

Revision 1  
Dated 1<sup>st</sup> January 2019



**MILLENNIUM AERO DYNAMICS PVT. LTD.**

**HUMAN RIGHTS POLICY**

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## Introduction

Our success as a company is built upon a foundation of integrity – a longstanding commitment to act with the highest ethical standards and to conduct business honestly and legally. Respect for human rights is a fundamental value of Millennium Aero Dynamics Pvt Ltd.

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers and customers. Our aim is to help increase the enjoyment of human rights within the communities in which we operate.

This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work. This policy applies to Millennium Aero Dynamics Pvt Ltd, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. The Company also expects independent agents and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

We use due diligence as a means to identify and prevent human rights risks to people in our business and value chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties. The Human Rights Policy is overseen by senior management and board which includes the Chief Executive Officer.

Thank you,

**Milan R Zatakia**  
Chairman and Chief Executive Officer  
Millennium Aero Dynamics Pvt Ltd.

## Provisions

This Policy is derived from:

- The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights;
- The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work; and
- The United Nations Global Compact. Together, for the purposes of this Policy, the above documents are called the "International Human Rights Declarations".

Millennium Aero Dynamics Pvt Ltd. recognises the valuable role that business can play in the longer-term protection of human rights. The Group Companies are committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognised frameworks.

## Health and Safety

1. Millennium is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures that promote our philosophy of Safe Sustainable Progress.
2. Developing goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities.
3. Millennium is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate

## Labour

1. Aligning our existing policies, processes and activities with our commitment to respect human rights, including those that apply to labour practices, engagement with indigenous peoples; land acquisition, supply chain, and security management
2. Prohibiting interference in any way with the establishment, functioning or administration of workers' organisations or collective bargaining
3. Millennium opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. We will undertake work with our subcontractors and suppliers including due diligence within our supply chains to avoid indirectly benefitting from or promoting such illegal practices.
4. Millennium opposes the use of child labour. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child.
5. Millennium is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination

## Local Communities

1. Valuing diversity, equal opportunity and the need to consider the rights of vulnerable groups such as indigenous peoples, women, migrant workers and other minorities
2. Prohibiting all forms of harmful child labour, forced / trafficked labour, discrimination and harassment
3. Prohibiting any contribution to armed conflict or human rights abuses in conflict-affected and high-risk areas.

## Awareness, Education & Training

1. Promoting awareness of the human rights with employees at various levels of our operations through training and communication
2. Engaging with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities
3. Providing access to remedy by resolving grievances in a timely and culturally appropriate manner;
4. Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks
5. Continually improving human rights performance by sharing good practices and learnings, setting and reviewing targets, and monitoring performance.

## Implementation

The Company's implementation of this Human Rights Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time.

In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the senior executive responsible for the relevant business segment as soon as possible, and share this information with the line managers/ HR Team.

This Policy is endorsed by the Millennium Board of Directors. Millennium will share best practices between our operating units on rights-based grievance mechanisms, with the aim of establishing effective channels for redress for local stakeholders in relation to this Policy.

## Review and Monitoring

Millennium Aero Dynamics aims to implement this policy throughout its operations. This policy shall be reviewed periodically for its suitability and updated as necessary.