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St. RAPHAEL'S ACADEMY FOR EXCELLENCE

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HUMAN RIGHTS POLICY

St. Raphael's Academy for Excellence recognises the valuable role that business can play in the longer-term protection of human rights. We are committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business.

Our commitment entails respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing and minimising potential adverse impacts through due diligence and management of issues, and resolving grievances from affected stakeholders effectively.

We endeavour to achieve our commitment by:

- Maintaining a positive legal compliance with applicable constitutional and regulatory human rights requirements and conforming to the Sustainable Business Framework of **St. Raphael's Academy for Excellence**;
- Undertaking due diligence process, the focus of which is identifying, assessing and managing potential risks and impacts;
- Aligning our existing policies, processes and activities with our commitment to respect human rights, including those that apply to labour practices, engagement with indigenous people; land acquisition, supply chain, and security management;
- Promoting awareness of the human rights with employees at various levels of our operations through training and communication;
- Engaging with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities;
- Valuing diversity, equal opportunity and the need to consider the rights of vulnerable groups such as indigenous peoples, women, migrant workers and other minorities;
- Prohibiting all forms of harmful child labour, forced / trafficked labour, discrimination and harassment;
- Prohibiting any contribution to armed conflict or human rights abuses in conflict-affected and high-risk areas.
- Prohibiting interference in any way with the establishment, functioning or administration of workers' organisations, if any or collective bargaining;
- Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law;



- Providing access to remedy by resolving grievances in a timely and appropriate manner;
- Developing goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities;
- Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks;
- Continually improving human rights performance by sharing good practices and learning's, setting and reviewing targets, monitoring, reporting and disclosing performance.
- We are committed to operating our businesses conforming to the highest moral and ethical standards. We do not tolerate bribery or corruption in any form. This commitment underpins everything that we do.
- We are committed to good corporate citizenship. We treat social development activities which benefit the communities in which we operate as an integral part of our business plan.
- We seek to contribute to the economic development of the communities of the countries and regions we operate in, while respecting their culture, norms and heritage.
- We seek to avoid any project or activity that is detrimental to the wider interests of the communities in which we operate.
- We shall not compromise safety in the pursuit of commercial advantage.
- We shall strive to provide a safe, healthy and clean working environment for our employees and all those who work with us.
- When representing our company, we shall act with professionalism, honesty and integrity, and conform to the highest moral and ethical standards. In the countries we operate in, we shall exhibit culturally appropriate behaviour.
- Our conduct shall be fair and transparent and be perceived as fair and transparent by third parties. We shall respect the human rights and dignity of all our stakeholders.
- We shall strive to balance the interests of our stakeholders, treating each of them fairly and avoiding unfair discrimination of any kind.
- The statements that we make to our stakeholders shall be truthful and made in good faith.
- We shall not engage in any restrictive or unfair trade practices.
- We shall provide avenues for our stakeholders to raise concerns or queries in good faith, or report instances of actual or perceived violations of our Code.
- We shall strive to create an environment free from fear of retribution to deal with concerns that are raised or cases reported in good faith. No one shall be punished or made to suffer for raising concerns or making disclosures in good faith or in the public interest.



- We expect the leaders of our businesses to demonstrate their commitment to the ethical standards set out in this Code through their own behaviour and by establishing appropriate processes within their companies.
- We shall comply with the laws of the countries in which we operate and any other laws which apply to us.
- With regard to those provisions of the Code that are explicitly dealt with under an applicable law or employment terms, the law and those terms shall take precedence. In the event that the standards prescribed under any applicable law are lower than that of the Code, we shall conduct ourselves as per the provisions of the Code

Equal Opportunity Employer:

- We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.
- When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.
- We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code. These policies shall provide for clear terms of employment, training, development and performance management.

Dignity and Respect:

- Our leaders shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy.
- Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.
- We have clear and fair disciplinary procedures, which necessarily include an employee's right to be heard.
- We respect our employees' right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.



Human Rights:

- We do not employ children at our workplaces.
- We do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.

