

POLICY ON HUMAN RIGHTS



POLICY STATEMENT:

It is the Company's public expression of its commitment to meet its responsibility to respect internationally recognized human rights standards. At a minimum, this means the rights set out in the UN Guiding Principles on Business and Human Rights, the International Bill of Rights and the ILO's Declaration on the Fundamental Principles and Rights at Work.

APPLICABILITY:

Elgi Equipments Limited and all its subsidiaries and affiliates, including joint ventures.

OBJECTIVES:

Company's goal is towards meeting its responsibility to respect human rights. The Company wishes to send a clear signal to internal and external stakeholders that it is striving to embed human rights into its business and in the process build increased trust with and address their concerns. To demonstrate adherence to international good business practices.

POLICY

A) THE COMPANY COMMITS TO RESPECT INTERNATIONAL HUMAN RIGHTS

STANDARDS:

The Company respects international human rights principles aimed at promoting and protecting human rights, including the United Nations Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and we actively participate in the United Nations Global Compact.

The Company seeks to establish relationships with entities that share the same principles and values as the Company. The Company will also promote human rights awareness and respect along our value chain, including the adoption of legal contractual clauses. In the event of disrespect to human rights, duly proven by government authorities and mechanisms provided by legislation, we notify the supplier/ service provider or the customer so they may adopt corrective measures and, in cases in which such measures are not taken, we would engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.

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The Company values diversity, equality of opportunity and fair treatment. We respect every individual's human rights and do not discriminate on the basis of race, color, gender*, sexual orientation, gender identity, religion, political opinion, nationality, social origin and status, indigenous status, disability, HIV/AIDS infection, age or any other personal characteristic or status. We do not tolerate disrespectful or inappropriate behavior, harassment, intimidation or unfair treatment, or retaliation of any kind by our employees or those of our suppliers and business partners. This includes the use of corporal punishment, threats of violence or other forms of coercion, public punishment or any other forms of physical, verbal or psychological abuse. We offer various safeguards to our employees, suppliers, business partners, customers and consumers and maintain them with respect for their privacy and dignity.

- *gender: includes transgender, i.e, a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations**, gender queer and person having such socio-cultural identities askinner, hijra, aravani and jogta.
- **intersex variations: means a person who at birth shows variation in his or her primary sexual characteristics, external genitalia, chromosomes or hormones from normative standard of male or female body.

B) COMMITMENT TO SUPPORT HUMAN RIGHTS

We operate across vast geographic locations, including areas where social, economic and political factors may put human rights and acceptable working conditions at risk. Our actions to support and respect human rights in these areas help us to live up to our commitment.

C) HUMAN RIGHTS IN THE WORK PLACE

In our workplaces, the Company prohibits the employment of individuals under the age of 18 years. The Company forbids the use of all forms of force in the workplace. Further, the Company prohibits child, adolescent, bonded or compulsory labor, including any form of human trafficking. We compensate employees in relation to the industry and local labor markets, and comply with relevant wage, work hours, overtime and benefits laws or prevailing industry standards. Employment relationship with an employee will be based on equality, fair wages/compensation. The Company will follow the working hours prescribed by law. There will be no forced/bonded/compulsory labor under any circumstances. We respect our employees' right to freedom of association and collective bargaining and ensure that they can choose do so without fear of reprisal, intimidation or harassment. We are committed to establishing constructive dialogue with employee labor representatives and bargaining with them in good faith. The Company commits to providing equal opportunity and fair treatment to its employees at workplace and,

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a. That in respect of Persons with Disabilities

- ⊙ Full adherence to the provisions of law with respect to the Rights of Persons with Disabilities.
- ⊙ Recruit, develop, and promote our employees based solely on the performance, merit, competence, and potential.
- ⊙ A conducive environment is provided to employees with disabilities to perform their roles and excel in the same.
- ⊙ Fair, transparent and clear employee policies which promote diversity and equality, in accordance with the applicable law and other provisions of our Code of Conduct.
- ⊙ Give equal opportunity to the person with disability at all stages of employment in the company, including recruitments, selections, Promotions, infrastructure adjustments, employment benefits and other related issues.

