievances are addressed promptly, objectively, and in a confidential manner

5. Governance of this Policy

The governance of this policy will be overseen by Zyeta's Senior Management Team, in collaboration with the Human Resources (HR) Department, Legal and Compliance Team, and the Diversity, Equity, and Inclusion (DEI) Committee.

These groups will ensure the effective implementation of the policy, monitor compliance, and provide guidance on any complex issues related to discrimination or harassment.

6. Discrimination harassment process Policy

6.1 Confidentiality

All grievances raised under this policy will be treated with the utmost confidentiality to the extent possible. Only those individuals directly involved in the investigation and resolution of the grievance will have access to the information shared during the process. Zyeta upholds the highest standards of confidentiality throughout the grievance process. All personal and sensitive information related to grievances will be handled with discretion. The identities of complainants, respondents, and witnesses will be disclosed only to those directly involved in the investigation or resolution, on a need-to-know basis. All grievance-related records and documents will be securely stored and accessible solely to authorized personnel. If a complainant wishes to remain anonymous, Zyeta will honor that request while explaining any potential limitations in fully investigating or resolving the issue, ensuring privacy and protection for all parties.

6.2 Informal Resolution

Employees are encouraged to attempt an informal resolution of their grievance before initiating the formal grievance procedure. Employees may discuss their concerns with their immediate supervisor or any member of the management team in an effort to reach a resolution.

6.3 Formal Grievance Procedure

If the employee is unable to resolve the grievance informally or if the nature of the grievance is such that it requires a formal process, the employee should follow these steps:

Step 1: Written Complaint - The employee must submit a written complaint outlining the details of the grievance, including the nature of the issue, individuals involved, relevant dates, and any supporting documentation. The complaint should be submitted to the HR department

Step 2: Investigation - Upon receipt of the written complaint, Zyeta will promptly initiate an investigation. The investigation will be conducted by an impartial person or committee who will gather all relevant information, interview relevant parties, and review any supporting evidence.

Step 3: Decision and Resolution - Based on the findings of the investigation, a decision will be made regarding the grievance. Zyeta will communicate the decision in writing to the employee, outlining the reasons for the decision and any actions to be taken to resolve the grievance.

Step 4: Appeal - If the employee is dissatisfied with the decision, they may appeal within a specified timeframe (as determined by Zyeta) by submitting a written appeal to a designated authority. The appeal will be reviewed, and a final decision will be communicated to the employee.

6.4 Protection against Retaliation

Zyeta prohibits retaliation against any employee who raises a grievance in good faith, Any form of retaliation against an employee for raising a grievance will be treated as a serious violation of company policy and may result in disciplinary action.

6.5 Timeframe

Zyeta is committed to resolving grievances in a timely manner. Every effort will be made to complete the investigation and reach a decision within a reasonable timeframe. However, the timeframe may vary depending on the complexity and nature of the grievance.

6.6 Documentation

All documentation related to the grievance, including the written complaint, investigation findings, and decisions, will be maintained confidentially.

6.7 External Remedies

If an employee is not satisfied with the outcome of the internal grievance procedure, they may seek external remedies, such as filing a complaint with the appropriate labour or employment authorities as per the applicable laws.

6.8 Non-Retaliation

Zyeta is dedicated to protecting individuals from any form of retaliation for reporting grievances related to discrimination or harassment. No employee will face job insecurity, such as demotion, termination, or harassment, for filing a grievance in good faith. Additionally, no disciplinary actions will be taken against the complainant or any witnesses. All parties involved in the grievance process—complainants, respondents, and witnesses—are guaranteed protection from retaliation. If any retaliation is reported, it will be treated as a serious violation of this policy and will be investigated and addressed promptly to ensure a safe environment.

6.9 Accessibility

Zyeta ensures that all stakeholders are fully aware of the grievance reporting mechanisms available to them. Clear instructions on how to report grievances will be included in onboarding materials, employee handbooks, project documentation, and on Zyeta’s website. Grievances can be submitted through various accessible channels such as email, telephone hotline, in-person visits to HR or a grievance officer, and a secure online portal for anonymous submissions. Zyeta will also accommodate individuals with special needs, language barriers, or other requirements by providing necessary resources and support, ensuring an inclusive and accessible reporting process for everyone involved.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Confidentiality	Ensure confidentiality of those involved in harassment or discrimination complaints.	Percentage of complaints processed with confidentiality	100%(→)
2	Informal Resolution	Encourage early resolution of complaints	Percentage of cases resolved	15%(↑)
3	Formal Grievance Procedure	Ensure fair and structured grievance handling	Percentage of cases handled	20%(↑)
4	Protection against Retaliation	Safeguard employees from retaliation	Percentage of reported cases	10%(↓)
5	Timeframe	Expedite resolution process	Percentage of Average resolution time (days)	25%(↓)
6	Documentation	Maintain accurate grievance records	Percentage of documented cases	30% (↑)
7	External Remedies	Provide access to legal and external support	Percentage of external escalations	15%(↓)

8	Non-Retaliation	Ensure there is no retaliation against individuals reporting harassment or discrimination.	Percentage of reports handled without retaliation	100% (→)
9	Accessibility	Ensure all employees and stakeholders have access to the discrimination and harassment process.	Percentage of employees trained on accessibility of the process	100% (→)

8. Disciplinary Action for Policy Violations

Any individual found violating this policy will face appropriate disciplinary action, depending on the nature and severity of the violation. For employees, consequences may include verbal or written warnings, suspension, or termination of employment. Contractors or external stakeholders in violation may face termination of contracts, removal from projects, or, if necessary, legal action. Zyeta is committed to addressing all violations in a fair, transparent, and timely manner, ensuring that corrective actions are taken promptly to uphold the integrity of the organization and maintain a respectful, inclusive work environment for all involved.

9. Distribution

This grievance policy will be distributed to all Zyeta employees, contractors, and stakeholders, ensuring wide accessibility and understanding of the procedures. It will be made available on Zyeta’s internal systems and website, allowing easy access for all relevant parties. New employees, contractors, and partners will be provided with a copy of the policy during the onboarding process, ensuring they are fully informed from the start of their engagement with the company. This distribution process ensures that everyone within Zyeta, as well as external stakeholders, are aware of their rights and responsibilities under the grievance mechanism.

10. Conclusion

Zyeta is committed to creating a workplace where every individual feels valued, respected, and free from discrimination and harassment. This grievance mechanism provides a structured approach for addressing issues related to discrimination and harassment, ensuring that employees have a safe and confidential means of raising concerns. We are dedicated to fostering a culture of inclusion and fairness where all employees can thrive.

DISCRIMINATION AND HARASSMENT SUPPORT PROCESS ZYETA/ESG/P-07

1. Introduction

At Zyeta, we are committed to fostering an inclusive, equitable, and respectful environment free from discrimination and harassment. Regardless of background or role, all individuals should feel safe and valued. We recognize that discrimination and harassment harm not only the individuals involved but also compromise our core values of dignity and fairness. Zyeta ensures that victims of such incidents have access to a clear, effective remediation process. Our procedures are designed to address and resolve harm transparently, ensuring recovery for both the victims and the organization, while preventing future occurrences and maintaining a positive, inclusive work environment.

2. Scope of Application

2.1 Who: This policy applies to all employees, contractors, consultants, and stakeholders interacting with Zyeta.

2.2 Business Area or Operation Covered: All ZYETA operations, including design consultation, project management, and interactions with clients and suppliers.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Senior Management:

- Responsible for the overall implementation of the policy.
- Provides necessary resources for remediation processes.
- Oversees the resolution of serious discrimination or harassment cases.

3.2 Human Resources (HR):

- Manages complaints and conducts investigations.
- Determines appropriate remediation steps and supports victims.
- Ensures confidentiality and compliance with the policy.

3.3 Managers and Supervisors:

- Foster an inclusive environment and identify potential issues.
- Refer complaints to HR and support the remediation process.
- Implement corrective measures and ensure no retaliation occurs.

3.4 Employees and Contractors:

- Responsible for reporting discrimination or harassment.
- Cooperate with grievance and remediation procedures.
- Respect confidentiality and integrity throughout the process.

3.5 External Stakeholders (Clients, Suppliers, Contractors):

- Adhere to the policy and respect its procedures.
- Cooperate with investigations if involved in any discrimination or harassment.
- Support remediation actions in alignment with the policy.

4. Application of the Policy

Prohibited conduct includes discrimination based on gender, race, ethnicity, disability, sexual orientation, religion, age, or other protected categories. Harassment may take the form of verbal, physical, visual, or psychological harassment that creates a hostile work environment. Employees may report concerns via the HR department, an anonymous whistleblower system, or directly to the Ethics and Compliance Committee. All reports are handled confidentially and investigated impartially within a defined timeframe. Affected employees may access counseling, mediation, or legal support where required.

5. Governance of the Policy

This policy is governed by Zyeta's Ethics and Compliance Committee, Human Resources, and Senior Leadership. The policy aligns with applicable national and international labor laws and human rights standards.

6. Discrimination harassment Remedy Policy

6.1 Transparency

Transparency ensures accountability and fosters trust in the grievance and remediation process. It is critical that all parties involved clearly understand the steps, decisions, and outcomes at every stage. Zyeta is committed to providing open communication, detailing each step of the process to both the victim and the alleged perpetrator. Clear communication helps manage expectations and supports an understanding of the actions being taken. Additionally, thorough documentation of the process ensures that all decisions are well-recorded, providing both transparency and a clear record for future reference or review, helping maintain fairness and clarity.

6.2 Proportionality

Remediation actions should be tailored to the severity and impact of the discrimination or harassment incident. The aim is to balance justice for the victim while avoiding overly punitive measures for the perpetrator. Proportional responses ensure that both parties are treated fairly, promoting a restorative process that acknowledges the harm done without excessive punishment. Remediation actions should match the behavior's nature, with corrective measures being aligned with the level of harm caused. The goal is a fair resolution that helps restore trust in the workplace and minimizes further harm to all involved.

6.3 Monitoring

Continuous monitoring is essential to assess the effectiveness of the remediation actions and ensure that the grievances are fully addressed. Zyeta will actively track the progress of the resolution, focusing on the victim's well-being and ensuring no residual harm remains. Follow-up sessions with the victim will confirm the situation has been satisfactorily resolved, and that they feel safe and supported. Monitoring also allows Zyeta to identify any gaps in the process or potential improvements, ensuring that future grievances are handled more effectively. Additionally, feedback from victims will be used to refine the entire grievance and remediation framework.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025- March 2026
1	Transparency	Ensure transparency in the handling and resolution of discrimination and harassment complaints.	Percentage of cases where the process and outcome are communicated transparently	100% (→)
2	Proportionality	Ensure that remedies are proportional to the severity of the discrimination or harassment.	Percentage of cases where remedies are proportional to the severity	100% (→)
3	Monitoring	Monitor the effectiveness of the remedies and ensure ongoing compliance.	Percentage of cases monitored for effectiveness of remedies	100% (→)

8. Disciplinary Action for Policy Violations

Any violation of this policy, regardless of whether the offender is an employee, contractor, or external stakeholder, will lead to disciplinary action to maintain a respectful and inclusive environment. For employees, this may include written warnings, mandatory training, suspension, or termination, depending on the severity of the violation. Contractors and external stakeholders may face more severe consequences, such as contract termination, exclusion from projects, or potential legal action, in line with the nature of the breach. These actions aim to enforce the policy and deter discriminatory or harassing behavior while promoting accountability across all parties involved.