Bribery and corruption:

Our employees and those representing us, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business.

Prohibited Drugs and Substances:

Use of prohibited drugs and substances creates genuine safety and other risks at our workplaces. We do not tolerate prohibited drugs and substances from being possessed, consumed or distributed at our workplaces, or in the course of company duties.

We all at **St. Raphael's Academy for Excellence**, jointly and severally shall abide by this policy or develop an equivalent that shall be implemented throughout its operations.

This policy shall be reviewed periodically for its suitability and updated as & when necessary.

Date: 23 February 2022



Discipline and Grievance Policy

With a view to bring in discipline we have formulated code of conduct for each and every employee at St. Raphael's Academy for Excellence.

An employee code of conduct is a set of principles characterizes how an organization's workers should follow up on an everyday premise. It mirrors the association's day to day tasks, beliefs and organization culture.

Working with integration is our foundation. Integrity protects our team, our company, and our clients; improves our business performance; and differentiates us from our competitors. Our priorities lie with the sustained commitment to ethical practices. Though we promote freedom of expression and open communication, we still expect all employees to follow our Code of Conduct.

Purpose

Our Code of Conduct is the first step for an employee to get clarity on any questions relating to ethical conduct. It sets forth our core values, shared responsibilities, global commitments, and promises, and general guidance about the Company's expectations. However, our Code cannot possibly address every situation we face at work. Therefore, the Code is by no means a substitute for our good and unbiased judgement. We must remember that each of us is responsible for our own actions. The ethical choice is always the best choice.

Scope

Our Code of Conduct applies to all our employees regardless of employment agreement, rank, or location. The Code also applies to third parties, such as consultants, agents, suppliers, and others acting on the Company's behalf.



Cordial Atmosphere

To work effectively, all of us need a healthy and safe work environment. We provide a work environment free of coercion, discrimination, and harassment. Therefore, respect, inclusiveness and shared ethical values are at the heart of our core values. Irrespective of your department and rank, you should conform with our equal opportunity policy in all aspects of the work, from recruitment and performance evaluation to interpersonal relations. Remember, all forms of substance abuse as well as the use or distribution of drugs and alcohol while at work is strictly prohibited.

Compliance with Law

We comply with all laws, whether local, national or regional. All our employees, and those acting on our behalf must protect the Company's legality. They should comply with all environmental, safety and fair dealing laws. Violations of law can result in significant harm to the Company, including financial penalties, denial of government contracting privileges, imprisonment for criminal misconduct and damage to our business relationships and reputation. People associated with us are expected to be ethical and responsible when dealing with our company's finances, products, partnerships, and public image.

Protection of Company Property

All employees should treat our Company's property, whether material or intangible, with respect and care. Employees shouldn't misuse Company equipment or use it frivolously and should respect all kinds of incorporeal property. This includes trademarks, copyright and other assets including intellectual property. Employees should use them only to complete their job duties. Additionally, the use of our assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited.

Our Deliverables

Employees must compete fairly and ethically for all business opportunities. We serve our clients, regardless of role focusing on the best interests of our clients. Employees involved in the sale of our products and services must ensure that all statements, communications, and representations to clients are accurate, complete, and truthful. Similarly, you must not make or attempt to make any unauthorized commitments on the Company's or our client's behalf. Do not inappropriately implicate or involve the Company in your disputes with clients or others.



Financial Integrity and Accounting

Accurate and reliable financial and business records are of critical importance. You must not engage in any actions that could result in conveying false or inaccurate financial information to our Company or our clients. You must ensure that all submissions you make to the Company or the client on our behalf are complete and accurate.

Company Confidential Information

For any Company, its confidential information is a valuable asset and every director, employee, and agent of the Company must protect it. Confidential information includes all non-public information. It also includes personal information obtained from any source in the course of business. An important element of such protection is maintaining the confidentiality of confidential information and other proprietary information.

Responsible Social Media Usage

We expect you to comply with applicable laws and government guidelines governing social media. When using any form of social media, you must comply with this Code of Conduct. You must not disclose any confidential information about the Company or any of its employees, contractors or third-party vendors. We do not encourage you sharing and being part of any political or social propaganda on behalf of the Company unless specifically asked to do so.



