



INDO COUNT INDUSTRIES LIMITED

HUMAN RIGHTS POLICY

Version No.: 1.0

Version Date: 25-12-2023

Approved by: Board of Directors

A. OBJECTIVE

At Indo Count Industries Ltd. ('ICIL' or 'the Company'), we are committed towards conducting our businesses in a fair and equitable manner, meeting our social responsibilities as a principal employer and respecting the human rights of all our stakeholders in accordance with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILO Declaration), and the United Nations' Guiding Principles on Business and Human Rights (UNGPs). The Human Rights Policy ('Policy') outlines our initiatives and activities to ensure adherence and commitment to meeting our social responsibilities.

B. SCOPE AND APPLICABILITY

This policy is applicable to all ICIL employees, employees of its subsidiaries, suppliers and business partners across all its operations, in all the geographies in which it operates.

The policy covers our human rights commitment in the below aspects:

1. Human trafficking, child labour, forced and compulsory labour
2. Freedom of association and collective bargaining
3. Discrimination and harassment
4. Equal opportunity
5. Safe and healthy working conditions
6. Equal / Fair remuneration

C. POLICY STATEMENT AND GUIDELINES

1. The Company has zero tolerance towards and prohibits engagement of child labour, forced or compulsory labour and any form of human trafficking in any of its operations and establishments or through its business partners / vendors, contractors and suppliers.
2. The Company recognizes and respects employees' rights to exercise freedom of association in matters related to their employment including their right to collective bargaining, in accordance with applicable rules/regulations/laws/guidelines, etc.
3. The Company has zero tolerance policy towards discrimination and prohibits discrimination in matters relating to employment, compensation, training, opportunities and employee benefits on the basis of caste, creed, religion, language, ethnicity, disability, age, gender, sexual orientation, race, colour, marital status or union organization, or any other status protected by appropriate laws.

4. The Company follows an equal remuneration for equal work policy and adheres to all applicable laws and regulations in the matter of deciding remuneration/wages/salaries, hours of work and welfare measures.
5. The Company has 'zero tolerance' towards and prohibits sexual harassment, and / or non-sexual harassment, and/or any conduct that may foster an offensive or hostile work environment. The Company treats all employees with respect and dignity. All employees are appraised solely on their performance irrespective of their race, religion, caste, gender, sexual orientation, age, or disability.
6. The Company ensures compliance with applicable laws related to wages, work hours, leaves, leave with wages, and benefits, to both regular employees of the Company as well as workers deployed by contractors.
7. The Company is committed to provide and maintain a safe, healthy workplace by addressing the risks of accidents, injuries, and hazards on a continuous basis.
8. The Company is committed to compensate in case of incapacity or loss of life, to the victim or dependent as the case may be, directly or through an agency or contractor, as per applicable policies/rules/regulations.
9. The Company is committed to maintain a workplace that is protected and secured from violence, harassment or any other disruptive conditions.
10. The Company is committed to protect the right to privacy of its employees and does not disclose personal information/data to third parties without employees' consent.
11. The Company provides a robust grievance redressal mechanism for all its stakeholders to address issues of human rights violations, if any.
12. The Company provides opportunities for various learning and development programs towards the overall development of its workforce, in addition to mandatory training for all employees with regard to code of conduct, discrimination and harassment etc.

D. RESPONSIBILITY AND REVIEW

The HR Head and Plant Head of the Company shall be responsible for the effective implementation of this policy.

This Policy will be overseen by the NRC and shall be reviewed periodically and amended as may be necessary.