9. Distribution

This policy will be widely distributed to all employees, contractors, and relevant external stakeholders to ensure that everyone is aware of Zyeta's commitment to maintaining a safe, inclusive, and non-discriminatory environment. It will be accessible on Zyeta's internal systems, ensuring all employees can easily review it at any time. Additionally, it will be published on the company's website for external stakeholders, including partners and clients, to demonstrate transparency. As part of the onboarding process for new employees and partners, the policy will be introduced to ensure early awareness and compliance with Zyeta's standards from the outset.

10. Annual Review

To ensure ongoing effectiveness, this policy will undergo an annual review process. This review will assess its alignment with the latest best practices and any changes to local or international legal requirements. Input from a variety of stakeholders, including victims, managers, HR personnel, and other relevant parties, will be gathered to identify areas for improvement. This collaborative approach will help ensure the policy remains dynamic and responsive to emerging challenges or changes within Zyeta's operations and the broader legal and regulatory landscape. The review process will lead to necessary updates or modifications to maintain compliance and relevance.

11. Conclusion

Zyeta is dedicated to providing appropriate remediation for victims of discrimination or harassment, ensuring they are treated with dignity, fairness, and respect. The procedures outlined in this policy are designed to offer a transparent, proportional, and monitored approach to address harm, support victims, and create a safe, respectful environment for all individuals involved. By reinforcing these commitments, Zyeta aims to effectively handle incidents of discrimination and harassment, ensuring that all cases are resolved in line with the highest ethical standards. This policy underscores Zyeta's dedication to maintaining an inclusive, respectful, and secure working environment for everyone.

ANTI-CORRUPTION POLICY ZYETA/ESG/P-08

1. Introduction

Zyeta is dedicated to maintaining the highest standards of integrity and professionalism in all its operations. As a company specializing in Design Consultation and Project Management through Building Information Modeling (BIM), Zyeta upholds principles of transparency, ethics, and social responsibility. This policy outlines our commitment to preventing corruption, defined as the offering, accepting, or soliciting of any advantage to influence actions in an illegal, unethical, or untrustworthy manner. We are committed to complying with all relevant laws and standards, ensuring that our business practices remain free from corruption, both within India and internationally.

2. Scope of Application

2.1 Who: All employees, directors, officers, consultants, contractors, suppliers, and business partners.

2.2 Business Areas/Operations Covered: All business transactions, project management, and design consultation processes utilizing Building Information Modeling (BIM).

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Board of Directors

- Oversee the implementation and adherence to anti-corruption policies and laws.
- Ensure the company operates according to ethical standards.
- Establish the anti-corruption framework and monitor its effectiveness.

3.2 Management

- Communicate the anti-corruption policy across all departments.
- Ensure employees and external partners understand their responsibilities.
- Provide necessary support to maintain compliance with the policy.

3.3 Employees

- Comply with the anti-corruption policy at all times.
- Report instances of corruption or suspicious activities to supervisors or through whistleblower channels.
- Be proactive in upholding ethical standards and the company's policies.

3.4 Compliance Officer

- Implement, monitor, and enforce the Anti-Corruption Policy.
- Provide guidance on what constitutes a violation of the policy.
- Review and act on reports of corruption or policy violations.

3.5 External Partners and Suppliers

- Adhere to the anti-corruption policy in all dealings with the company.
- Ensure contracts with third parties include compliance clauses.
- Maintain ethical business practices and report any suspicious activities.

4. Application of the policy

4.1. It is our policy to conduct all of our business in an honest and ethical manner. We take zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the INDIA, THE ANTI-CORRUPTION LAWS (AMENDMENT) ACT1967, UK Bribery Act 2010 and US Foreign Corrupt Practices Act in respect of our conduct both at home and abroad.

4.2. The purpose of this policy is to: (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and (b) provide information and guidance to those working for us on how to recognize and deal with bribery and corruption issues.

5. Governance of this Policy

The governance of this policy is overseen by Zyeta's Senior Management Team, supported by the Compliance and Ethics Committee.

The policy is integrated into Zyeta's broader governance and risk management frameworks. Regular oversight and reporting will be conducted to ensure adherence to the policy and to evaluate its effectiveness in preventing corrupt practices.

6. Who is covered by the policy?

6.1. This anti-bribery 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 (within or outside of India).

6.2. This policy also applies to individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, horn workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

6.3. In the context of this policy, third-party refers to any individual or organization our company 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.

6.4. Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

7. Definition of bribery?

7.1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, Accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

7.2. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

7.3. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

7.4. Bribery is illegal Employees must not engage in any form of bribery, whether it be Directly, passively (as described above), or through a third party (such as an agent or Distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

8. What is and what is NOT acceptable?

8.1. This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions

8.2. Bribery and corruption are punishable for individuals and if we are found to have taken part in corruption, we could face an unlimited fine and face damage to our reputation. We therefore take our legal responsibilities very seriously.

8.3. We have identified that certain of our activities create particular risks for our organization, in particular: (a) overseas collaborations, joint ventures and partnerships. (Whether formal or informal); (b) Recruitment of students, particularly overseas; (c) Receipt of gifts and donations; (d) Grant funding; and (e) Public procurement, particularly where the activities relate to construction.

8.4. Offences of bribing another person

a. A person ("P") is guilty of an offence if either of the following cases applies.

b. Case 1 is where— (a) P offers, promises or gives a financial or other advantage to

Another person and (b) P intends the advantage— (i) to induce a person to perform improperly a relevant function or activity, or (ii) to reward a person for the improper performance of such a function or activity.

c. Case 2 is where— (a) P offers, promises or gives a financial or other advantage to another person, and (b) P knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity.

d. In case 1 it does not matter whether the person to whom the advantage is offered, promised or given is the same person as the person who is to perform, or has performed, the function or activity concerned. 13 2 Bribery Act 2010 (c. 23) (5) In cases 1 and 2 it does not matter whether the advantage is offered, promised or given by P directly or through a third party.

8.5. Offences relating to being bribed

a. A person ("R") is guilty of an offence if any of the following cases applies.

b. Case 3 is where R requests, agrees to receive or accepts a financial or other advantage

Intending that, in consequence, a relevant function or activity should be performed improperly (whether by R or another person).

c. Case 4 is where— (a) R requests, agrees to receive or accepts a financial or other advantage, and (b) the request, agreement or acceptance itself constitutes the improper performance by R of a relevant function or activity.

d. Case 5 is where R requests, agrees to receive or accepts a financial or other advantage as a reward for the improper performance (whether by R or another person) of a relevant function or activity.

e. Case 6 is where, in anticipation of or in consequence of R requesting, agreeing to receive or accepting a financial or other advantage, a relevant function or activity is performed improperly— (a) by R, or (b) by another person at R's request or with R's assent or acquiescence.

f. In cases 3 to 6 it does not matter— (a) whether R requests, agrees to receive or accepts (or is to request, agree to receive or accept) the advantage directly or through a third party, (b) whether the advantage is (or is to be) for the benefit of R or another person.

g. In cases 4 to 6 it does not matter whether R knows or believes that the performance of the function or activity is improper.

h. In case 6, where a person other than R is performing the function or activity, it also does not matter whether that person knows or believes that the performance of the function or activity is improper.

i. "Relevant expectation"—

Small gift or token of esteem or gratitude is often an appropriate way for business people to display respect for each other. Some hallmarks of appropriate gift-giving are when the gift is given openly and transparently, properly recorded in the giver's books and records, provided only to reflect esteem or gratitude, and permitted under local law. Items of nominal value, such as cab fare, reasonable meals and entertainment expenses, or company promotional items, are unlikely to improperly influence an official, and, as a result, are not, without more, items that have resulted in enforcement action by DOJ or SEC.

The larger or more extravagant the gift,

However, the more likely it was given with an improper purpose. DOJ and SEC enforcement cases thus have involved single instances of large, extravagant gift-giving (such as sports cars, fur coats, and other luxury items) as well as widespread gifts of smaller items as part of a pattern of bribes.

9. Employee Responsibilities:

9.1 As an employee of Zyeta, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

9.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

9.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Compliance Manager or the HR Team.

9.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Zyeta has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

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

10.1. This section of the policy covers 3 areas

a. How to raise a concern.

b. What to do if you are a victim of bribery or corruption.

c. Protection.

10.2 How to raise a concern: If you suspect that there is an instance of bribery/corrupt Activities occurring in relation to you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behavior can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the Head of Governance and Legal.

10.3 What to do if you are a victim of bribery or corruption: You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

10.4. Protection

a. If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, we understand that you may feel worried about potential repercussions. Zyeta, will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

b. Zyeta will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

c. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

11. Training and communication?

11.1. Zyeta 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.

11.2. Zyeta's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

11.3. Zyeta will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

12. Record keeping

12.1. Zyeta will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

13. Monitoring and reviewing

13.1. Zyeta's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

13.2. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

13.3. 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.

13.4. This policy does not form part of an employee's contract of employment and Zyeta may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

13.5. To address these risks we have taken the following steps: (a) Implemented an anti-bribery and corruption policy; (b) Undertaken a risk assessment exercise, which will be subject to ongoing review; (c) Undertaken a training programme of senior management; (d) Taken steps to implement a training programme for all individuals operating in areas of the organization that are perceived as high risk; (e) Appointed the Vice- Provost (Operations) as the Compliance Manager to ensure compliance with Bribery Act issues; (f) Reviewed and amended policies related to this Anti-corruption and Bribery Policy, including the Public Interest Disclosure Policy; and (g) Prepared standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.

13.6. In this policy, third party means any individual or organization you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

13.7. As per UK Bribery act 2010, applicable policy under our company rule to implement with immediate effect, Top-level commitment in the business to not paying or receiving bribes A risk assessment had been conducted Due diligence had been conducted Communication on anti-bribery policies, including on gifting and conflict of interest. Monitoring and review of policies and controls, including within subsidiaries/branches

13.8. Zyeta Management and HR Team will give induction to all new Joiners and training would be conducted twice in a year to create awareness and to encourage all employees to comply as mandatory

14. What does your policy cover?

This anti-bribery policy exists to set out the responsibilities of and those who work for using regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.

15. Anti-Corruption policy

15.1 Bribery and Corruption

Zyeta strictly prohibits employees or representatives from offering, promising, or giving any form of bribe to influence decisions or actions. This includes not only monetary bribes but also gifts, services, or anything of value that may improperly influence an individual or organization. Such actions are considered unethical and illegal, and may result in severe consequences for both the individual and the company. Employees must act with integrity and refrain from any conduct that could be perceived as an attempt to sway decisions or actions through bribery, ensuring compliance with anti-corruption laws.

15.2 Sensitive Transaction Protocol

Zyeta enforces a stringent approval process for sensitive transactions to prevent the risk of corruption or bribery. This includes transactions with external stakeholders that could be perceived as favors. Transactions are reviewed by senior management for appropriateness, transparency, and compliance with legal and ethical standards. Our procedure ensures that any significant transactions are closely scrutinized before approval.

15.3 Accepting or Soliciting Bribes

Zyeta employees, contractors, and agents are prohibited from accepting or soliciting any form of bribe, kickback, or advantage from any party in exchange for favorable treatment, decisions, or access. This includes any personal or professional benefit that could influence impartiality or lead to biased decision-making. Accepting or soliciting bribes undermines trust and violates ethical standards, as it can lead to unfair business practices. Employees must remain vigilant and reject any offers that may compromise their judgment, upholding the company's commitment to ethical business conduct and complying with relevant anti-corruption laws.