Conflict of Interest

We must avoid situations involving an actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised. To avoid conflicts of interest and any appearance of favouritism, ensure that you do not work directly for, supervise or make employment decisions about a family member. Personal or romantic involvement with a competitor, supplier, or another employee of the Company might affect your ability to exercise good judgment on behalf of the Company. This could lead to a conflict of interest. Personal relationships and romantic liaisons between employees who are in a manager-employee reporting structure may lead to team management challenges and reduced morale. Such relationships must be disclosed to the manager immediately who may take appropriate corrective action.

Always Be Professional

All employees must show integrity and professionalism in the workplace:

- **Personal Appearance**

All employees must follow our dress code and personal appearance guidelines.

- **Corruption**

Employees accepting gifts from clients or partners is not appreciated. We prohibit briberies for the benefit of any external or internal party.

- **Job Duties And Authority**

All employees should fulfil their job duties with integrity and respect toward customers, stakeholders, and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

- **Absenteeism And Tardiness**

Employees should follow their schedules. We can make exceptions for occasions/emergencies that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work. Always keep your Manager informed of your delayed reporting to work or absenteeism from work.



- **Communication**

All employees must be open for communication with their colleagues, supervisors or team members.

- **Benefits**

We expect employees to not abuse their employment benefits. This refers to time off, insurance, facilities, subscriptions or other benefits our Company offers.

- **Policies**

All employees should read and follow the Company policies. For any queries, they should ask their managers or Human Resources (HR) department.

A Good Corporate Citizen

We support and respect human rights, foster environmental responsibility and encourage our people's involvement in the communities where we work and live.

Disciplinary Actions

Our Company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation.

Possible Consequences Include:

- **Demotion**
- **Reprimand**
- **Suspension or Termination for More Serious Offenses.**
- **Detraction of Benefits for a Definite or Indefinite Time.**

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviours.

23.2.2022



COMPLAINTS POLICY AND PROCEDURE

St.Raphael's Academy for Excellence is committed to providing a high level service to our customers and staff. If you do not receive satisfaction from us we need you to tell us about it. This will help us to improve our standards.

Complaints Procedure

1. If you are employed by us and have a complaint, please speak to your manager or supervisor.
2. If you are unable to speak to any of these people or are a customer then please speak to our office on +91 8589064123 or email at: straphaelsacademyktm@gmail.com
3. You can make a complaint in person, by phone, email or in writing. Whichever way, your complaint will be acknowledged and responded to within 3 working days.
4. The complaint will be recorded in St.Raphael's central register and each stage of the investigating procedure will be logged.
5. We will start to investigate your complaint and try to resolve it in the shortest possible time and to the satisfaction of all involved. You will be notified of the result of the investigation.
6. At this stage, if you are still not satisfied you can speak to us again. Vijay V Nair (Director) will review the decision and let you know of the outcome of this review, confirming our final position on your complaint and explaining our reasons.
7. If you are still not satisfied and are a worker/member of staff, you can contact

Date: 31 January 2022



WHISTLE BLOWING POLICY

1. Policy Values

1.1. **ST. RAPHAEL'S ACADEMY FOR EXCELLENCE** is committed to ensuring high ethics of conduct in all that it does despite the fact that in India, the Whistle Blowers Protection Act, 2014 is applicable to only a public servant and it does not extend its jurisdiction to the private sector. **ST. RAPHAEL'S ACADEMY FOR EXCELLENCE** is always on vigil about wrongdoing that can occur at any time. It is essential that employees know what to do if, in the course of their work, they come across something that they think is fundamentally wrong, illegal or endangers others within the department or the public. It is in this backdrop we have adopted and implemented The Whistle blowing Policy to ensure that employees feel safe to speak up and will guide employees through the process of raising a concern, which is sometimes referred to as 'blowing the whistle'.

