

# Athena Infonomics

## Communication on Progress (CoP)

Period covered by CoP: October 20, 2021 to October 20, 2022

### I. STATEMENT OF CONTINUED SUPPORT

To our valued stakeholders,

I am pleased to confirm that Athena Infonomics India Private Limited reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

With this Communication on Progress (CoP), we are fulfilling our commitment to reporting on the vital policies that we have enacted and maintained since submitting our last CoP. This document describes our actions aimed at continually improving the integration of the Global Compact and its principles into our business strategy, culture, and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Though Athena Infonomics India Private Limited's work touches upon many of the Sustainable Development Goals (SDGs), the actions described in this document reflect priorities aligned most closely with: SDG 3 (good health and well-being); SDG 5 (gender equality); SDG 8 (decent work and economic growth); SDG 13 (climate action); and SDG 16 (peace, justice, and strong institutions).

In this document, Athena Infonomics India Private Limited provides the following:

- A statement of continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles.
- A description of practical actions we have taken and are maintaining in order to implement the UN Global Compact principles in the areas of human rights, labour, environment, and anti-corruption.
- A measurement of outcomes that demonstrates movement on our stated actions.

Sincerely yours,



Mr. Vijay Bhalaki  
Co-Founder and Partner  
Athena Infonomics

## II. DESCRIPTION OF ACTIONS

### Human Rights

- Athena Infonomics adheres to a **Human Resources and Occupational Health and Safety Policy** that ensures:
  - A prioritization of ethical behavior and safety, with a commitment to the success and professional development of our employees.
  - A commitment to human rights principles governed by the International Labour Organization.
  - The prevention of occupational risks, insuring the safety and health of employees and partners.
  - An awareness of our activities in industries where occupational hazards are widely present.
- We mandate review (and acknowledgement) of documentation related to India's **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act of 2013** (known as the POSH Act) with the specific purpose of preventing sexual harassment at the workplace.
- We have put in place a **Policy on Child Protection**, in which Athena's staff members and those working with Athena share a common responsibility and commitment to the awareness, prevention, and reporting of and responding to child abuse in the course of their work.
- We are working towards compliance with the **General Data Protection Regulation (GDPR)**, the primary aim of which is to enhance individuals' control and rights over their personal data and to simplify the regulatory environment for international business.

### Labour

- Athena Infonomics adheres to a strict **Anti-Slavery and Human Trafficking Policy** that reflects a zero-tolerance approach to modern slavery. We are committed to acting ethically, transparently, and with integrity in all of our business dealings and relationships. We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business.
- We maintain **compliance with laws and regulations** on wages and working hours, respecting the rights of all workers in applicable standards and agreements, and ensuring a healthy work environment.
- We have put in place a **Whistleblower Policy** that serves as a mechanism for employees to raise concerns on any violations of legal or regulatory requirements, incorrect claims on or misrepresentation of any financial statements and reports, etc.
- We enact **Equal Employment Opportunity policies** to ensure that all employment-related decisions and terms and conditions of employment are based solely on job qualifications, competence, and performance, irrespective of a person's race, creed, color, religion, gender, national origin, age, non-job-related disability, or any other category protected by law.

## Environment

- Athena Infonomics adheres to an **Environmental Safeguards Policy** that sets out Athena's approach to anticipating, and then avoiding, preventing, minimizing, mitigating, managing, offsetting, and/or compensating any adverse impacts that Athena-managed projects and programs may have on people or the environment throughout the projects or program cycles—thereby enhancing the environmental and social outcomes of such projects and programs.
- Furthermore, our **Human Resources and Occupational Health and Safety Policy** ensures the prevention of occupational risks, insuring the safety and health of employees and partners.

## Anti-Corruption

- Athena Infonomics maintains a zero-tolerance **Anti-Bribery and Corruption Policy** that sets out the organisation's policies to prevent acts of bribery and corruption, in compliance with global legislation governing bribery and corruption.
- Furthermore, our **Code of Conduct** states that the organisation and all employees are prohibited from providing anything of value, directly or indirectly, to government officials and business partners in order to secure an undue advantage.

### III. MEASUREMENT OF OUTCOMES

- **Human Rights**
  - **6 mandatory awareness lectures** that educate staff on India's Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act of 2013 (known as the POSH Act)
  - **3 principles** that guide our Policy on Child Protection
- **Labour**
  - In keeping with our Equal Employment Opportunity policies:
    - **50 percent** of full-time staff members **are female**
    - **40 percent** of senior positions or functional/practice heads roles are **filled by women**
  - **6 compliance guidelines** that inform our Anti-Slavery and Human Trafficking Policy
  - **6 principles** that direct our Whistleblower Policy
- **Environment**
  - **12 objectives** that govern our Policy on Environmental Safeguards
  - **15 principles** that guide our Human Resources and Occupational Health and Safety Policy
- **Anti-Corruption**
  - **18 prompts** that can help team members identify potential instances of bribery and corruption, found within our Anti-Bribery and Corruption Policy