15.4 Facilitation Payments

Zyeta has a strict policy against facilitation payments, which are small payments made to government officials or other individuals to expedite or secure routine government actions, such as obtaining permits, licenses, or other official documents. These types of payments are often considered as a form of bribery, even if they seem small or routine. Employees must not engage in or approve of such payments under any circumstances. Zyeta is committed to maintaining transparency and integrity in all dealings, ensuring that employees follow proper legal and ethical procedures when interacting with government officials and other entities.

15.5 Risk of Corruption and Bribery

Corruption and bribery pose significant risks across all sectors, particularly in industries like design, project management, and construction, which interact with public and private entities. Offering or accepting bribes can increase operational costs, compromise business decisions, and create unfair competition. Zyeta is committed to maintaining the highest ethical standards by prohibiting any form of corruption, including offering, requesting, or accepting bribes, kickbacks, or facilitation payments. The company will implement proactive measures to ensure compliance with anti-corruption laws, enforcing robust internal controls to detect and prevent corrupt activities, ensuring ethical practices across operations.

15.6 Gifts and Hospitality

Zyeta recognizes that business relationships can sometimes involve the exchange of gifts or hospitality. However, any gifts or hospitality given or received must never be intended to influence business decisions or actions. They should always be reasonable, appropriate, and transparent, and in line with the company's ethical standards. Gifts and hospitality should be modest and given in the spirit of building genuine business relationships, not as a means to secure favorable treatment. Employees must report any instances where they are uncertain if a gift or hospitality offer is in compliance with the company's policy.

15.7 Corruption Control Audits

Zyeta ensures that our anti-corruption measures are subject to regular audits, both internally and externally, to assess their effectiveness. The audits cover our ethics and compliance systems and provide a comprehensive review of control procedures designed to prevent bribery and corruption. Findings from these audits lead to actionable improvements and updates to our control systems.

15.8 Insufficient Reporting Safeguards

Without an effective whistleblower protection system, employees and stakeholders may fear retaliation when reporting corruption or bribery, leading to underreporting and continued unethical practices. Zyeta is committed to maintaining a confidential, secure, and non-retaliatory reporting system for employees and stakeholders to raise concerns about corruption or unethical behavior. The company will take necessary measures to protect whistleblowers from retaliation and ensure that all reports are promptly investigated and addressed. This approach reinforces Zyeta's commitment to transparency, accountability, and creating a safe environment where unethical conduct can be reported and rectified.

15.9 Political and Charitable Donations

Zyeta refrains from engaging in political donations or contributions to political parties or candidates. This is to avoid any perception of influence over political decisions or favoring specific political interests. Charitable donations are made based on Zyeta's values and are always transparent and documented to maintain accountability. These donations should be made with a clear purpose of supporting genuine causes, not as a form of indirect bribery or influence. Employees are encouraged to ensure that all charitable contributions align with the company's ethical standards and are fully compliant with applicable laws and regulations.

15.10 Corruption Risk Evaluation

Zyeta conducts regular corruption risk assessments across our operations to identify and prioritize potential risks. These assessments are updated periodically, focusing on areas most vulnerable to corruption. Our assessment results help in forming corrective action plans and addressing any identified risks effectively. These risk evaluations support our commitment to preventing corruption at all levels.

15.11 Third-Party Corruption Screening

Zyeta implements a comprehensive anti-corruption due diligence program to ensure that third-party partners, including suppliers, contractors, consultants, and others, comply with anti-corruption regulations. The program includes risk-based assessments, background checks, and continuous monitoring. We collect relevant data on third parties, benchmark their practices, and investigate any potential risks to prevent corruption. Our due diligence processes are designed to ensure that all third-party engagements are free from corrupt activities.

15.12 Reputational Risk

Involvement in corruption or bribery incidents can significantly damage a company's reputation, particularly for organizations like Zyeta that rely on trust and long-term business relationships. A corruption scandal can erode client trust, tarnish brand image, and harm business development efforts. Zyeta is committed to preserving its reputation by rejecting any form of corruption or bribery. Through strict anti-corruption policies and transparent practices, Zyeta ensures that stakeholders can rely on the company's integrity and ethical behavior, fostering long-term trust and credibility in the industry and market.

15.13 Increased Business Costs

Corruption and bribery often result in higher operational costs, including inflated project expenses, inefficient resource utilization, and unethical payments for permits or favorable treatment. This undermines profitability and reduces the ability to compete effectively in the market. Zyeta firmly rejects any form of bribery or corruption in its decision-making processes, ensuring that project costs are determined through fair and transparent methods. By adhering to ethical standards, Zyeta maintains competitive pricing, optimizes resource allocation, and ensures sustainability in business operations, free from the distortions caused by corrupt practices.

15.14 Employee Engagement Deficiency

Employees who are unaware of anti-corruption policies may unknowingly engage in or become complicit in corrupt activities, leading to non-compliance and potential legal consequences for the company. To address this risk, Zyeta is committed to providing comprehensive training and raising awareness about its anti-corruption policy. Continuous education programs, awareness campaigns, and open communication ensure that all employees, contractors, and third parties understand their responsibilities and can effectively recognize, prevent, and report any form of corruption or bribery. This empowers employees to contribute to maintaining an ethical workplace environment.

15.15 Bribery Prevention Training

Zyeta is committed to ensuring all employees are well-equipped to recognize and prevent corruption and bribery. We conduct regular training programs on ethical conduct, anti-corruption laws, and the prevention of bribery. These programs aim to raise awareness of legal, regulatory, and company standards on anti-corruption. Training materials include presentations, case studies, and assessments to ensure employees understand their roles in fostering a corruption-free workplace.

15.16 Compliance Oversight Gap

Failure to implement effective monitoring and enforcement mechanisms can result in undetected corruption and bribery, damaging the company's culture and exposing it to legal risks. To mitigate this, Zyeta will establish and continuously review robust monitoring systems to identify and address corruption risks. Clear reporting channels will be available, including whistleblower protections, encouraging employees to report unethical behavior safely and confidentially. Zyeta will thoroughly investigate reported issues and ensure that prompt corrective actions are taken, reinforcing a zero-tolerance stance toward corruption and maintaining strong ethical standards across all operations.

15.17 Legal Risk of Non-Compliance

As anti-corruption regulations become stricter globally, businesses face legal risks for non-compliance. Zyeta operates in India and internationally, requiring adherence to both domestic and international laws such as the Prevention of Corruption Act, 1988 (India) and the Foreign Corrupt Practices Act (FCPA, USA). To mitigate legal risks, Zyeta is committed to full compliance with all relevant anti-corruption laws in the countries where it operates. The company ensures that employees, contractors, and partners uphold ethical standards and comply with legal frameworks, taking necessary actions to avoid legal exposure and support the fight against corruption.

15.18 Whistleblower Corruption Reporting

Zyeta has established a secure and confidential whistleblower procedure to enable stakeholders to report corruption or bribery without fear of retaliation. Our whistleblowing system ensures confidentiality, guarantees non-retaliation, and provides multiple reporting channels, including internal and third-party communication methods such as hotlines, emails, and designated personnel. This encourages transparency and accountability within the organization.

16. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025- March 2026
1	Bribery and Corruption	Prevent offering, promising, or giving bribes in any form.	Number of bribery-related incidents reported	0 (→)
2	Sensitive Transaction Protocol	Ensure sensitive transactions are thoroughly approved and reviewed.	Percentage of sensitive transactions with documented approval	100%(→)
3	Accepting or Soliciting Bribes	Eliminate the practice of accepting or soliciting bribes.	Number of bribery-related incidents reported	0(→)
4	Facilitation Payments	Eliminate facilitation payments in business transactions.	Number of facilitation payments made	0(→)
5	Risk of Corruption and Bribery	Identify and mitigate the risk of corruption and bribery in business practices.	Percentage reduction in corruption risk incidents	0%(→)
6	Gifts and Hospitality	Ensure all gifts and hospitality provided comply with company policy.	Percentage of gifts and hospitality requests denied	100% ^c
7	Corruption Control Audits	Conduct periodic audits to assess the effectiveness of anti-corruption controls.	Number of anti-corruption audits conducted	1/year(↑)
8	Compliance Oversight Gap	Strengthen monitoring and enforcement of anti-corruption policies.	Percentage of compliance checks completed	100%(→)
9	Political and Charitable Donations	Ensure transparency and compliance in political and charitable donations.	Percentage of donations with documented approval process	100%(→)

10	Corruption Risk Evaluation	Regularly evaluate and mitigate corruption risks.	Number of corruption risk evaluations completed	1(↑)
11	Third-Party Corruption Screening	Screen third-party vendors for corruption risks.	Percentage of third parties screened for corruption risk	100%(→)
12	Reputational Risk	Mitigate reputational risk associated with corruption and bribery.	Percentage reduction in incidents affecting the company's reputation	0%(→)
13	Increased Business Costs	Minimize increased costs caused by corruption and bribery.	Percentage reduction in business costs due to corruption	2%(↓)
14	Employee Engagement Deficiency	Increase employee awareness and engagement in anti-corruption initiatives.	Percentage of employees completing anti-corruption training	100%(→)
15	Bribery Prevention Training	Provide training on bribery prevention for employees and third parties.	Percentage of employees and third parties trained	100%(→)
16	Insufficient Reporting Safeguards	Strengthen whistleblower protections for reporting corruption.	Percentage of whistleblower reports investigated	100%(→)
17	Legal Risk of Non-Compliance	Reduce the legal risk of non-compliance with anti-corruption laws.	Number of legal violations related to anti-corruption policies	0(→)
18	Whistleblower Corruption Reporting	Implement effective whistleblower corruption reporting systems.	Percentage of corruption-related whistleblower reports received	100%(→)

17. Disciplinary Action for Policy Violations

Any violation of the Anti-Corruption Policy will result in disciplinary action, which may include termination of employment or contract. If the violation involves illegal conduct, Zyeta may report the matter to law enforcement authorities for further investigation. The following steps will be taken in the event of a violation: First, an internal investigation will be conducted to understand the details of the breach. Then, appropriate corrective actions, such as retraining, reassignment, or termination, will be implemented. For serious violations, the company may report the incident to relevant legal authorities for prosecution, depending on the severity and nature of the violation.

18. Distribution

The Anti-Corruption Policy will be distributed to all employees, contractors, agents, and relevant external partners to ensure they are fully aware of the company's commitment to ethical conduct and anti-corruption practices. It will be included in employee handbooks, onboarding materials, and training programs. The policy will also be accessible on the company's intranet, and signed acknowledgments may be required to confirm understanding. By ensuring widespread distribution, Zyeta aims to foster a culture of compliance and transparency across all levels of the organization and among its partners, reinforcing the importance of adhering to anti-corruption principles.

19. Annual Review

The Anti-Corruption Policy will undergo an annual review to ensure its relevance and effectiveness in addressing emerging risks and compliance requirements. During the review, the company will assess the policy's alignment with applicable laws and regulations, making any necessary updates to maintain its integrity. Management will evaluate the policy's implementation and monitor its impact, identifying any areas for improvement or additional training needs. The annual review process serves as an opportunity to reinforce the company's commitment to ethical conduct and make any necessary adjustments to prevent corruption and unethical behavior.