1.2. **ST. RAPHAEL'S ACADEMY FOR EXCELLENCE** is committed to best practice and the highest standards of openness, justice and accountability in the delivery of its services. By implementing this policy we aim at:

- Employees are encouraged to speak up and raise any concerns they may have about wrongdoing as soon as they notice it;
- Employees raising a concern will be protected.
- Employees raising a concern will be listened to and treated with respect;
- All concerns will be handled responsibly, professionally and in a positive manner;
- Help and support will be provided to employees where concerns are raised under this policy;
- Managers will be supported in dealing appropriately with concerns which are raised with them.



2. Scope of Policy

2.1. The Whistle blowing Policy applies to all employees, all the stake holders who become a part of the supply chain in the course of doing business at **ST. RAPHAEL'S ACADEMY FOR EXCELLENCE**. This policy does not cover personal grievances including complaints about employment matters.

3. Policy Summary

3.1. Key areas covered by this policy and its procedures include:

- What type of concern can be raised;
- How to raise a concern;
- How it is handled;
- Confidentiality and anonymity;
- Provision of protection and support to employees.

Whistle blowing Procedure

1. Introduction

1.1. Whistle blowing is when an employee reports suspected past, present or imminent wrongdoing, or an attempt to conceal wrongdoing. Whistle blowing is important to safeguard the effective delivery of services and is a part of social responsible system for the betterment of society and the regulatory systems of the State in place.

1.2. This procedure outlines the process that employees should follow when reporting a perceived wrongdoing within the Organization, i.e. integrity, honesty, objectivity and impartiality.

1.3. The Management of **ST. RAPHAEL'S ACADEMY** wishes to encourage all its employees and others, if any, in the supply chain who have concerns about wrongdoing or malpractice



involving any aspect of the Department's work, to feel able to come forward and voice these without fear and in confidence. It is important that concerns are raised at the earliest time possible as this will allow the opportunity to address and resolve any concerns quickly.

2. Roles and Responsibilities

2.1. The responsibility of implementing and surveillance of this Policy primarily rests with the HR Head as the first point of contact and the Director of the Organisation, as the final resort to voice the concerns. The policy ensures the followings:

- Providing a safe environment where employees and others are confident that they can speak up and raise matters of concern;
- Ensuring that any matters raised are treated seriously and dealt with promptly in accordance with this policy and procedure;
- Maintaining confidentiality, as appropriate, of the employee(s) involved in the concern;
- Ensuring that anyone who raises a concern using this policy and procedure is supported and does not suffer any unfair or negative treatment as a result;
- Should deter and take appropriate action against bullying, isolating or victimisation of anyone using these procedures or against destruction of information about malpractice, not doing so may result in disciplinary action.
- Where appropriate, ensuring steps are taken to prevent re-occurrence of any concerns;

3. What type of concern can be raised?

3.1. A concern must be something which affects others such as your work colleagues or the general public.

- Criminal offences;



- Unlawful acts;(anything that breaches the prevailing laws of the state governing the people who work in private sector and social ethics & responsibilities being followed in general)
- Improper and/or unethical behaviour;
- Endangering the health or safety of any individual;
- Miscarriage of justice;
- Financial malpractice, impropriety or fraud;
- Mishandling or risks to data and/or information;
- Failure to comply with a legal obligation;
- Danger to the environment or people;
- Breaches of Departmental policies and procedures where an employee does not feel able to report their concerns through the Grievance Procedure, e.g. because they have witnessed wrongdoing or because they are fearful that doing so would result in a significant threat to themselves or any other person or they have reasonable grounds to believe that it may result in further harassment;
- Concerns raised should not be of an HR or personal nature, for example, complaints relating to a management decision, individual treatment or terms and conditions of employment.

4. How to raise a concern:

- Employees should speak up and raise a concern if they suspect wrongdoing.
- If an employee experiences something in the workplace which they consider to be in conflict with the regulatory systems prevailing in the state and society to be wrongdoing, it is important that the concern is raised straight away. The employee must, however, have a reasonable belief that disclosing the information is in the public interest.
- The concern should, in most instances, be raised with the HR Head designated to deal with the matter and with whom the employee feels most comfortable.
- If the employee is unsure/doubtful of being heard promptly by the HR Manager, in such cases he could approach the Director of the Company to voice his concerns.

