CHRYSALIS SERVICES · POLICY

Human Rights Protection Policy

Our commitment to respect the rights of our people, the communities we engage and the people in our value chain

Legal entity	Chrysalisis Services Private Limited ("Chrysalis Services" or "the Company") CIN U74140TN2020PTC134552 · Registered office: Chennai, Tamil Nadu
Version	Version 1.0
Policy owner	Human Resources (Sarutha Narayanan, Senior Executive – HR)
Review cycle	Annually, or earlier if the law or our operations change. Next review due by November 2027.
Applies to	All employees, interns, directors, consultants, associates and field investigators; covers our conduct towards communities, beneficiaries, donors, clients, partners and suppliers.

1. Policy statement

Chrysalis Services works at the meeting point of business and society. We help companies and foundations design, manage and assess programmes that reach some of the most marginalised communities in India. Respect for human rights is therefore not only a legal and ethical obligation for us, but a condition for doing our work well. We cannot credibly help others create social value if we do not respect the dignity and rights of our own people, the communities we engage, and the people who work in our value chain.

The Company commits to respect and promote internationally recognised human rights, to avoid causing or contributing to adverse human rights impacts through its own activities, to seek to prevent or mitigate impacts that are directly linked to its services or business relationships, and to provide for or cooperate in remedy where harm occurs.

2. Reference frameworks

This Policy is guided by the following laws and frameworks:

- the Constitution of India, in particular the Fundamental Rights, and applicable Indian laws, including the four Labour Codes in force from 21-11-2025, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Rights of Persons with Disabilities Act, 2016, the Protection of Children from Sexual Offences Act, 2012 and the Digital Personal Data Protection Act, 2023;
- the Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the ILO Declaration on Fundamental Principles and Rights at Work, covering freedom of association and collective bargaining, the elimination of forced labour, the abolition of child labour, the elimination of discrimination in employment, and a safe and healthy working environment;
- the United Nations Convention on the Rights of the Child; and

- the National Guidelines on Responsible Business Conduct issued by the Ministry of Corporate Affairs, in particular Principle 5, which provides that businesses should respect and promote human rights.

Where Indian law and these frameworks set different standards, the Company will follow the higher standard to the extent that doing so does not contravene Indian law.

3. Scope

This Policy applies to all employees, interns, directors, consultants, associates, freelancers and field investigators of the Company, and covers the Company's conduct towards the following groups of rights-holders:

Rights-holders	How our work affects them
Our people	Employees, interns, associates and field investigators, whose working conditions, safety, privacy and opportunities we directly control.
Communities and beneficiaries	Women, men and children, including people in vulnerable situations, who participate in our assessments, studies and programme activities, or whose lives are affected by programmes we design and recommend.
Partners and suppliers	Workers of NGO partners, implementing agencies, field agencies and vendors who work with us or on our engagements.
Clients and donors	The people in client and donor organisations with whom we work, and the stakeholders of the programmes they fund.

4. Our commitments as an employer

4.1 No forced, bonded or compulsory labour

All work at the Company is voluntary. The Company does not use forced, bonded, compulsory or trafficked labour, does not retain identity documents, educational certificates or wages as a means of compelling work, and does not impose unreasonable restrictions on any person's freedom to resign in accordance with the terms of their engagement.

4.2 No child labour

The Company does not employ or engage any person below the age of eighteen years in any capacity, including as an intern, enumerator or helper. Age will be verified at the time of engagement.

4.3 Fair wages and working hours

The Company pays wages that meet or exceed the minimum wages applicable under law, pays them on time and in full, makes statutory deductions and contributions correctly, and provides every employee with clear written information about their terms of employment and pay. Working hours, rest days, leave and overtime will comply with applicable law. Equal remuneration will be paid for the same work or work of a similar nature, without discrimination on the ground of gender.

4.4 Equal opportunity and non-discrimination

Decisions on recruitment, compensation, development, promotion, discipline and separation will be based on merit and on the requirements of the role. The Company prohibits discrimination on the grounds of gender, caste, religion, race, ethnicity, region, language, age, disability, HIV status, marital

status, pregnancy, sexual orientation, gender identity, political opinion or any other status protected by law. The Company will provide reasonable accommodation to persons with disabilities.

4.5 Dignity, safety and freedom from harassment

Every person has the right to work in an environment free from harassment, bullying, intimidation and violence. Sexual harassment is addressed through the Company's POSH Policy and its Internal Committee. The Company will take reasonable steps to protect the health, safety and wellbeing of its people, including those who work remotely and those who travel for fieldwork, with particular attention to the safety of women travelling to remote locations.

4.6 Freedom of association and voice

The Company respects the right of its employees to form and join associations of their choice, to engage in collective bargaining in accordance with law, and to raise concerns about their working conditions without fear of retaliation.

4.7 Maternity, caregiving and wellbeing

The Company provides maternity benefits and related protections in accordance with law and its Leave Policy, and will not treat any person less favourably on account of pregnancy, maternity or caregiving responsibilities.

4.8 Privacy

The Company respects the privacy of its people. Personal data of employees will be collected and processed only for legitimate purposes, kept secure, and accessed only by those who need it.