20. Conclusion

Zyeta is committed to maintaining integrity and transparency in all its business practices. Corruption erodes public trust and damages the reputation of organizations, which is why Zyeta has implemented this Anti-Corruption Policy to foster a fair, ethical, and transparent environment for all stakeholders. Every individual associated with Zyeta, including employees, contractors, and partners, is expected to uphold this commitment by adhering to anti-corruption standards. By doing so, Zyeta aims to remain a leader in its industry, ensuring continued success while protecting its reputation and contributing to a culture of ethical business conduct.

CONFLICT OF INTEREST POLICY

ZYETA/ESG/P-09

1. Introduction

At Zyeta, managing conflicts of interest (COI) is essential to maintaining the integrity and ethical standards of our design consultation and project management services. A conflict of interest occurs when personal interests—financial, familial, or professional—could interfere with an individual’s ability to act impartially and in the best interests of the organization. This policy outlines the procedures for identifying, addressing, and managing potential conflicts that may arise during business operations. By adhering to this framework, Zyeta ensures transparency, accountability, and ethical decision-making, safeguarding the trust of our clients and maintaining the high standards of our services.

2. Scope of Application

2.1 Who is Covered: This policy applies to all employees, board members, consultants, contractors, and any other individuals engaged in business with Zyeta.

2.2 Business Area or Operation Covered: The policy covers all aspects of Zyeta’s design consultation and project management services, including client interactions, procurement, vendor management, and decision-making processes.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Employees and Contractors

- Employees and contractors must disclose any actual, perceived, or potential conflicts of interest to their supervisor or ethics officer.
- Personal, professional, or financial interests should not conflict with duties at Zyeta.
- Ensure actions align with the best interests of Zyeta, prioritizing company goals over personal gain.

3.2 Managers and Supervisors

- Managers must identify potential conflicts of interest within their teams and take steps to resolve them.

- They are responsible for advising employees on how to handle conflicts effectively.
- Managers should guide employees in understanding and adhering to the conflict of interest policy.

3.3 Human Resources and Ethics Committee

- HR and the ethics committee ensure policy adherence, investigate conflicts, and enforce disciplinary actions.
- They are responsible for investigating reports of potential conflicts of interest.
- HR provides training to employees to help them identify and resolve conflicts of interest.

3.4 Board of Directors and Senior Management

- The board of directors and senior management oversee the implementation of the conflict of interest policy.
- They ensure the organization maintains ethical behavior at all levels.
- Senior management makes the final decision on unresolved or complex conflicts.

4. Application of the Policy

This policy applies to scenarios such as personal financial interests in vendors, suppliers, or clients; employment or consultancy outside ZYETA that competes with the company's interests; receiving gifts or favors that may influence decision-making; nepotism or favoritism in hiring and project allocation; and confidentiality breaches that may provide unfair advantages.

5. Governance of this Policy

The governance of this policy is overseen by Zyeta's Senior Management Team and supported by the Ethics and Compliance Committee. The policy is integrated into the company's overall governance framework, with periodic reviews to ensure its effectiveness and alignment with best practices. Senior management is responsible for enforcing this policy, while the Compliance Committee provides oversight and guidance to ensure proper implementation.

6. Conflict of interest policy

6.1 Conflict Management Framework

Upon disclosure, Zyeta will assess whether the conflict is real or perceived and determine the appropriate actions. Possible resolutions include reassigning the employee to a different role or project where the conflict does not arise, requiring recusal from decisions involving the conflict, or implementing additional oversight to ensure impartiality. The goal is to prevent any undue influence on decision-making processes. Zyeta is committed to addressing conflicts promptly, ensuring that actions are taken to preserve ethical standards, and maintaining the trust of clients and stakeholders in the organization's integrity.

6.2 Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests—whether financial, familial, professional, or otherwise—have the potential to interfere with their ability to act in the best interest of Zyeta. Such conflicts can manifest in various forms, such as personal financial stakes influencing decisions in procurement or project approvals, familial or personal relationships swaying hiring or contract choices, involvement in external businesses related to competitors or partners, or accepting gifts or incentives that could create bias in decision-making. Addressing COI is vital to maintaining impartiality and ethical integrity in business operations.

6.3 Preventing Conflict of Interest

To prevent conflicts of interest, employees must proactively avoid situations where personal interests could affect their professional duties. Employees should refrain from accepting gifts, favors, or incentives that may be perceived as influencing their judgment. Additionally, they should avoid involvement in decisions affecting entities where they have direct or indirect financial interests. By being mindful of these potential conflicts, employees contribute to a transparent, ethical work environment where decisions are made objectively and in the best interests of Zyeta, fostering trust and integrity in all business practices.

6.4 Disclosure of Conflict of Interest

Employees and contractors must disclose any potential or actual conflict of interest promptly. Disclosures should be made to the manager, HR department, or designated ethics officer. The disclosure form should include a clear description of the conflict, the parties involved (if applicable), and suggested measures to mitigate or address the conflict.

Timely and transparent disclosure ensures that Zyeta can evaluate and manage the situation effectively, maintaining the integrity of decision-making processes. By fostering an environment of openness, Zyeta upholds ethical standards and ensures accountability in its operations.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Conflict Management Framework	Establish processes to assess and manage disclosed conflicts of interest effectively.	Percentage of disclosed conflicts assessed and addressed	100%(→)
2	Definition of Conflict of Interest	Define and communicate what constitutes a conflict of interest within the organization.	Percentage of employees acknowledging the conflict of interest policy	100%(→)
3	Preventing Conflict of Interest	Prevent potential conflicts of interest through policies and ethical guidelines.	Percentage of policies and processes that prevent conflicts of interest	100%(→)
4	Disclosure of Conflict of Interest	Ensure all employees and key stakeholders disclose any potential conflicts of interest.	Percentage of employees and stakeholders completing conflict of interest disclosures	100%(→)

8. Disciplinary Action for Policy Violations

Failure to disclose a conflict of interest or adhere to the Anti-Corruption Policy may lead to disciplinary action, depending on the severity of the violation. Potential actions include a reprimand or warning, suspension or reassignment, or termination of employment or contract. Disciplinary measures will be determined in line with Zyeta's HR policies, taking into consideration the nature of the conflict and its impact on the company's operations, reputation, and ethical standards. These actions are designed to uphold the integrity of the organization and ensure compliance with both internal policies and external legal requirements.

9. Distribution

The Anti-Corruption Policy will be widely distributed to all employees, contractors, agents, and relevant external partners to ensure full understanding and compliance. This includes incorporating the policy into employee handbooks, onboarding programs, and providing it via the company's intranet for easy access. Regular training and awareness sessions will be conducted to reinforce the policy's importance. Additionally, employees will be required to acknowledge their understanding and commitment to the policy through signed statements. This proactive distribution ensures that all stakeholders are informed and held accountable for upholding Zyeta's anti-corruption standards, contributing to a transparent and ethical workplace.

10. Annual Review

The Anti-Corruption Policy will undergo an annual review to ensure its continued relevance, effectiveness, and compliance with evolving legal standards. This review will assess the policy's alignment with both domestic and international anti-corruption regulations. During the review, management will evaluate the implementation and impact of the policy, identify any gaps, and recommend necessary adjustments. Any updates will be communicated to all employees, contractors, and partners to maintain awareness and adherence. The annual review ensures Zyeta remains committed to ethical practices, helps address emerging risks, and strengthens internal controls to prevent corruption and bribery.

11. Conclusion

The implementation of a robust Conflict of Interest policy is vital to maintaining the integrity, trust, and ethical standards at Zyeta. By identifying and addressing conflicts of interest, we ensure transparent, fair, and accountable operations, which support the high-quality services we provide to our clients. Employees and contractors must fully understand and adhere to this policy, as it is essential to both personal and organizational success.

ANTI-FRAUD POLICY ZYETA/ESG/P-10

1. Introduction

Fraud involves intentional deceit or misrepresentation for unfair advantage, often at the expense of others. At Zyeta, a company manufacturing rubber products, fraud can take the form of falsified records, misappropriated assets, or fraudulent financial reporting. In line with our commitment to integrity, transparency, and ethical conduct, Zyeta has developed a Fraud Policy to prevent, detect, and address fraudulent activities. This policy protects the company's reputation and stakeholders from the damaging effects of fraud. Integrating our Sustainability Management System, Zyeta ensures that fraud does not undermine our business values, objectives, or operational integrity.

2. Scope of Application

2.1 Who is Covered: This policy applies to all employees, contractors, consultants, suppliers, vendors, and any third parties associated with Zyeta.

2.2 Business Area or Operation Covered: This policy applies to all design consultation, project management, and Building Information Modeling (BIM) operations conducted by ZYETA, including procurement, financial transactions, and client engagements.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Employees

- Employees must report any suspected fraud or irregularities to their manager, HR, or the fraud investigation officer immediately.
- Full cooperation is expected during fraud investigations, including providing evidence or testimony if required.
- Failure to report fraud or dishonest activity may result in disciplinary action.

3.2 Managers and Supervisors

- Managers are responsible for monitoring their teams for signs of fraud or unethical behavior.
- Any suspicion of fraud must be reported promptly to HR or the designated fraud officer.

- Managers must assist in investigations by providing documentation and ensuring employee availability, while maintaining confidentiality.

3.3 Human Resources (HR) and Compliance Department

- HR and the compliance department investigate fraud allegations, work with legal and auditing teams, and decide on corrective actions.
- HR ensures employees are aware of the fraud policy and receive regular training on identifying and reporting fraud.
- They also maintain records of investigations and actions taken for compliance purposes.

3.4 Fraud Investigation Officer/Compliance Committee

- The fraud investigation officer or compliance committee leads investigations, ensuring confidentiality and fairness.
- They work with HR to determine appropriate disciplinary actions based on the severity of the fraud.
- The officer/committee also reports findings to senior management to take further action if needed.

3.5 Board of Directors and Senior Management

- Senior management and the board are responsible for ensuring the effective implementation of the fraud policy across the organization.
- They oversee major fraud investigations and decisions regarding allegations and outcomes.
- Senior management collaborates with compliance and internal audit teams to identify fraud risks and proactively manage them.

4. Application of the policy

This policy applies to all business transactions, procurement, contracts, and financial dealings, ensuring the prevention of fraud, corruption, and unethical behavior. ZYETA is committed to maintaining transparency, accountability, and ethical practices across all operations, safeguarding company assets and stakeholder trust through robust controls and proactive fraud detection measures.

5. Governance of this Policy

The governance of this policy is overseen by Zyeta's Senior Management and supported by the Ethics and Compliance Committee. The policy forms part of Zyeta's broader corporate governance framework, and it ensures that the company meets its legal obligations and complies with best practices in anti-fraud measures. Senior management is responsible for ensuring the implementation and effectiveness of this policy, while the Ethics and Compliance Committee is tasked with monitoring, auditing, and reporting on any instances of fraud.

6. Anti-Fraud Policy

6.1 Reporting Fraud

Zyeta encourages all employees and stakeholders to report suspected fraudulent activity through various channels. Reports can be made directly to a manager or supervisor, the Human Resources or Compliance Department, or through the company's anonymous whistleblowing hotline or online reporting system. Employees can also report concerns to an external fraud investigation officer or auditor.

All reports will be handled with confidentiality to protect the identity of the reporting individual. Zyeta ensures that those who report fraud in good faith are safeguarded from retaliation, promoting a transparent and accountable environment.

6.2 Preventive Measures

Zyeta implements several preventive measures to reduce the risk of fraud within the organization. Segregation of duties ensures that no single person has control over critical processes, minimizing the opportunity for fraud. Strong internal controls are established across areas such as financial reporting, procurement, and inventory management to detect fraudulent activities early.