5. Information needed to raise a concern:

5.1. When raising a concern under this procedure, an employee should provide the following information where possible:



- The nature of the concern and its key elements;
- When it happened?
- Who was involved?

5.2. In addition to details of the concern, an employee should try to provide the following information:

- The background and reason behind the concern;
- Whether they have already raised a concern with anyone and the response;
- Any other relevant dates;
- If applicable, any personal interests must be declared from the outset.

6. Procedure for Handling Concerns Raised

6.1 All investigations will be conducted sensitively, as quickly as possible, and under this procedure. The investigation should be concluded as early as possible within a maximum of three months after the matter has been raised.

6.2 The concern raised should be placed in writing which should be properly acknowledged by the nominated person.

6.3. Once a concern has been raised, the person to whom a complaint has been raised to should arrange a meeting to establish facts and determine how the concern should be taken forward. At the meeting, the employee may be accompanied by a colleague who is not involved in the area of work to which the concern relates if they wish.

6.4. Where appropriate, the designated officer may also advise that the matter should be referred to the Director. The Director shall take a final call on the subject.

6.5 Some concerns may be resolved by agreed action without the need for formal investigation. If urgent action is required, this may be taken before any investigation is conducted.

6.6. The Director may decide that no further action will be taken under this policy in the following circumstances:



- If, after investigation, there is no evidence that malpractice within the meaning of has occurred, is occurring or is likely to occur;
- If the matter concerned is already the subject of legal proceedings, or has already been referred to the public authority;

7. Confidentiality

7.1. Confidentiality of the case will be maintained strictly in case the whistle-blower wants to raise a concern in confidence, i.e. they may want to raise a concern on the basis that their name is not revealed beyond the disclosure route without their consent.

The Management will take steps in the investigation to ensure that confidentiality is maintained as far as possible and will endeavour to protect the identity of the person who raised the concern.

7.2. All parties will be under an obligation to use all reasonable endeavours to ensure that they keep the matter and all information relating to the disclosure strictly confidential except, as permitted under this procedure, as required by law or until such time as it comes into the public domain.

8. Protection

8.1. An employee will not be penalised for raising a concern.

8.2 We will protect any person who raises a concern in the belief that it is in the public interest to do so, from victimisation or reprisals such as being subject to discipline, dismissal or any other detriment as a result of raising the concern.

8.3 If an employee has been victimised for raising a concern, either during or after the concern has been raised, the Management will take appropriate action against those responsible, in line with the Disciplinary policy.



8.4 If an employee acts in bad faith or raises malicious or knowingly untrue concerns in order to harm colleagues or the Company, this will result in disciplinary action which may lead to dismissal subject to the HR Policies.

Date: 23 February 2022



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

In India, we are guided & governed by various legislations to combat the menace of Human Trafficking and slavery. Any person or organisation that violates these rules will be prosecuted and penalized.

Provisions of the Indian Penal Code of 1861 effectively abolished slavery in British India by making the enslavement of human beings a criminal offence.

Human trafficking are of various types viz., Trafficking of children, sex trafficking, forced marriage, labour trafficking (Bonded labour, forced labour child labour) and trafficking for organ trade.

Some of the legislations in India which act as watch dog for dealing with human trafficking are:

- Trafficking in Human Beings or Persons is prohibited under the Constitution of India under Article 23 (1)
- The Immoral Traffic (Prevention) Act, 1956 (ITPA) is the premier legislation for prevention of trafficking for commercial sexual exploitation.
- Criminal Law (amendment) Act 2013 has come into force wherein Section 370 of the Indian Penal Code has been substituted with Section 370 and 370A IPC which provide for comprehensive measures to counter the menace of human trafficking including trafficking of children for exploitation in any form including physical exploitation or any form of sexual exploitation, slavery, servitude, or the forced removal of organs.
- Protection of Children from Sexual offences (POCSO) Act, 2012 which has come into effect from 14th November, 2012 is a special law to protect children from sexual abuse and exploitation. It provides precise definitions for different forms of sexual abuse, including penetrative and non-penetrative sexual assault, sexual harassment.



