

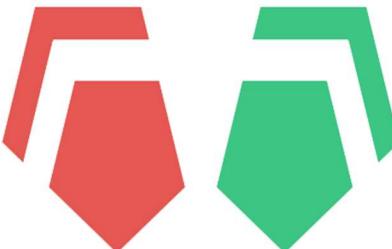


HPL ADDITIVES LIMITED

FAIR LABOUR PRACTICES POLICY

Harassment Prevention

Prevents any form of harassment, fostering a respectful and inclusive workplace.



Equitable Wages

Ensures fair compensation for all employees, promoting financial stability and motivation.

Non-Discrimination

Prohibits any form of bias, ensuring equal opportunities for all.



Safe Working Conditions

Guarantees a secure and healthy environment, minimizing workplace hazards.

Right to Organize

Supports employees' freedom to form unions and advocate for their rights.



FAIR LABOUR PRACTICES POLICY

HPL ADDITIVES LIMITED

Document No.: HPL/HR/SOCIAL/01

Issue Date: 01/04/2025

Issue No.: 01

Revision No.: 01

1) Introduction

HPL Additives Limited (“HPL”) is committed to upholding the highest standards of **labor and human rights** across our operations and value chain. As a manufacturer of polymer additives and specialty chemicals, we recognize that **safety, dignity, fair treatment, and equal opportunity** are fundamental to sustainable growth and responsible chemistry. This Policy sets out our principles, measurable targets, and governance to ensure every individual associated with HPL is treated with **respect, equity, and care**.

2) Scope

This Policy applies to **all HPL employees, contract/temporary workers, apprentices and interns, contractors working on our premises, and suppliers and service partners** supporting HPL’s business. It covers **all HPL locations**, including our facilities in **Faridabad (Haryana)** and **Derabassi (Punjab)**.

3) Our Labor & Human-Rights Commitments

HPL aligns with applicable **Indian laws** and internationally recognized standards (e.g., **ILO Core Conventions, UN Guiding Principles on Business & Human Rights**). We commit to:

- 3.1. Legal compliance:** Meet or exceed applicable labor, employment, and social-security laws and standards.
- 3.2. Health & safety as a human right:** Provide a safe and healthy workplace, integrate Process Safety for high-hazard chemistries, and continually reduce risk.
- 3.3. Prohibition of child labor: No child labor. Where young workers (as permitted by law) are engaged in non-hazardous roles, we implement enhanced protections (medical fitness, restricted hours, no night/OT).**
- 3.4. No forced labor or trafficking: Employment is freely chosen. We prohibit retention of IDs, charging recruitment fees, deposits, or restricting freedom of movement.**
- 3.5. Fair wages & benefits:** Pay at least legal minimums (and aspire to living-wage parity over time), ensure timely payment, equal pay for equal work, and lawful deductions only.
- 3.6. Working hours & rest:** Comply with legal limits on hours and overtime; overtime is **voluntary**, recorded, and paid at the lawful premium; rest days are respected.
- 3.7. Freedom of association & collective bargaining:** Respect employees’ rights to organize and bargain collectively; where law restricts, enable **equivalent alternative mechanisms** for worker voice.
- 3.8. Non-discrimination, diversity, equity & inclusion:** Zero tolerance for discrimination or harassment on any protected ground (e.g., gender, caste, religion, ethnicity, age, disability, sexual orientation).
- 3.9. Ethical recruitment & migrant workers' rights: No recruitment fees** to workers; contracts in a language understood; equal access to benefits and grievance channels.



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3.10. Privacy & data protection: Safeguard personal data and use it fairly and lawfully.

3.11. Supply-chain standards: Extend these expectations through a **Supplier Code of Conduct**, risk-based due diligence, audits, capability building, and remediation.

4) Quantitative Targets (Baseline: FY 2024–25 unless noted)

4.1. Training & Coverage

- 100% employees and 100% on-site contractors trained annually on Fair Labor & Non-Retaliation by **Q2 FY 2025–26**.

4.2. Wages & Hours

- 0 cases of wages paid below legal minimums; 100% **overtime premium** compliance each quarter.

4.3. Grievance & Remedy

- 100% grievances **acknowledged within 2 business days; ≥95% closed within 30 calendar days** (Q-over-Q).

4.4. Diversity & Inclusion

- Increase **women's representation** by **+5 percentage points** in operations and people-manager roles by **FY 2026–27**; ensure **pay-equity gap ≤5%** (like-for-like roles) by **FY 2026–27**.

4.5. Supply Chain

- 100% direct (Tier-1) suppliers sign the **Supplier Code** by **Q3 FY 2025–26**.
- Audit **≥80%** of high-risk suppliers by **FY 2026–27**; 100% high-risk non-conformities closed within **90 days**.

4.6. Freedom of Association & Dialogue

- Establish/strengthen **Joint Worker-Management Committees** at all sites by **Q4 FY 2025–26**; minimum **quarterly** meetings with published action logs.