Regular fraud awareness training is provided to employees, educating them on recognizing suspicious behavior and the steps to report fraud. Zyeta also maintains an anonymous whistleblowing mechanism, protecting individuals from retaliation when reporting fraud or unethical conduct.

6.3 Investigating Fraud

When a fraud report is received, Zyeta initiates a comprehensive and confidential investigation. The process begins with an initial assessment to determine whether the allegation has merit and warrants further investigation.

If necessary, evidence is gathered, including documents, witness statements, and other relevant materials to substantiate the claim. Interviews are conducted with the involved individuals, witnesses, and relevant parties to gather information. Based on the findings, Zyeta takes appropriate corrective actions, which may include disciplinary measures, legal action, or other steps to address the issue and prevent future fraud.

6.4 Definition of Fraud

Fraud at Zyeta refers to intentional deception aimed at securing unfair or illegal financial gain, or causing harm to the company or its stakeholders. Examples include financial fraud, such as falsifying financial records or embezzling funds; procurement fraud, like rigging procurement processes or awarding contracts based on kickbacks; asset misappropriation, which involves theft or misuse of company property; bribery and corruption, involving offering or accepting bribes to influence decisions; and false reporting, such as providing misleading information to clients or authorities. Zyeta takes a firm stance against all forms of fraud to protect its integrity.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Reporting Fraud	Encourage and ensure the reporting of suspected fraud incidents.	Percentage of fraud incidents reported	0%(→)
2	Preventive Measures	Implement preventive measures to reduce the risk of fraud.	Percentage reduction in fraud incidents	0%(→)
3	Investigating Fraud	Ensure timely and thorough investigation of reported fraud cases.	Percentage of fraud reports investigated within 30 days	100%(→)
4	Definition of Fraud	Clearly define what constitutes fraud within the organization.	Percentage of employees acknowledging the fraud definition policy	100%(→)

8. Disciplinary Action for Policy Violations

Fraudulent activities are considered severe violations of Zyeta's values and policies. Employees found engaging in fraud will face strict disciplinary action, including immediate termination of employment in cases of serious violations. If the fraud involves illegal activities, criminal prosecution may be pursued. In cases of financial theft or misappropriation, employees may be required to make restitution, reimbursing stolen funds or assets. For less severe cases, temporary suspension may be applied while the investigation is ongoing. Zyeta is committed to maintaining a zero-tolerance policy toward fraud to ensure the integrity of its operations and protect stakeholders.

9. Distribution

Zyeta's Fraud Policy will be widely distributed to all employees, contractors, and relevant stakeholders to ensure thorough understanding and compliance. The policy will be incorporated into employee handbooks, onboarding materials, and made accessible through the company's intranet. Regular training sessions will be conducted to emphasize the importance of the policy and provide guidance on identifying and reporting fraudulent activities. Employees will also be required to acknowledge their understanding and commitment to the policy, reinforcing their responsibility in upholding Zyeta's ethical standards. This distribution ensures all parties are informed, accountable, and equipped to prevent and report fraud.

10. Annual Review

The Fraud Policy will undergo an annual review to ensure its continued effectiveness and alignment with evolving legal standards and best practices. The review process will assess the implementation of the policy, the effectiveness of preventive measures, and any emerging risks related to fraud. Management will work with the compliance department to evaluate the policy's performance and identify areas for improvement. Any necessary updates will be made, and changes will be communicated to all employees, contractors, and partners to maintain compliance. This review reinforces Zyeta's ongoing commitment to a transparent and fraud-free workplace.

11. Conclusion

The prevention and management of fraud are critical to safeguarding Zyeta's reputation, integrity, and long-term success. By adhering to this policy, Zyeta strives to foster an environment where fraud is not tolerated, employees are encouraged to act ethically, and transparent practices are upheld across all levels. This policy ensures compliance with legal regulations, protects the company's assets from fraudulent activities, and reinforces the trust and confidence of our clients, employees, and stakeholders. Zyeta is committed to maintaining a culture of honesty and integrity, where every individual contributes to a fraud-free and accountable organization.

ANTI- MONEY LAUNDERING POLICY ZYETA/ESG/P-11

1. Introduction

Money laundering is the illegal process of disguising the origin of illegally obtained funds, making them appear legitimate. It often involves complex financial transactions to obscure the illegal source of money. As Zyeta, a company offering design consultation, project management, and Sustainability Management Systems, we prioritize transparent, ethical business practices. We are committed to preventing and identifying any involvement in money laundering activities. This Money Laundering Policy provides a clear framework for detecting, preventing, and addressing potential money laundering within our operations. By adhering to this policy, Zyeta ensures legal compliance and upholds our commitment to integrity and accountability.

2. Scope of Application

2.1 Who is Covered: This policy applies to all Zyeta employees, management, directors, contractors, consultants, and any third parties conducting business on behalf of the company.

2.2 Business Area or Operations Covered: All services provided by Zyeta, including design consultation, project management, and Building Information Modeling (BIM), are subject to this policy.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Employees and Contractors

- Employees and contractors must report any suspicious activity or transactions to their manager, the Compliance Officer, or designated reporting channels.
- They must be aware of potential money laundering risks and remain vigilant in identifying suspicious actions.
- Employees are required to cooperate fully with investigations, providing documents or testimony when necessary.

3.2 Managers and Supervisors

- Managers are responsible for ensuring team adherence to the Money Laundering Policy and monitoring activities that may expose Zyeta to risks.
- They must identify and report any suspicious transactions or behaviors to the Compliance Officer or relevant authorities.
- Managers are tasked with ensuring their teams are trained on recognizing money laundering risks and compliant practices.

3.3 Compliance Officer

- The Compliance Officer oversees the implementation of the Money Laundering Policy, guiding employees to ensure legal compliance.
- They are responsible for investigating suspicious activity, coordinating with authorities, and making necessary legal reports.
- The Compliance Officer ensures the company's ongoing adherence to anti-money laundering regulations.

3.4 Finance and Audit Departments

- The Finance and Audit departments monitor financial transactions and ensure that appropriate controls are in place to prevent money laundering.
- They conduct regular audits and reviews to assess the effectiveness of anti-money laundering measures.
- These teams identify potential risks and ensure that controls are adjusted as needed to mitigate those risks.

3.5 Senior Management and Board of Directors

- Senior management and the board ensure compliance with the Money Laundering Policy and allocate necessary resources for its implementation.
- They provide strategic oversight to ensure the organization meets all compliance requirements related to money laundering.
- The board receives regular updates on the company's anti-money laundering efforts, ensuring continuous monitoring and improvement.

4. Application of the Policy

This policy mandates all employees and business associates to conduct due diligence on clients, vendors, and third parties, ensuring that business dealings align with AML regulations. They must promptly report any suspicious transactions or activities that may indicate money laundering or financial misconduct. Additionally, employees are required to maintain accurate and complete records of all financial transactions to support transparency and accountability. Participation in AML training programs is also mandatory to enhance awareness and compliance with AML regulations.

5. Governance of this Policy:

The governance of this AML policy is overseen by Zyeta's Senior Management Team, with support from the Ethics and Compliance Committee. The Compliance Officer is responsible for ensuring the effective implementation and monitoring of this policy, as well as liaising with regulatory bodies where applicable. Senior management is responsible for enforcing compliance, while the Ethics and Compliance Committee ensures that procedures are followed to prevent financial crimes. The policy will be integrated into Zyeta's broader corporate governance framework and reviewed periodically to ensure its effectiveness.

6. Anti- Money laundering Policy

6.1 Reporting Suspicious Transactions

If an employee identifies suspicious activity, it must be reported immediately to the Compliance Officer or through designated whistleblowing channels. The Compliance Officer will evaluate the situation and determine if further investigation is required. Should the activity be deemed suspicious, it will be reported to the relevant authorities in line with legal requirements. Employees are protected from retaliation when reporting in good faith. This reporting mechanism helps Zyeta maintain transparency and ensures that potential money laundering activities are detected and addressed promptly, safeguarding the company's reputation and regulatory standing.

6.2 Definition of Money Laundering

Money laundering is a process used to disguise the origins of illegally obtained funds, making them appear legitimate. It consists of three stages: Placement, where illicit funds are introduced into the financial system; Layering, where the source of the funds is concealed through complex transactions; and Integration, where the illicit funds are integrated into the economy through legitimate investments or businesses.

Money laundering undermines the financial system and exposes businesses to legal and reputational risks. Preventing it is essential for maintaining compliance with legal frameworks and upholding ethical business standards.

6.3 Know Your Customer (KYC) Procedures

To prevent money laundering, Zyeta will implement robust Know Your Customer (KYC) procedures. This includes verifying client and contractor identities, obtaining detailed business documentation, and understanding the source of their funds. The KYC process ensures that Zyeta engages only with legitimate parties by assessing their financial background and ownership structure. Ongoing monitoring of transactions and relationships is also crucial to detect suspicious activities. Due diligence is performed on high-risk clients, and any concerns are promptly reported to the Compliance Officer. This proactive approach helps minimize money laundering risks and ensures regulatory compliance.

6.4 Identifying Suspicious Activity

Certain behaviors may signal potential money laundering. These include clients or contractors who cannot explain the source of funds or are unwilling to provide information. Overly complex or roundabout transactions, especially with no clear business purpose, may also indicate suspicious activity.

Unusual patterns, such as high-value transfers with no legitimate explanation or small payments for large services, should be scrutinized. Additionally, clients or vendors who refuse to disclose essential information, such as their business operations, ownership, or financial background, should raise concern. Recognizing these red flags helps in preventing money laundering activities.

7. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Reporting Suspicious Transactions	Ensure employees report suspicious transactions promptly.	Percentage of suspicious transactions reported	100%(→)
2	Definition of Money Laundering	Ensure clear understanding of what constitutes money	Percentage of employees acknowledging the	100%(→)

		laundering within the organization.	definition of money laundering	
3	Know Your Customer (KYC) Procedures	Implement and ensure strict adherence to Know Your Customer (KYC) procedures.	Percentage of clients with completed KYC verification	100%(→)
4	Identifying Suspicious Activity	Train employees to identify and report suspicious activities that may be linked to money laundering.	Percentage of employees trained on identifying suspicious activity	100%(→)

8. Disciplinary Action for Policy Violations

Any employee, contractor, or partner found violating Zyeta’s Money Laundering Policy will face severe disciplinary action. Penalties for non-compliance may include termination, resulting in immediate dismissal from the company or termination of contracts for involvement in money laundering activities. Legal action will be pursued, including criminal charges for individuals found guilty of money laundering.

Additionally, Zyeta may face fines and penalties imposed by regulatory authorities if it is found to be complicit in money laundering activities. These actions emphasize Zyeta’s commitment to maintaining a lawful, transparent, and ethical business environment for all stakeholders.

9. Distribution

Zyeta’s Money Laundering Policy will be widely distributed to all employees, contractors, and relevant external partners to ensure full understanding and adherence. The policy will be incorporated into employee handbooks, onboarding programs, and shared via the company’s intranet for easy access. Additionally, employees will be required to acknowledge their understanding and commitment to the policy through signed statements. Regular training and awareness sessions will also be conducted to reinforce the policy's importance and provide updates on any regulatory changes. This distribution ensures that everyone associated with Zyeta is fully informed and accountable for preventing money laundering activities.