- There are other specific legislations enacted relating to trafficking in women and children Prohibition of Child Marriage Act, 2006, Bonded Labour System (Abolition) Act, 1976, Child Labour (Prohibition and Regulation) Act, 1986, Transplantation of Human Organs Act, 1994, apart from specific Sections in the IPC, e.g. Sections 372 and 373 deal with selling and buying of girls for the purpose of prostitution.
- Anti-Trafficking Cell (ATC): Anti-Trafficking Nodal Cell was set up in the Ministry of Home Affairs (MHA) (CS Division in 2006 to act as a focal point for communicating various decisions and follow up on action taken by the State Governments to combat the crime of Human Trafficking

St. Raphael's Academy for Excellence have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any part of the supply chains.

1.2 **St. Raphael's Academy for Excellence** are committed to ensuring there is transparency in the business and in their approach to tackling modern slavery throughout their supply chains; expect the same high **St. Raphael's Academy for Excellence** from all of their contractors, suppliers and other business partners. As part of the contracting processes, **St. Raphael's Academy for Excellence** include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. **St. Raphael's Academy for Excellence** expect that their suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for **St. Raphael's Academy for Excellence** on their behalf in any capacity, including employees at all levels, contractors, external consultants, third-party representatives and business partners.



2. RESPONSIBILITY FOR THE POLICY

2.1 VENU VIJAYAN has overall responsibility for ensuring this policy complies with STRAPHAELS ACADEMY and ethical obligations, and that all those under their control comply with it.

2.2. VENU VIJAYAN has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of modern slavery.

3. COMPLIANCE WITH THE POLICY

3.1 All employees of **St.Raphael's Academy for Excellence** ensure that they read, understand and comply with the Modern Slavery Policy in the context of UK & India.

3.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for **St. Raphael's Academy for Excellence** or under their control. Any activity that might lead to, or suggest, a breach of this policy should be avoided.

3.5. Breaches or suspicion of breaches of this policy must be notified to a designated Manager in accordance with STRAPHAELS ACADEMY Whistle blowing Policy.

3.6. **St. St. Raphael's Academy for Excellence** aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. Any such treatment will not be tolerated and incidents should be reported to VENU VIJAYAN immediately.



4 COMMUNICATIONS AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for **St. Raphael's Academy for Excellence**

4.2 Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee, unless identified as a victim of modern slavery, who breaches this policy will face disciplinary action that may result in dismissal for misconduct or gross misconduct.

5.2 **St. Raphael's Academy for Excellence** will consider terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Date: 23 February 2022



DATA PROTECTION POLICY

Currently, India does not have comprehensive and dedicated data protection legislation. Some provisions of the Information Technology Act 2000 as amended from time to time (IT Act) and the Information Technology (Reasonable Security Practices and Procedures and sensitive personal data or information) Rules, 2011 (SDPI Rules) framed it under deal with Protection of Personal Information (PI) and sensitive personal data and information (SPDI).

The Personal Data Protection Bill, 2019 was introduced in Lok Sabha by the Minister of Electronics and Information Technology on December 11, 2019. The Bill seeks to provide for protection of personal data of individuals, and establishes a Data Protection Authority for the same. The Bill is still under consideration and it has not been enacted and it is expected that it will see the light of the day soon.

However, in the absence of a definite Law, we are committed to:-

- Preserve and protect the data of our clients, staff members and any business associates whom we are in exchange of Data of persons and business in the course of business for the mutual benefits and vice versa. We follow the business ethics of not using the data of our clients, staff members or any third party which we happen to receive in the process of business interaction.
- We are committed to follow that Data of any kind, be it business or Personal which can be highly confidential in nature will be dealt with high secrecy and security so that it will not leak out or fall into wrong hands. Financial data, biometric data, caste, religious or political beliefs, or any other category of data which we exchange with our clients will be dealt with due care.
- We implement internal checks and Do's and Don'ts amongst staff who handles important data of the client companies.
- Digital security system is installed in computer systems to ensure proper handling of data.
- Security Cameras are installed in all departments to monitor each and every staff who work with data.
- We collect undertaking from all staff and clients we deal with that any data which they come in contact should not be misused against the interest of our Company or Clients or any third party or any individual and secrecy of all data should be maintained strictly.



