

## **Haldia Petrochemicals Limited**

### **HUMAN RIGHTS POLICY**

#### **Background & Purpose**

Haldia Petrochemicals Limited (also known as “HPL”, “the Company” & “we”), pledges to uphold the human rights of its employees and workers, the communities in which it operates, and the stakeholders impacted by its business activities (including contractors and value chain partners), in adherence to national and global standards. This commitment is in alignment with the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights, and the UN Convention on the Rights of the Child, alongside relevant national and regional regulations. The aim of this policy is to establish the labour and human rights benchmarks that all members of HPL are guaranteed.

#### **Scope**

Key stakeholders considered while addressing the human rights issues include Board members, Employees and Workers (permanent and temporary), Suppliers / Vendors and Dealers and Local communities.

#### **Policy Commitments**

- **Dignity of all stakeholders**

- **Engagement with Local Communities:** The Company should engage in regular and transparent consultations with local communities, ensuring sensitivity and openness throughout the process. Efforts should be made to obtain the free and informed consent of indigenous peoples before proceeding with any developmental activities.
- **Treatment of Employees and Workers:** Employees and workers must adhere to the HPL Code of Conduct and be treated with dignity, aligning with HPL's commitment to fostering a work environment that is free from all types of harassment, whether it be physical, verbal, or psychological.
- **Standards for suppliers/vendors and dealers:** Suppliers / vendors and dealers are expected to uphold a work environment that is free from any form of harassment,

be it physical, verbal, or psychological. HPL shall also enforce these standards within its contractual agreements.

- **Ethos of Human Rights respect and support:** HPL recognizes the human rights of all its stakeholders, placing a strong emphasis on fostering positive community relations:
  - **Engaging with local/indigenous communities and upholding their rights:** The company is committed to comprehensively understanding the viewpoints of local and indigenous communities through meaningful consultation processes, thereby demonstrating respect for their rights. HPL acknowledges that operational activities may inadvertently impact these communities, particularly minority or indigenous groups. Therefore, proactive measures are necessary to address any unintended consequences that may arise.
  - **Work Conditions:** Priority is given to ensuring that employees and workers receive adequate training to perform their duties in a safe, healthy, and environmentally responsible manner. Compliance with the Factory Act of 1948 serves as the foundation for recording and reporting occupational accidents and diseases within the Company.
  - **Wages:** Ensure that wages align with the Minimum Wage Act, 1948 and other relevant labour laws of the country. We prioritize on providing fair remuneration for employees and workers, ensuring that wages undergo regular reviews through a transparent and equitable process.
- **Preventing complicity in human rights violations:** The company shall ensure that it does not engage in or condone any human rights abuses, including but not limited to:
  - **Child labour:** The Company is committed to eradicate child labour in all aspects of its operation. Moreover, the Company shall ensure obtaining undertaking from its suppliers/contractors to refrain from employing child labour in their operations and throughout their value chain. If necessary, the Company will conduct monitoring of their employment practices using surveys, site visits, and audits.
  - **Forced labour:** The company shall refrain itself from employing any form of bonded, forced, or compulsory labour. Moreover, the Company shall ensure obtaining undertaking on non-involvement in forced labour from its suppliers / contractors.
- **Diversity & Inclusion:** The Company aims to create an inclusive workplace and leverage the power of diversity for sustainable competitive advantage, where employees from

different backgrounds can have the opportunity to participate, develop and contribute freely and equitably. The Company strives to maintain workplaces that are free from discrimination or harassment based on race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The organizational framework governing recruitment, placement, development, training, compensation, and advancement is based purely on the assessment of qualifications, performance, skills, and experiences.

- **Freedom of association and right to collective bargaining:** The Company upholds the fundamental rights of its employees and workers to freely associate and engage in collective bargaining without fear of retaliation or discrimination. The Company recognizes that these rights are essential for fostering a fair and equitable work environment. Employees and workers are encouraged to form or join trade unions or other associations of their choosing, and the Company is committed to engaging in constructive dialogue and negotiations with these representative bodies.
- **Health, Workplace Safety and Environment:** The Company is committed to demonstrating a high standard of environmental protection and provision of a safe and healthy workplace. The Company has in place various practices, policies and financial & non-financial measures to ensure a safe and healthy workforce.
- **Due Diligence:** Undertaking an iterative, due diligence process, the focus of which is identifying, assessing and managing potential risks and impacts.
- **Sensitization:** Promoting awareness of the human rights with employees at various levels of our operations through training and communication.
- **Compliance:** The Company is committed to adhering to all relevant national and regional regulations concerning human rights. Furthermore, it will ensure alignment with the principles set forth by the International Labour Organization (ILO) and the United Nations Global Compact (UNGC), reflecting its dedication to upholding universal standards of human rights across operations.

### **Actions & Procedures**

The Company proactively identifies and addresses human rights related risks and opportunities to continuously improve the workplace policies, practices, and initiatives.

Violations of this policy or any related human rights issues can be reported to the HR department at HPL. Non-compliance or failure to cooperate will lead to disciplinary measures, which may include termination of employment and legal referral if necessary. The Company

also maintains the prerogative to end relationships with suppliers if there is credible evidence of human rights violations on their part.

### **Responsibility & Overview**

The HSE Committee will have the primary responsibility for overseeing and establishing the policy, while the ESG strategy and execution team will be tasked with its comprehensive implementation.

### **Implementation and Monitoring**

- The Policy is communicated to all employees and workers across all departments, functions, teams, and verticals, and is also displayed on the Company's internal communication portals.
- Adherence and compliance with the Policy shall be monitored and evaluated by the Functional Heads of the Departments / Unit Heads of the Company at regular intervals.
- All grievances/complaints with respect to breach of the Policy shall be reported to Head-Human Resources, and subsequently to the Whole-time Director & CEO, for effective redressal of the grievances.

### **Review and Amendment**

This Policy shall be reviewed and evaluated as and when required to establish and confirm that it meets the objectives of the relevant legislation and remains effective. The Whole-time Director & CEO has the complete right to make amendments to this Policy in whole or in part, at any point of time without assigning any reason, whatsoever.

Place: Kolkata

By order of the Board of Directors

Date: 09.07.2024

Sd/-

Whole-time Director & CEO