10. Annual Review

Zyeta's Money Laundering Policy will undergo an annual review to ensure its continued relevance, effectiveness, and compliance with evolving legal standards. The review will involve assessing the policy's alignment with domestic and international anti-money laundering regulations. During this process, management will evaluate the implementation and impact of the policy, identifying any gaps or areas for improvement. Any necessary updates or amendments will be made and communicated to all employees, contractors, and external partners. The annual review process ensures that Zyeta remains vigilant and adaptable in its approach to preventing money laundering and upholding ethical business practices.

11. Conclusion

The prevention of money laundering is vital to maintaining the integrity, transparency, and reputation of Zyeta. Through the implementation of robust internal controls, employee awareness, and compliance with legal and regulatory frameworks, we aim to prevent any involvement in money laundering activities. Zyeta's commitment to ethical business practices ensures that we provide value to our clients, stakeholders, and the community without engaging in or enabling illicit activities. By adhering to this Money Laundering Policy, we continue to uphold the highest standards of integrity and contribute to a sustainable and lawful business environment.

WHISTLE-BLOWER REPORTING POLICY ZYETA/ESG/P-12

1. Introduction

The objectives of the Whistleblowing System of Zyeta Interiors Private Limited (Zyeta) are to promote a fair, accountable, ethical, and professional work environment. The Whistleblowing System Policy enables whistle blowers to report various corporate and ethical irregularities and misconducts within the Company. The Policy also enables the Company to rectify any issues reported in a transparent and credible manner while protecting the whistle blowers from adverse treatment.

2. Scope of Application

2.1 Who is Covered: This policy applies to all employees, directors, consultants, vendors, suppliers, contractors, and any third party engaged with Zyeta.

2.2 Business Area or Operations Covered: This policy covers all business functions, including design consultation, project management services, and Building Information Modeling (BIM)-based operations.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Whistleblower

- Individuals reporting unethical behavior have a responsibility to provide as much detail as possible about the concern or incident.
- They must act in good faith and should not report issues based on hearsay or unfounded assumptions.

3.2 Management Team

- Ensuring that this policy is communicated effectively to all stakeholders.
- Reviewing and investigating any reports of misconduct.
- Taking appropriate corrective action where necessary.
- Maintaining confidentiality and providing non-retaliation guarantees.

3.3 Internal Audit/Compliance Officer

- The Compliance Officer or Internal Audit Team will be responsible for overseeing the implementation of the policy.
- They will review the reports, investigate the allegations, and ensure that all actions taken are in line with legal and ethical standards.
- They will report findings to the senior leadership of Zyeta.

3.4 HR Department

- Human Resources will be involved in investigating reports related to employee behavior and any violations by staff.
- Ensuring the protection of whistleblowers within the organization.

3.5 Third-Party Reporting Agency (if applicable)

- If Zyeta utilizes a third-party service for whistleblower reports, this entity will ensure the security and confidentiality of all reports made.

4. Application of the Policy

This policy applies to all suspected cases of fraud, corruption, conflicts of interest, workplace harassment, financial misstatements, data breaches, and violations of laws or ethical standards within ZYETA. It ensures accountability, promotes transparency, and provides a secure reporting mechanism to address and resolve concerns while protecting whistle-blowers from retaliation.

5. Governance of this Policy

The governance of this Whistle-blower Reporting Policy is overseen by Zyeta's Senior Management and the Ethics & Compliance Committee. The Audit Committee is responsible for reviewing and addressing reported concerns, ensuring appropriate investigations, and monitoring the resolution of reported issues. The policy ensures that all reports are taken seriously and are handled in a timely and efficient manner. The company will appoint a designated Whistle-blower Officer to manage and oversee the confidential receipt, documentation, and follow-up of all reports under this policy.

6. Reporting Obligations

Whistleblower may make reports anonymously, if they wish and must call or an email the Contact Point. When a Whistleblower reports an event, they must separate the objective and rational grounds from the implications of such grounds. The Whistleblower must not report ambiguous information such as rumors to be objective facts or use misleading expressions. Whistleblowers must not make false reports, and report events solely to benefit themselves or to abuse or defame someone. The Office will arrange to execute "Non-Disclosure Agreement" with the Whistleblower to safeguard reported information and proper investigation. Whistleblowers must cooperate with the investigation, including but not limited to, by responding to interviews and submitting supplies provided by the Company (such as documents and PCs), if requested to do so.

7. Whistleblower Protections

The Company will not adversely treat the Whistleblower in any way as a result of the report, unless the Whistleblower report events solely to benefit themselves or to abuse or defame any person. Company will not disclose to any third party any information related to identification of Whistleblower except required by public authorities and endeavor to prevent the identification of the Whistleblower, unless the consent is obtained from the Whistleblower.

8. Point of Contact

Whistleblowers willing to report an event within the scope of reporting should inform to tashi@Zyeta.com.

9. Whistle-blower Reporting Policy

9.1 Dedicated Reporting Channel:

Zyeta provides multiple channels to report unethical practices, ensuring accessibility and confidentiality. Internal reporting channels include a designated email address a contact person in HR and a hotline For further confidentiality, Zyeta also offers a third-party reporting system managed by a trusted external partner, available via a hotline and email.

This dedicated service ensures that whistleblowers can report concerns anonymously and securely, fostering a transparent and ethical workplace culture where all reports are taken seriously and handled appropriately.

9.2 Non-Retaliation Guarantee

Zyeta guarantees that no retaliatory actions will be taken against anyone who reports corruption, bribery, or unethical practices in good faith. Retaliation, including threats, harassment, discrimination, or adverse treatment, is strictly prohibited. Any such actions will be considered a serious violation of company policy and will lead to immediate disciplinary measures. This non-retaliation guarantee ensures that individuals feel safe and supported in raising concerns about unethical behavior, further reinforcing Zyeta’s commitment to integrity and accountability.

9.3 Confidentiality Guarantee

At Zyeta, all reports made under this policy will be treated with the utmost confidentiality. Personal information, including the identities of whistleblowers and the details of the report, will be safeguarded and only disclosed if required by law or regulatory authorities. We ensure that the confidentiality of the reporting process is maintained throughout, protecting the privacy and integrity of individuals involved. This confidentiality guarantee fosters an environment of trust and openness, encouraging employees and stakeholders to report unethical activities without fear of exposure.

10. ESG Objective

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Dedicated Reporting Channel	Provide a secure, dedicated channel for whistle-blower reports.	Percentage of employees aware of the reporting channel	100% (→)
2	Non-Retaliation Guarantee	Ensure protection from retaliation for individuals reporting concerns.	Percentage of reported cases with no retaliation	100% (→)
3	Confidentiality Guarantee	Ensure confidentiality for all whistle-blower reports.	Percentage of whistle-blower reports processed confidentially	100% (→)

11. Disciplinary Action for Policy Violations

Any employee, contractor, or stakeholder found violating this policy will face strict disciplinary action, which may include termination of employment, contract termination, or severance of business relationships, depending on the severity of the violation. Such violations undermine Zyeta's commitment to ethical conduct, and corrective measures will be taken to protect the organization's integrity. In cases where the violation involves illegal activities such as bribery or corruption, legal action may be pursued in accordance with applicable laws. ZYETA Zyeta is committed to upholding a zero-tolerance approach toward unethical behavior and ensuring that all individuals are held accountable for their actions.

12. Distribution

The Whistleblower Policy will be widely distributed to all employees, contractors, and relevant external stakeholders. It will be incorporated into the employee handbook, included in onboarding programs for new hires, and made available on the company's intranet for easy access. Regular training and awareness sessions will be conducted to reinforce the importance of the policy, ensuring that all stakeholders understand the reporting channels and their rights under the policy. Employees will be required to acknowledge their understanding of the policy and its provisions through signed statements, ensuring full awareness and compliance.

13. Annual Review

The Whistleblower Policy will undergo an annual review to ensure its continued relevance and effectiveness. This review will assess the policy's alignment with any changes in legal or regulatory requirements and its overall impact on the organization's ethical standards. Management will evaluate any reported incidents, identify trends, and make adjustments to improve reporting mechanisms or prevent retaliation. Feedback from employees and stakeholders will be considered to strengthen the policy and ensure that it remains an effective tool for maintaining transparency and accountability. Any updates or revisions will be communicated promptly to all involved parties.

14. Conclusion

Zyeta is dedicated to upholding the highest ethical standards across all business operations. Our Whistleblower Policy offers a clear, confidential, and secure method for reporting unethical behavior, such as corruption and bribery, ensuring transparency and integrity in all our activities. By protecting whistleblowers from retaliation, we promote a culture of accountability where ethical conduct is prioritized. We encourage all employees, contractors, and stakeholders to actively engage in safeguarding these values, ensuring that Zyeta continues to operate in a transparent and ethical manner. Together, we can maintain a trusted environment for all involved.

ANTI-HARASSMENT POLICY ZYETA/ESG/P-13

1. Introduction

Zyeta is committed to providing a safe, respectful, and inclusive workplace for all employees. We value diversity and do not tolerate discrimination or harassment of any kind. This policy applies to all employees, contractors, vendors, customers, and any other individuals who engage with Zyeta.

2. Scope of Application

2.1 Who: This policy applies to all employees, contractors, consultants, clients, vendors, and business partners associated with Zyeta.

2.2 Business Area or Operation Covered: This policy is applicable across all operations of ZYETA, including design consultation and project management services facilitated through Building Information Modeling (BIM).

2.3 Geographical Area Covered: It covers all the branches

3. Roles and Responsibilities

3.1 Management Responsibilities

Management plays a critical role in fostering a workplace free from harassment. They must ensure the proper implementation and strict enforcement of the Anti-Harassment Policy. Regular awareness programs and training sessions should be conducted to educate employees on expected behavior and legal implications. Confidential reporting mechanisms must be established to encourage employees to report incidents without fear. Any reported cases should be addressed promptly, ensuring impartiality and fairness in all decisions. Management must also lead by example, demonstrating a commitment to maintaining a professional and respectful work environment while continuously assessing and improving policies to meet evolving needs.

3.2 Employee Responsibilities

Employees are responsible for upholding a culture of respect and professionalism within the workplace. They must treat all colleagues, clients, and stakeholders with dignity, ensuring their actions align with company values. Engaging in any form of harassment verbal, physical, or psychological is strictly prohibited. Employees should promptly report any harassment they witness or experience, fostering a workplace of accountability and safety.

Cooperation during investigations is essential, including maintaining confidentiality to protect all parties involved. By adhering to these responsibilities, employees contribute to an inclusive, safe, and harassment-free environment where everyone feels valued and respected.

3.3 Human Resources (HR) Responsibilities

HR serves as the primary facilitator of the grievance redressed mechanism, ensuring that harassment cases are handled efficiently and fairly. They are responsible for maintaining accurate records of reported incidents, investigative findings, and resolution outcomes. Ensuring compliance with all legal frameworks and company policies is essential to safeguarding employee rights. HR should regularly review and update the Anti-Harassment Policy to reflect changes in laws and workplace dynamics. Additionally, HR must provide guidance and support to employees, fostering an environment where grievances can be addressed without fear of retaliation and reinforcing the organization's commitment to workplace integrity.

3.4 Investigation Committee Responsibilities

The Investigation Committee is responsible for conducting thorough, unbiased inquiries into harassment complaints. They must assess evidence impartially and ensure all parties receive a fair hearing. Recommendations for disciplinary actions should be based on factual findings and company policies. Confidentiality is paramount to protect complainants and witnesses from retaliation or undue pressure. The committee should also provide feedback to management on policy improvements. By maintaining a fair, transparent, and effective investigative process, the committee upholds the organization's commitment to a respectful workplace while ensuring that justice is served in all reported cases.