- While Transferring personal data outside India, the person whose data is transferred will be made aware of the same.
- Data concerning the security of the Nation, state etc. will not be exchanged under no circumstances.

Date: 23 February 2022



ANTI-BRIBERY AND CORRUPTION POLICY

ST.RAPHAEL'S ACADEMY FOR EXCELLENCE has a legal, moral and social responsibility to identify and deter anyone who wants to use our company to commit any sort of financial crime.

So, we take a zero tolerance approach toward bribery and corruption. Under our Anti-Bribery and Corruption policy, we don't allow the offering or receiving of any sort of bribe or corrupt payment. This applies to employees, consultants, distributors, sub-contractors and suppliers working for us.

Our employees must not:

- Offer, give, receive or accept bribes.
- Use facilitation payments (usually small cash payments to secure or speed up a routine or necessary action, or service level).
- Make political contributions to gain an advantage in business.
- Offer, give, receive or accept gifts or hospitality – whether this is to reward, bring about or encourage preferential treatment, inappropriate behaviour or dishonest conduct.

Our employees must:

- Tell us about any conflicts of interest.
- Tell us about any gifts or hospitality they receive and ask us to approve them.

We encourage employees worried about any sort of potential bribery or corruption to report this internally. This gives colleagues a secure and confidential way to tell us about bribery or anything they feel is suspicious. We don't tolerate victimization or harassment of whistle-blowers.

If one of our employees fails to comply with our Anti-Bribery and Corruption policy, we may take disciplinary action.

When we engage in business relationships with third parties, we make sure they have the necessary skills and experience to provide the services we pay them for. All our business partners have to be reputable and reliable with a good track record, and they must charge a fair market price for their services.

We expect all our potential and existing business partners to have the same ethical standards as **STRAPHAEL'S ACADEMY**. They must also comply with the applicable laws of the client country and be able to meet our due diligence requirements quickly and efficiently.



Anti-bribery and corruption is how we describe the systems and controls we have in place to prevent **STRAPHAEL'S ACADEMY** or one of our employees breaching relevant laws.

There are four key elements.

1. Bribing another person.
2. Being bribed.
3. Bribing a foreign official.
4. Failing to prevent bribery.

At **STRAPHAEL'S ACADEMY FOR EXCELLENCE** we are committed to maintaining an anti-bribery framework.

Date: 31 January 2022.



Anti-discrimination and Equal Opportunity Policy

We at **St Raphael's Academy for Excellence** are committed to abide by and implement Anti-discrimination and Equal Opportunity Policy of the Indian regulatory authorities in our firm and the stakeholders and clients and staff we interacts and deal with in the course of our business.

Indian constitution encapsulates social safeguard measures for all citizens of India in Article 15 and Article 16. Article 15 mandates prohibition of discrimination on grounds of religion, race, caste, sex or place of birth.

Article 16 mandates equal opportunity in matters of public employment. Article 16(2) further states that no citizen shall on grounds only of religion, race, caste, sex, descent, place of birth, residence or any of them, be ineligible for, or discriminated against in respect of, any employment or office under the State.

We are committed to promoting equal employment opportunities and a workplace that is free of all forms of discrimination. Equal opportunity means that all staff experience fairness, impartiality and equal access to all who deals with us. We are committed to equal opportunity promotes an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its staff. The Anti-Discrimination and Equal Opportunities Policy is consistent with our pursuit of excellence. This policy is underpinned by a set of values and key guiding principles in the building of a community of all employees.

This Non-Discrimination and Equal Opportunities Policy ("Policy") states the internal policy of our organisation with regard to non-discrimination at the workplace and equal opportunities during recruitment.