5) Action Framework

5.1. Governance & Risk Management

- Appoint a **Fair Labor & Human Rights (FLHR) Steering Committee** (CHRO—Chair; Members: Site HR, EHS Lead, Procurement Head, Legal, CSR/ESG).
- Annual human-rights saliency assessment focusing on chemicals-sector risks (e.g., contract labor, migrant workers, working hours, dormitory standards, security practices).



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- Policy integration into HR, recruitment, security, contractor management, supplier onboarding, and management of change (MoC).

5.2. Safe & Respectful Workplaces

- Maintain robust **EHS management systems**; routine surveillance of ergonomics, heat stress, chemical exposure, and fatigue risk.
- Provide appropriate **PPE**, training, medical surveillance for high-hazard roles, and safe accommodation/transport where applicable.

5.3. Ethical Recruitment & Employment

- Written contracts in local language; no recruitment fees; transparent wage slips; accessible leave and benefits.
- **Young worker** registry and protections (no hazardous tasks; strict hour limits).

5.4. Worker Voice & Grievance

- Confidential, **non-retaliatory** channels (hotline/email/physical drop box) displayed in local languages.
- Clear **SLA**: acknowledge 2 business days; investigate; close/communicate outcome within 30 days; escalate complex cases to Steering Committee.

5.5. Supplier Engagement

- **Supplier Code of Conduct** and contractual clauses; risk-based screening at onboarding.
- Audits, corrective-action plans (CAPA), and capability building; **termination is a last resort** after attempted remediation.

6) Roles & Responsibilities

- **Board/Managing Director:** Oversight of human-rights performance and resourcing.
- **CHRO (Policy Owner):** Implements Policy, sets targets, reports performance, ensures non-retaliation.
- **Site HR Heads:** Local deployment, training, grievance handling, contractor oversight.
- **Line Managers & Supervisors:** Day-to-day compliance, respectful behavior, accurate timekeeping, swift issue escalation.
- **EHS Lead:** Safe-work systems and worker well-being integration.
- **Procurement Head:** Supplier Code rollout, risk screening, and CAPA closure.



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- **Internal Audit/Compliance:** Independent checks on wages, hours, disciplinary records, and grievance closure.
- **All Employees & On-site Contractors:** Comply with this Policy; report concerns in good faith.

7) Monitoring & Reporting

- **KPIs:** wage compliance, hours/overtime, grievance timeliness & closure, gender representation, supplier sign-offs/audits, audit findings & CAPA closure.
- **Internal audits** at least **annually**; results reviewed by the FLHR Steering Committee and **Management Review**.
- **External assurance/assessments** as appropriate (customer audits, certification bodies).
- Public **ESG/Sustainability Report** disclosure on progress and significant incidents.

8) Communication & Transparency

- Policy accessible on company channels and posted at sites in **English and local languages**.
- Induction and **annual refresher** for employees and on-site contractors.
- Publish **worker-management committee minutes** and grievance statistics (anonymized) quarterly on internal boards.

9) Continuous Improvement

- Annual benchmarking against peer best practices; refresh targets as performance improves.
- Corrective and preventive action (**CAPA**) discipline for any non-conformity; learnings shared across sites.

10) SDGs Advanced by this Policy

- **SDG 3** (Good Health & Well-Being),
- **SDG 4** (Quality Education),
- **SDG 5** (Gender Equality),
- **SDG 8** (Decent Work & Economic Growth),
- **SDG 10** (Reduced Inequalities),
- **SDG 12** (Responsible Consumption & Production),
- **SDG 16** (Peace, Justice & Strong Institutions),
- **SDG 17** (Partnerships).



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3 GOOD HEALTH AND WELL-BEING



4 QUALITY EDUCATION



5 GENDER EQUALITY



8 DECENT WORK AND ECONOMIC GROWTH



10 REDUCED INEQUALITIES



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



16 PEACE, JUSTICE AND STRONG INSTITUTIONS

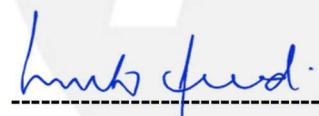


17 PARTNERSHIPS FOR THE GOALS



11) Review

- **Owner:** CHRO/ Head HR
- **Effective Date:** [01/04/2025]
- The ESG Steering Committee will update this Policy in response to **legal changes, audit findings, and stakeholder feedback.**


(Umesh Anand)



Managing Director

Date: Tuesday, 1st April, 2025

Place: Faridabad, Haryana, India

Last Review: 01/04/2025

Next Review: 31/03/2026



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12) Employee Acknowledgment – Fair Labor Practices Policy

I acknowledge that I have received, read, and understood HPL Additives Limited's **Fair Labor Practices Policy**. I understand my responsibilities to uphold these standards, including compliance with applicable laws, respectful conduct, and prompt reporting of concerns without fear of retaliation.

Employee Name: Kapil Kant Bhamlaej

Employee Signature: , Date: 05-04-2025