4. Application of the Policy

This policy covers all forms of harassment, including but not limited to sexual harassment, verbal, physical, or psychological abuse, discrimination based on gender, race, age, religion, disability, or any other protected status, and cyberbullying and online harassment.

5. Governance of this Policy

The governance of this policy is overseen by Zyeta's Senior Management in conjunction with the Human Resources (HR) Department. The HR Department is responsible for ensuring the implementation, monitoring, and enforcement of this policy. The Ethics & Compliance Committee may be involved when necessary to address complex cases. The policy will be reviewed annually to ensure its continued relevance and effectiveness.

6. Reporting Procedure

Any employee who experiences or witnesses' harassment is strongly encouraged to report it immediately to their supervisor, HR department, or any member of the management team. Zyeta will take all reports seriously, and all reports will be investigated promptly, thoroughly, and confidentially. Any employee who retaliates against a person who reports harassment will be subject to disciplinary action.

7. Responding to complaints

All reports describing conduct that is inconsistent with this policy will be investigated promptly and thoroughly. Employees are required to cooperate in investigations. The Company is committed to maintaining confidentiality to the extent possible. The Company will take all reasonable measures to ensure that the situation is divulged only to those with a need to know.

8. Consequences

Any employee found to have engaged in discrimination or harassment will be subject to disciplinary action, up to and including termination of employment. Zyeta takes allegations of discrimination and harassment very seriously and will take appropriate action to ensure that such behaviour does not occur in the workplace.

9. Training

Zyeta will provide regular training on non-discrimination and anti-harassment policies to all employees to ensure that everyone is aware of their rights and responsibilities and to promote a safe and respectful work environment.

10. Anti-Harassment Policy

Zyeta strictly prohibits any form of harassment, including but not limited to, sexual harassment, verbal harassment, physical harassment, and visual harassment. Harassment herewith means and defined as any unwelcome conduct that creates an intimidating, hostile, or offensive working environment. Sexual harassment herewith means and defined as any unwanted sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that is unwelcome or creates a hostile work environment. Verbal harassment herewith means and defined as any derogatory or discriminatory remarks, slurs, jokes, or other verbal conduct that is offensive, humiliating, or intimidating.

Physical harassment herewith means and defined as any physical conduct, including touching, that is unwanted, unwelcome, or offensive. Visual harassment herewith means and defined as any offensive visual material, such as posters, photographs, or cartoons that create a hostile work environment.

10.1 Workplace Culture Enhancement

Zyeta is committed to continuously improving workplace culture by fostering inclusivity, respect, and safety. Regular employee feedback, workplace climate surveys, and compliance audits will be conducted to identify areas for improvement. Open forums and engagement initiatives will encourage employees to voice concerns and suggest enhancements. Zyeta will also assess trends in harassment cases to strengthen preventive measures. Management will lead by example, promoting ethical behavior and inclusivity across all levels of the organization. By proactively evaluating and evolving workplace policies, Zyeta ensures a dynamic, harassment-free, and employee-centric work environment

10.2 Reporting and Complaint Mechanism

Zyeta provides multiple channels for employees to report harassment, including direct communication with a designated HR officer, email, and an anonymous reporting system. This ensures accessibility and encourages employees to come forward without fear. All complaints will be acknowledged within 48 hours, demonstrating the company's commitment to prompt action. Investigations will be initiated within five working days and conducted with utmost confidentiality. Findings will determine the necessary disciplinary actions, ensuring a fair resolution process. By maintaining transparency and efficiency in handling complaints, Zyeta reinforces a workplace culture where employees feel safe and supported in reporting harassment.

10.3 Training and Awareness Programs

Zyeta mandates comprehensive anti-harassment training for all employees during onboarding to establish clear behavioral expectations. Regular refresher courses and awareness workshops will be conducted to reinforce a harassment-free workplace culture. Managers and supervisors will receive specialized training on handling harassment complaints, ensuring they respond appropriately and effectively. These programs will cover legal aspects, reporting mechanisms, and bystander intervention strategies. Through continuous education, Zyeta ensures that all employees understand their rights, responsibilities, and the company's commitment to a respectful and inclusive work environment, reducing the risk of harassment and promoting a culture of accountability.

10.4 Handling False Allegations

While Zyeta encourages employees to report genuine harassment incidents, it also upholds a zero-tolerance policy against false accusations made with malicious intent. False allegations undermine the integrity of the complaint process and can harm the reputations of innocent employees. If an investigation determines that a complaint was deliberately fabricated, the accuser may face disciplinary actions, including verbal or written warnings, suspension, or termination. However, Zyeta recognizes that complaints made in good faith, even if unsubstantiated, will not result in penalties. This ensures fairness in addressing harassment concerns while preventing the misuse of the reporting system.

10.5 Confidentiality and Non-Retaliation

Zyeta upholds strict confidentiality in all harassment complaints and investigations to protect the identities of involved parties. Any information related to reported cases will be shared only with those directly responsible for the resolution process. Retaliation against employees who report harassment in good faith is strictly prohibited. Those found engaging in retaliatory behavior will face disciplinary actions, including warnings, suspension, or termination. This policy ensures that employees can report misconduct without fear of retribution, fostering a safe and supportive workplace where fairness, accountability, and trust are integral to the grievance resolution process.

10.6 Harassment During Work-Related Travel

Zyeta extends its Anti-Harassment Policy to work-related travel, ensuring employees are protected during business trips, conferences, and off-site assignments. Any form of harassment occurring in hotels, during transit, or at client locations must be reported immediately through the designated channels. Zyeta commits to investigating such complaints with the same diligence as workplace incidents and will take necessary actions to support affected employees. Employees traveling for work must adhere to professional conduct, and Zyeta expects external partners and stakeholders to do the same. This policy ensures that safety and dignity are upheld beyond office premises.

10.7 Third-Party Harassment

Zyeta is committed to protecting employees from harassment by third parties, including clients, vendors, suppliers, and external partners. Harassment from non-employees is taken seriously and will be addressed through formal complaints and necessary interventions.

If a client or vendor is found guilty of harassment, Zyeta may issue warnings, restrict interactions, or terminate business contracts. Employees are encouraged to report any misconduct from third parties, ensuring their safety and well-being. By enforcing this policy, Zyeta demonstrates its commitment to creating a respectful work environment, not just internally but also in external business relationships.

10.8 Digital Workplace Harassment

With increasing reliance on digital communication, Zyeta recognizes the importance of preventing cyber harassment. Employees must use emails, messaging platforms, and virtual meeting tools professionally and respectfully. Harassment in digital spaces, including inappropriate messages, online bullying, unauthorized sharing of personal data, and misuse of company resources, will be treated with the same seriousness as in-person offenses. Zyeta will monitor and address such cases through its reporting mechanisms, ensuring prompt investigations and appropriate disciplinary actions. By acknowledging the challenges of a digital workplace, Zyeta reinforces a harassment-free environment across all professional interactions, both online and offline.

10.9 Support for Affected Employees

Zyeta prioritizes the well-being of employees affected by harassment by providing comprehensive support services. Affected individuals will have access to professional counseling, legal guidance, and necessary workplace accommodations to ensure their recovery and job security. The company ensures a non-discriminatory work environment where victims do not face professional setbacks due to their complaints. Zyeta also facilitates peer support programs to help employees cope with workplace challenges. By offering these resources, Zyeta fosters a compassionate and safe work culture, empowering employees to speak up against harassment while ensuring their mental and emotional well-being.

11. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025-March 2026
1	Workplace Culture Enhancement	Foster a respectful and inclusive workplace culture.	Percentage of employees reporting a positive workplace culture	95%(↑)

2	Reporting and Complaint Mechanism	Ensure employees can report harassment easily and confidentially.	Percentage of employees aware of reporting mechanisms	100%(→)
3	Training and Awareness Programs	Train all employees on anti-harassment policies and procedures.	Percentage of employees completing anti-harassment training	100%(→)
4	Handling False Allegations	Ensure a clear procedure for handling false allegations of harassment.	Percentage of cases with documented investigation results	95%(↑)
5	Confidentiality and Non-Retaliation	Guarantee confidentiality and protection from retaliation for complainants.	Percentage of complaints handled confidentially and without retaliation	90%(↑)
6	Harassment During Work-Related Travel	Prevent harassment during work-related travel and ensure support for victims.	Percentage of employees receiving training on travel-related harassment	100%(→)
7	Third-Party Harassment	Address harassment by third parties (e.g., clients, vendors).	Percentage of third-party interactions covered under anti-harassment policy	95%(↑)
8	Digital Workplace Harassment	Address and prevent harassment in digital and remote workspaces.	Percentage of employees aware of digital harassment policies	100%(→)
9	Support for Affected Employees	Provide adequate support for employees affected by harassment.	Percentage of affected employees receiving support services	95%(↑)

12. Disciplinary Action for Policy Violations

Zyeta enforces strict disciplinary measures against employees found guilty of harassment. Actions will be determined based on the severity of the violation and may include verbal or written warnings, suspension, demotion, or termination of employment. Serious offenses may lead to legal action as per applicable laws. Retaliation against complainants or witnesses will also result in disciplinary consequences. Zyeta ensures that all actions are fair, unbiased, and in line with due process. By maintaining a zero-tolerance approach, Zyeta reinforces its commitment to a respectful, safe, and inclusive workplace where misconduct is addressed swiftly and effectively.

13. Distribution

Zyeta ensures that the Anti-Harassment Policy is effectively communicated to all employees, stakeholders, and third parties. The policy will be included in employee handbooks, on boarding materials, and displayed on internal communication platforms. Regular reminders and updates will be shared through emails and awareness sessions. Managers and HR personnel will be responsible for ensuring employees understand the policy and its implications. Third-party vendors, clients, and contractors will also be informed of Zyeta's zero-tolerance approach to harassment. By making the policy easily accessible and widely distributed Zyeta reinforces its commitment to fostering a safe and respectful work environment.

14. Annual Review

Zyeta will conduct an annual review of the Anti-Harassment Policy to ensure it remains relevant, effective, and compliant with evolving legal and organizational requirements. Feedback from employees, HR reports, and grievance data will be analyzed to identify areas for improvement. Changes, if necessary, will be made in consultation with legal advisors and management. Updated policies will be communicated to employees through training sessions and official notifications. Regular audits and assessments will also be conducted to measure the policy's impact. By reviewing the policy annually, Zyeta demonstrates its commitment to continuous improvement and a harassment-free workplace.

15. Conclusion

Zyeta is committed to fostering a safe, respectful, and inclusive work environment where harassment in any form is not tolerated. Through clear policies, reporting mechanisms, strict disciplinary actions, and continuous training, Zyeta ensures that all employees feel protected and empowered. The company encourages open communication, accountability, and proactive measures to prevent harassment. By regularly reviewing and improving the policy, Zyeta upholds its commitment to workplace integrity. Every employee, manager, and stakeholder has a role in maintaining a culture of dignity and respect, ensuring that Zyeta remains a workplace where professionalism and ethical conduct are prioritized.

NON-DISCRIMINATION POLICY ZYETA/ESG/P-14

1. Introduction

Zyeta Interiors Private Limited (Zyeta) is committed to providing a safe, respectful, and inclusive workplace for all employees. We value diversity and do not tolerate discrimination of any kind. This policy applies to all employees, contractors, vendors, customers, and any other individuals who engage with Zyeta.

