

Human Rights Policy

1. Objective

- a. To recognize and acknowledge our commitment to internationally recognized human rights principles and standards
- b. To ensure diversity, equity and inclusion within our organization
- c. To ensure a workplace free of discrimination, where everyone brings their whole selves to work
- d. To ensure that no human rights violations of any sort can occur, knowingly or unknowingly, across the range of our operations and value chain.
- e. To ensure that no human rights violation of any sort can occur, knowingly or unknowingly, in accordance with the adopted standards and the scope of this policy.
- f. To ensure that employees are provided the necessary training and awareness on our Human Rights policy and engage with our stakeholders to raise awareness among them
- g. To ensure that the coverage of training on human rights is tracked and forms an important KPI, as part of our compliance towards our commitment to respecting and upholding human rights.

2. Scope & Applicability

The Policy covers the following issues that are relevant to our business, and is applicable to all our employees, business partners and other relevant parties.

- Safe & healthy workplace
- Workforce diversity
- Equal opportunity
- Fair practices in employee life cycle
- Compensation & benefits
- Redressal mechanisms

3. Our Approach

Axis Bank is one of the leading India-focused financial institutions. In our operations, we strive to ensure a fair and equitable environment for all. This is embodied in our 'Dil se Open' philosophy. It is our constant endeavor to create a work environment that is built on trust and transparency where everyone is able to bring their whole selves to work without the fear of discrimination or disparity.

We extend this thinking to our value chain partners as well and strive to ensure that as a company, when we enter into relationships with individuals and entities that, apart from

being technically qualified and commercially viable, also mirror our ethos of customer centricity, ethics, transparency, teamwork and ownership.

Our biggest impact manifests through the organizations we finance, which is why we are equally committed to supporting businesses that are ethical and responsible. Our existing policy framework aids us in this approach by outlining the standards we encourage or expect our clients to align with.

In addition to this policy statement, our approach is further strengthened by our existing policy framework, which caters to various segments of our business. Our Sustainable Lending Policy and Principles (SLPP) has been developed using appropriate industry-wide benchmarks, such as the IFC Performance Standards and Equator Principles, which imbibe within them principles of human rights and its various elements that integrate into our lending decisions.

All employees are required to adhere to our Code of Conduct which mandates tenets for them to follow. These include aspects on fair and equitable treatment of co-workers and other stakeholders that they interact with.

In line with our commitment to provide our employees a safe workplace, we have the Prevention of Sexual Harassment at the Workplace (POSH) Policy and the Diversity, Equity and Inclusion Policy, respectively.

We have established a robust Whistleblower Policy and vigil mechanism at the Bank that is overseen by the Board. Our Whistleblower Policy is available for all our stakeholders to report any suspected or actual occurrence of illegal, unethical or inappropriate actions, including – but not limited to – human rights violations.

These policies represent, in the truest sense, our intent to conduct our business with the highest standard of ethics, integrity and social responsibility.

We remain committed to building on our current policies and practices to remain responsive to our dynamic organizational environment and any emerging expectations of our stakeholders.

4. Areas Covered

a. Diversity, equity and inclusion

Axis Bank is committed to a culture that is rich in diversity, is equitable with respect to every individual's life journey, and where every individual is able to thrive in an environment that fosters inclusion. Externally, we are constantly working to ensure that

our facilities are inclusive and accessible for our customers and other stakeholders, and make necessary accommodations based on unique needs and circumstances.

b. Non-discrimination and Equal Opportunity

Axis Bank is committed to ensuring that our workplace is free of discrimination and prejudice. In keeping with the same, we adhere to, and regularly update specific metrics to ensure fairness in our decisions related to hiring, promotion, remuneration and benefits. We shall adhere to all relevant laws and regulations and provide equal opportunity for professional growth to the Bank's employees. Axis Bank strives to being fair and equal in all our interactions with our customers and value chain partners.

c. Harassment-Free Workplace

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

d. Healthy & safe working environment

Axis Bank is committed to providing everyone with a safe and healthy workplace. We are focused on inculcating a culture of awareness surrounding health and safety.

e. Prohibition of child and forced labour

At Axis Bank, we have zero tolerance towards any form of child or forced form of labour. We are committed to ensuring no such instances of child or forced labour occur in any of our operations. These policies also apply to our value chain partners.

5. Consultation and Feedback

All relevant stakeholders will be consulted on an annual basis (or as needed) to seek feedback on the policy. Additionally, any grievances related to violations of human rights can be reported on harish.iyer@axisbank.com

6. Review and Governance

This policy draws on the strengths of various international human rights frameworks, which guide us on best practices to respect and support all our stakeholders. It is further supplemented by the policies listed in Annexure 2, which are aimed at protecting the interests of various stakeholders. The Bank has formed a Sustainability and Inclusion Council that reports to the Bank's ESG Steering Committee, which has been tasked with overseeing the implementation of this Human Rights Policy.

7. Effective Date

This policy is effective from 01st April, 2021 and supersedes all prior guidelines on the subject matter

8. Confidentiality Note

This document is not for general distribution and is meant for use only by the person/persons they are specifically issued to. This document shall not be loaned or given to anyone outside Axis Bank Ltd. and its subsidiary companies. Copying or unauthorized distribution of this document, in any form or means including electronic, mechanical, photocopying or otherwise is illegal.

9. Revision History

This policy document will be reviewed by the Policy Owner on an annual basis from the last review date.

Version	Review Date	Policy Owner	Authored by	Reviewed/Proposed by	Approved by	Change description
5.1.0	01.01.2020	Pramit Sen (VP-HR)	Ravi Singh (AVP-HR)	Suraj Kumar (SVP-HR)	Management	Format Change
6.1.0	15.03.2021	Vaijayanti Naik (SVP-HR)	Harish Iyer (DVP-DE&I), Ravi Singh (AVP-HR)	Vaijayanti Naik (SVP-HR)	Management	Revised Policy

Annexure 1: Reference Frameworks

- The OECD Guidelines for Multinational Enterprises
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Global Compact Principles
- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- United Nations Convention on the Elimination of Discrimination against Women

Annexure 2: Policy Linkage

- Sustainable Lending Policy & Procedures
- Privacy Policy
- Code of Commitment to Customers
- Customer Rights Policy
- Code of Conduct and Conflict of Interest Norms in Respect of Board of Directors
- Code of Conduct and Ethics
- Diversity, Equity and Inclusion Policy
- Prevention of Sexual Harassment at the Workplace Policy
- Equal Employment Opportunity Policy
- Policy on Safety for Women at Workplace
- Vendor Management Framework
- Corporate Social Responsibility Policy
- Whistleblower Policy