5. Our commitments to communities and research participants

Our assessments and studies frequently involve direct engagement with households and communities, many of them in situations of vulnerability. In all such work the Company will:

- obtain free, prior and informed consent from every participant, in a language and format they understand, and respect their right to decline or to withdraw at any time without any consequence;
- assess, before fieldwork begins, the risks that participation may pose to participants, including physical, psychological, social and economic risks, and design studies to avoid or minimise them through the Company's internal ethics review process;
- not offer inducements that could compromise voluntary participation, and not make promises of benefits that have not been authorised;
- respect local customs, community governance structures and, in areas inhabited by Scheduled Tribes or other indigenous communities, the role of traditional and constitutional institutions such as the Gram Sabha;
- protect the confidentiality of participants, anonymise data at the earliest practicable stage, and never publish information that could identify a participant without their informed consent;
- collect sensitive personal information only where the study design requires it and the internal ethics review has approved it;
- represent participants and communities with dignity in reports, photographs and stories, and avoid images or language that are degrading, sensational or stereotyping; and
- follow the Company's Child Protection Policy whenever children are involved, directly or indirectly.

Where, in the course of fieldwork, our team becomes aware of a serious risk to the safety of a participant, the team will prioritise the safety of that person, refer them to appropriate support services where possible, and escalate the matter immediately to the engagement lead.

6. Human rights in the advice we give

Our influence extends beyond our own operations to the programmes that our clients fund on our advice. Accordingly, the Company will:

- consider human rights risks, including risks to women, children, persons with disabilities and marginalised communities, when it designs CSR programmes and recommends NGO partners;
- include, where relevant to the engagement, a review of a partner's safeguarding, POSH and grievance arrangements in the due diligence it carries out on NGOs and implementing agencies;
- report to the client, in a responsible manner that protects the people concerned, any significant human rights concern identified during an assessment, rather than omitting it from findings; and
- decline to undertake, or withdraw from, any engagement that would require the Company to act in a manner that is inconsistent with this Policy.

7. Partners, associates and suppliers

The Company expects its NGO partners, implementing agencies, field agencies, associates and suppliers to respect the standards in this Policy, as summarised in Annexure A of the Code of Conduct and Ethics. The Company will communicate these expectations before engagement, include them in contracts where appropriate, carry out proportionate due diligence on partners whose work involves direct contact with communities or children, and act on credible information that a partner is not meeting them. Where a partner does not take adequate corrective action, the Company may suspend or end the relationship.

8. Human rights due diligence

Consistent with the United Nations Guiding Principles, the Company will carry out human rights due diligence that is proportionate to its size and the nature of its work. This involves:

1. **Identifying and assessing** actual and potential human rights impacts in its workplace, fieldwork, advisory services and business relationships, with particular attention to people in vulnerable situations.
2. **Preventing and mitigating** those impacts by integrating the findings into policies, engagement planning, ethics review, field protocols, partner due diligence and training.
3. **Tracking** the effectiveness of these measures through grievances received, incident reports, employee feedback and periodic review.
4. **Communicating** how the Company addresses its human rights impacts, including in responses to client due diligence and, where appropriate, in public disclosures.

Human Resources, together with the Lead, Consulting Services, will review the Company's salient human rights risks at least once a year and report the outcome to the Managing Director.

9. Grievance mechanism and remedy

Anyone who believes that the Company, its personnel or a partner acting on its behalf has caused or contributed to a human rights harm may raise a grievance. Grievances may be raised in any language, orally or in writing, and anonymously if preferred.

Who	How to raise a grievance
Employees, interns and associates	Reporting manager; Human Resources (Sarutha Narayanan, sarutha@chrysalis-services.in); or the Managing Director, K. Sudhir Rao. Concerns involving the Managing Director may be raised as set out in Section 15 of the Code of Conduct and Ethics.
Community members, research participants and beneficiaries	Through any member of the Company's field team, who must record the grievance and pass it to the engagement lead within one working day; or by email to reachout@chrysalis-services.in. Field teams will share these contact details with participants at the time of seeking consent.
Partners, suppliers and others	By email to Human Resources or the Managing Director.
Sexual harassment	The Internal Committee, under the POSH Policy.
Concerns about a child	The Child Protection Officer, under the Child Protection Policy.

The Company will acknowledge a grievance within seven days, will aim to resolve it within thirty days, and will inform the person who raised it of the outcome. Where the Company finds that it has caused or contributed to harm, it will take steps to stop the harm, to provide or cooperate in appropriate remedy, and to prevent recurrence. No person will suffer retaliation for raising a grievance in good faith. These mechanisms do not limit anyone's right to approach the courts, the police or any other authority.

10. Roles and responsibilities

Role	Responsibility
Managing Director	Overall accountability for this Policy, approval of changes, and decisions on serious matters.
Human Resources	Ownership of the Policy; employment-related commitments; induction and training; grievance records; annual review.
Lead, Consulting Services, and engagement leads	Application of this Policy in fieldwork, ethics review, partner due diligence and client advice; first-line handling of community grievances.
All personnel	Compliance with this Policy, respectful conduct, and prompt reporting of concerns.

11. Training, communication and review

This Policy will be shared with every employee at induction and with every associate and field investigator before deployment, and will be published on the Company website. Field teams will receive practical training on informed consent, safeguarding and grievance handling. Human Resources will review this Policy annually and recommend changes to the Managing Director.