2. Scope of Application

2.1 Who: This policy applies to all employees, contractors, consultants, clients, vendors, and stakeholders associated with Zyeta.

2.2 Business Area or Operation Covered: This policy covers all aspects of Zyeta's operations, including recruitment, promotions, compensation, project management, and workplace conduct.

2.3 Geographical Area Covered: It covers all the branches.

3. Roles and Responsibilities

3.1 Management Responsibilities

Management plays a crucial role in upholding Zyeta's commitment to equal opportunity. They must implement and enforce equality principles across all business operations, ensuring that employment decisions, including hiring, promotions, and compensation, are based on merit and business needs rather than personal biases. A culture of inclusion and fairness should be actively promoted through policies, leadership behavior, and workplace initiatives. Management must allocate resources for training programs that educate employees on workplace equality and anti-discrimination practices. By fostering an inclusive environment and holding individuals accountable, leadership ensures that Zyeta remains a fair, diverse, and discrimination-free workplace.

3.2 Employee Responsibilities

Employees at Zyeta are expected to uphold the values of fairness, respect, and inclusivity in all workplace interactions. They must treat colleagues, clients, and stakeholders with dignity, avoiding any form of discrimination, favoritism, or biased behavior. Employees should actively participate in training programs to enhance their understanding of workplace equality and contribute to an inclusive culture.

If they witness or experience discrimination, they are encouraged to report incidents through appropriate channels without fear of retaliation. By taking responsibility for fostering a respectful work environment, employees help ensure that Zyeta maintains a diverse and fair workplace for all.

3.3 Human Resources (HR) Responsibilities

HR is responsible for implementing and overseeing fair recruitment, hiring, and promotion policies to ensure equal opportunity for all employees. They must handle discrimination complaints impartially, conducting thorough investigations and taking appropriate corrective measures. HR should maintain records of workplace diversity initiatives, compliance reports, and actions taken to address any bias-related concerns. Regular assessments and audits must be conducted to evaluate the effectiveness of Zyeta's equal opportunity initiatives. By proactively addressing discrimination and fostering an inclusive culture, HR ensures that the company complies with legal requirements and upholds the principles of fairness and workplace equality.

3.4 Investigation Committee Responsibilities

The Investigation Committee is responsible for handling reported cases of discrimination, bias, or unfair treatment in a neutral and objective manner. They must assess complaints thoroughly, gathering evidence and ensuring due process is followed. Confidentiality must be maintained to protect complainants from retaliation or adverse consequences. The committee is tasked with recommending corrective actions, including policy changes, disciplinary measures, or mediation, to resolve cases effectively. Regular training on impartial investigations and bias mitigation is essential for committee members. By ensuring fair and transparent case handling, the committee reinforces Zyeta's commitment to maintaining an equitable and inclusive workplace.

4. Application of the Policy

The policy applies to hiring, promotions, compensation, training, project assignments, and termination. Any form of discrimination based on race, gender, age, religion, disability, sexual orientation, nationality, or any other protected characteristic is strictly prohibited. All employees must participate in non-discrimination training annually.

5. Governance of this Policy

This policy is overseen by Zyeta's Senior Management, with direct responsibility for implementation assigned to the Human Resources (HR) Department. The HR Department ensures the policy is well-communicated, implemented, and adhered to throughout the organization. In addition, the Diversity, Equity & Inclusion (DEI) Committee may be involved in ensuring that non-discrimination practices align with Zyeta's commitment to diversity and inclusion.

6. Reporting Procedure

Any employee who experiences or witnesses' discrimination or harassment is strongly encouraged to report it immediately to their supervisor, HR department, or any member of the management team. Zyeta will take all reports seriously, and all reports will be investigated promptly, thoroughly, and confidentially. Any employee who retaliates against a person who reports discrimination or harassment will be subject to disciplinary action.

7. Responding to complaints

All reports describing conduct that is inconsistent with this policy will be investigated promptly and thoroughly. Employees are required to cooperate in investigations. The Company is committed to maintaining confidentiality to the extent possible. The Company will take all reasonable measures to ensure that the situation is divulged only to those with a need to know.

8. Consequences

Any employee found to have engaged in discrimination or harassment will be subject to disciplinary action, up to and including termination of employment. Zyeta takes allegations of discrimination and harassment very seriously and will take appropriate action to ensure that such behaviour does not occur in the workplace.

9. Training

Zyeta will provide regular training on non-discrimination and anti-harassment policies to all employees to ensure that everyone is aware of their rights and responsibilities and to promote a safe and respectful work environment.

10. Non-discrimination Policy

Zyeta prohibits discrimination on the basis of race, color, religion, national origin, age, gender, sexual orientation, gender identity, gender expression, disability, veteran status, or any other legally protected characteristic. All employees are expected to treat each other with respect and fairness, and to avoid any actions that could be perceived as discriminatory

10.1 Workplace Accessibility and Accommodations

Zyeta is committed to creating an accessible and inclusive workplace for employees with disabilities. The company ensures that office spaces, facilities, and digital resources are designed to accommodate diverse needs. Reasonable adjustments, such as ergonomic workstations, assistive technologies, and flexible work arrangements, will be provided to support employees requiring accommodations.

HR will work closely with individuals to assess and implement necessary modifications without discrimination. By prioritizing accessibility, Zyeta fosters an inclusive work culture where all employees, regardless of physical or cognitive challenges, can contribute effectively, perform at their best, and feel valued in their roles.

10.2 Addressing Discrimination and Complaints

Zyeta encourages employees to report any instances of discrimination or unfair treatment through multiple channels, including HR, an anonymous complaint system, or direct management. Complaints will be handled with strict confidentiality, ensuring that affected individuals feel safe and supported throughout the process. Investigations will be conducted fairly, and appropriate corrective actions will be taken against policy violators. Zyeta strictly prohibits retaliation against employees who raise concerns in good faith, reinforcing a culture of accountability and trust. By maintaining a transparent and effective grievance mechanism, Zyeta ensures a workplace where fairness, respect, and equal opportunity are upheld.

10.3 Non-Discrimination in Recruitment and Hiring

Zyeta is committed to fair and unbiased recruitment practices, ensuring that job advertisements, selection criteria, and interview processes are free from discrimination. Candidates are evaluated solely based on their skills, qualifications, and experience, eliminating any bias related to gender, age, ethnicity, disability, or other protected characteristics. The company also provides reasonable accommodations for applicants with disabilities to ensure equal access to job opportunities. By maintaining a transparent and inclusive hiring process, Zyeta fosters a diverse workforce and upholds its commitment to equal opportunity, ensuring that every applicant is treated with fairness and respect throughout the recruitment process.

10.4 Career Development and Promotions

Zyeta provides employees with equal access to career development opportunities, including training programs, mentorship, and leadership development initiatives. Promotions and career advancements are based on performance, qualifications, and contributions rather than personal biases or discriminatory factors. The company ensures that growth opportunities are available to all employees, regardless of gender, age, ethnicity, or background. Regular performance evaluations are conducted to identify talent and recognize achievements fairly. By fostering a merit-based promotion system, Zyeta encourages professional growth, enhances workplace motivation, and builds a culture where all employees have an equal chance to succeed and advance in their careers.

10.5 Equal Pay and Fair Compensation

Zyeta upholds a fair compensation system that ensures employees receive equal pay for equal work, free from wage disparities based on gender, race, or other non-merit-based factors. Salaries, bonuses, and benefits are determined based on job responsibilities, performance, industry benchmarks, and experience. Regular salary reviews are conducted to maintain equity and competitiveness in the market. Zyeta also ensures transparency in compensation policies, fostering trust and accountability. By prioritizing fair pay practices, Zyeta strengthens employee morale, reduces income inequality, and reinforces its commitment to an equitable workplace where all employees are rewarded based on their contributions.

11. ESG Objectives

Sl. No.	Sustainability Issue	Objective	Measure	Target Value for April 2025- March 2026
1	Workplace Accessibility and Accommodations	Ensure workplace accessibility and accommodations for all employees.	Percentage of employees with necessary accommodations	95% (↑)
2	Addressing Discrimination and Complaints	Address all discrimination complaints efficiently and fairly.	Percentage of discrimination complaints addressed within set timelines	100% (→)
3	Non-Discrimination in Recruitment and Hiring	Ensure no discrimination in recruitment and hiring processes.	Percentage of recruitment processes free from discrimination	90% (↑)
4	Career Development and Promotions	Ensure equal career development and promotional opportunities.	Percentage of employees with equal career development access	98% (↑)
5	Equal Pay and Fair Compensation	Ensure equal pay for equal work, regardless of gender, race, etc.	Percentage of employees receiving equal pay for equal work	100% (→)

12. Disciplinary Action for Policy Violations

Zyeta enforces strict disciplinary measures against individuals who violate the Non-discrimination policy. Depending on the severity of the violation, consequences may include verbal or written warnings, mandatory training, suspension, demotion, or termination of employment. Serious infractions may result in legal action in accordance with applicable laws. Retaliation against employees who report discrimination will also lead to disciplinary action.

Zyeta ensures that all investigations are conducted fairly and transparently, with due process for all parties involved. By holding violators accountable, Zyeta reinforces its commitment to maintaining a workplace that upholds equality, fairness, and inclusivity for all employees.

13. Distribution

Zyeta ensures that the Non-discrimination policy is effectively communicated to all employees, stakeholders, and third parties. The policy will be included in employee handbooks, onboarding materials, and company portals for easy access. Regular reminders through emails, training sessions, and workplace posters will reinforce awareness.

Managers and HR personnel will be responsible for ensuring that all employees understand the policy and its implementation. Third-party vendors, clients, and contractors will also be informed about Zyeta's commitment to equal opportunity. By making the policy widely available, Zyeta fosters a culture of inclusivity and ensures compliance at all organizational levels.

14. Annual Review

Zyeta will conduct an annual review of the Non-discrimination policy to ensure its effectiveness and alignment with legal and organizational requirements. HR and management will analyze feedback from employees, workplace diversity reports, and any discrimination complaints to identify areas for improvement. Adjustments to policies or procedures will be made as necessary to enhance inclusivity and fairness.

Any revisions will be communicated to employees through official updates and training sessions. Regular assessments and audits will also be conducted to measure the policy's impact. By reviewing the policy annually, Zyeta reaffirms its commitment to continuous improvement and workplace equality.

15. Conclusion

Zyeta is dedicated to fostering a workplace where diversity, inclusion, and Non-discrimination policy are upheld at every level. Through clear policies, transparent processes, and continuous education, Zyeta ensures that all employees are treated with fairness and respect. The company actively promotes a work culture where merit, skills, and performance define professional growth, free from discrimination or bias. Employees, management, and stakeholders share the responsibility of maintaining this culture. By regularly reviewing policies and addressing concerns proactively, Zyeta reinforces its commitment to an equitable work environment where everyone has the opportunity to succeed and thrive.

Acknowledgement of Receipt for Policy

I hereby acknowledge that I have received a copy of the Policy. I understand that it is my responsibility to thoroughly read the contents of the Policy and adhere to the policies, rules, and regulations outlined therein.

By signing below, I confirm my commitment to comply with the principles and guidelines stated in the Policy.

Signature

:



Name

: Neha Clare Hero | Human Resource Business Partner

Date

: 5th February, 2024