b. That in respect of transgenders

- ⊙ There is no unfair treatment meted out in, or in relation to, their employment with the company;
- ⊙ There is no denial of, or termination from, employment;
- ⊙ There is no denial or discontinuation of, or unfair treatment in, healthcare services;
- ⊙ There is no denial or discontinuation of, or unfair treatment with regard to, access to, or provision or enjoyment of any goods, accommodation, service, facility, benefit, privilege or opportunity dedicated to the use of other employees of the company or customarily available to such other employees. In this connection, company shall provide infrastructural facilities (such as unisex toilets) and implement measures for safety and security (transportation and guards) and amenities (such as hygiene products) to the transgender;
- ⊙ There is no denial or discontinuation of, or unfair treatment with regard to the right of movement within company's premises;
- ⊙ There is no denial or discontinuation of, or unfair treatment in, the opportunity to be a representative of employees;

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- ⦿ There is no denial of access to, removal from, or unfair treatment in the company;
- ⦿ That all rules and regulations of the company are uniformly applied to all employees including transgender, regarding service conditions of employees;
- ⦿ The company assures to maintain confidentiality of the gender identity of transgender;

c. That in respect of HIV/AIDS infected persons

- ⦿ Full adherence to all policies, guidelines and directives of the Government of respective states/countries on HIV/AIDS.
- ⦿ Endeavour to create and promote a favourable work environment for free information exchange and awareness on prevention, care and support including promotion of counseling of HIV/AIDS among the employees and their families.
- ⦿ Sensitize the employees to encourage their participation in planning and implementing the HIV/AIDS education, care and support initiatives.
- ⦿ Endeavour to discourage and eradicate discrimination or stigmatization of employees on the basis of their real or perceived HIV status.
- ⦿ There is no discrimination against any employee infected by HIV/AIDS with regard to promotions, training or any other privileges/benefits applicable to the employees of the Company.
- ⦿ The Company does not insist on compulsory HIV testing and screening of employees during the pre-employment medical test or anytime during the course of their employment.
- ⦿ There is no obligation on the part of the employees to inform the Company about their clinical status, except on a purely voluntary basis. Confidentiality will be strictly maintained regarding all medical information, especially HIV/AIDS status of the employees, by the treating doctors and other employees handling medical information.
- ⦿ HIV infection would not be a cause for termination of employment.

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- Encourage employees to create a climate at the workplace through ongoing education and awareness programmes so as to make the affected person(s) comfortable.

HUMAN RIGHTS IN THE COMMUNITY

The Company is committed to engaging with stakeholders in the communities where we operate, inviting their input and taking their views into account. We are also committed to creating economic opportunity, fostering goodwill and improving human rights by implementing corporate social responsibility and employee engagement initiatives. The Company recognizes the importance of land rights and are committed to the principle of free, prior and informed consent, and support its implementation by relevant national authorities within their legal frameworks. Further, the Company respects the culture and heritage of the local communities where we operate, including socially and economically vulnerable groups, and work towards developing constructive relationships with them.

HEALTH, SAFETY AND THE ENVIRONMENT

The Company is dedicated to maintaining a safe, hygienic and healthy workplace that complies with applicable health and safety laws, and minimizes the possibility of accidents, injuries and exposure to health risks. The Company engages with employees to continually improve health and safety practices, including identifying and remediating health and safety hazards and issues. Understanding that both good health and a healthy environment is a prerequisite for sustainable economic growth and the wellbeing of society, we seek to minimize the direct and indirect negative impacts of the Company's operations, products and services, and continually improve our health, safety) and environmental performance. In addition, we support our customers with product information so that they can make informed decisions and use those products as intended— safely and responsibly.

RESPONSIBILITY FOR IMPLEMENTING THE POLICY

Responsibility for implementing this policy will be through cross-functional teams of Human Resources (in so far as inculcating the principles within employees) and Operations (for inculcating the principles to Company's suppliers/service providers). Overall guidance shall be provided by the legal team and any external consultant that the Company may engage.

COMMUNICATION OF THE POLICY INTERNALLY AND EXTERNALLY

The policy should be publicly available. It needs to be disseminated to all employees to raise awareness and establish systems of accountability, and be coupled with relevant training. The Policy should also be communicated to business partners and other relevant external parties with whom the company has contractual relationships, others directly linked to its operations (e.g. suppliers, security providers) and investors. As the emphasis is on transparency, this Policy will also be posted on the Company's web site.

COMPLAINTS

Stakeholders may contact the Chief Human Resources Officer, Director-Operations or the Internal Auditor under the Whistleblower Policy if they have any concerns, grievances or complaints. The Company is committed to investigating, addressing and responding to any concerns raised, taking appropriate corrective action when required, tracking the progress and communicating with stakeholders about human rights issues within timelines, if any prescribed under the whistle blower policy or under the relevant law.