This Policy is meant to provide a safe, diverse and comfortable workplace at our organisation. This Policy is without prejudice to any anti-discrimination provisions of applicable law including, but not restricted to, the provisions of:

- Article 17 of the Constitution of India;
- the Protection of Civil Rights Act, 1955,
- the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989;
- the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013;
- Sections 354 and 509 of the Indian Penal Code, 1860; and,



- The Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995.

Policy Objectives:

The objectives of this Equal Opportunity (EEO) and Anti-Discrimination Policy are to ensure that all:

1. Our employees or potential employees do not suffer unfair discrimination in the workplace.
2. Individuals working with us and are recruited by us work in an environment where all decisions are free of discrimination, where they have equal opportunity based on relevant abilities and merit.
3. Employees are encouraged to take positive action towards promoting equal opportunity throughout the organization.
4. Personnel actions, such as compensation, benefits, transfers, layoffs, company-sponsored training programs, and social and recreational programs, will be administered on a non-discriminatory basis.
5. Application of labour laws to be uniformly applied in the organization.

Anti-discrimination:

1. We will not adversely discriminate, and prohibits other adverse discrimination at the workplace, on the basis of religion, race, caste, sex, place of birth, descent, sexual orientation, gender identity, disability, age or any of them (“Discrimination Characteristics”). We will not condone any adverse discrimination against any person on its premises, whether that person is its students or employee or otherwise.
2. Any person who believes himself or herself to have been subjected to adverse discrimination on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the Management at the earliest practical opportunity.
3. Any adverse discrimination or other action or behaviour that constitutes a violation of law will be reported to the police.



Equal Opportunities:

1. We provides equal opportunities to its employment, consultancy or otherwise without regard for the Discrimination Characteristics. We act with regard to our employees relating to compensation, benefits, transfers, leave, layoffs, training, education, and assistance, will be made without regard for the Discrimination Characteristics.
2. Notwithstanding anything contained in the previous paragraph, if we reasonably believes that its employment, workplace or premises do not adequately represent the balance of diversity of persons who share one or more of the Discrimination Characteristics, it may, with the aim only of redressing that imbalance, take positive discriminatory action in respect of persons who share that aspect, or those aspects, of the Discrimination Characteristics that are sought to be adequately represented.
3. Any person who believes himself or herself to have been subjected to adverse discrimination, or impermissible positive discrimination, on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the Internal Complaint Committee at the earliest practical opportunity.

Nature of workplace Discrimination:

Discrimination occurs when someone is treated unfavourably because of a certain attribute. Discrimination may involve some or all of the following:

1. Conduct that can be considered harassing, coercive or disruptive, including sexual harassment
2. Making offensive 'jokes' about another worker's clan, ethnic background, colour, sex or disability
3. Expressing negative stereotypes about particular groups e.g. "married women shouldn't be working."
4. Judging someone on their political or religious beliefs rather than their work performance.
5. Using selection processes based on irrelevant attributes such as ethnic or clan group, age, sex or disability rather than on knowledge, skills and merit. Parameters of Discrimination – Strictly Prohibited



We and its employees shall strive to create a workplace that is free from discrimination in their employment practices against any potential or existing employees, and shall not discriminate on a person's:

- Age or other circumstances
- Colour
- Cultural or social beliefs such as religious
- Educational Background
- Race, ethnicity or nationality
- Spiritual, traditional or customary beliefs
- Political opinion
- Physical features
- Gender identity and expression
- Marital status
- Pregnancy or judging the impacts of potential pregnancy on decisions
- Breastfeeding
- Sexual orientation
- Health or physical disability or impairment
- Medical record / HIV status

We assure that every steps are taken within the frame work of applicable laws in India via, Indian constitutional laws, Labour Laws, Human Rights Law, Civil & Criminal Laws, Shop and Establishment Act to check any kind of discrimination, infringement of human rights and any kind of malpractices so that all are treated with justice, human rights, without any discrimination of religion, race, caste, creed, sex, gender etc.

Date: 23 February 2022