

1. BACKGROUND:

Our Company, that is Gujarat Fluorochemicals Limited, and its subsidiaries including GFL Americas LLC., GFL GmbH, GFL GM Fluorspar SA, GFCL EV Products Limited, GFCL Solar and Green Hydrogen Products Limited, Gujarat Fluorochemicals FZE Dubai, Gujarat Fluorochemicals Singapore Pte Limited, GFCL EV (SFZ) LLC, is committed to protecting human rights and prohibiting all acts of human trafficking, slavery, servitude and forced or compulsory labour throughout the organization, its business and its supply chain. In pursuance with the Modern Slavery Act 2015, the Company elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain.

This guideline sets out the steps that the Company as an organization has taken to ensure that no form of slavery and human trafficking exists in its business or supply chain.

2. THE COMPANY POLICIES

The Company is committed to ensuring that the organization and its supply chain are free from modern slavery or human trafficking in any form. The Company's internal policies and practices focus on anti-slavery and anti-human trafficking and are part of a larger effort to ensure transparency, accountability and safeguarding of human rights extended to its supply chain. These internal policies specify The Company's commitment to upholding human rights and prohibiting slavery, service, force la or, child labor and human trafficking. The Company expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with this Statement.

3. DUE DILIGENCE PROCESSES AGAINST MODERN SLAVERY AND HUMAN TRAFFICKING

As part of its initiative to identify and eliminate any modern slavery the Company

- a) shall operate in licensed premises strategically limited in geographical scope to ensure optimum control and supervision of the work environment.
- b) shall strive to build long-standing relationships with local suppliers and customers to effectively communicate its business standards.
- c) shall have in place whistleblowing and grievance redressal systems to encourage reporting of concerns and/or violations;
- d) implements programs for responsible labor sourcing processes by clarifying requirements to suppliers and put in place advanced screening processes and audits.
- e) shall conduct independent assessments through third-party tools and review the reports internally prior to the onboarding of any vendor/partner.
- f) shall undertake a supplier engagement program that integrates continuous evaluation, capacity building and risk management with a focus on human rights, labor practices and regulatory compliance through ongoing periodic assessments conducted by both external consultants and the internal audit team.

4. EFFECTIVENESS AND REPORTING

The company encourages and has in place a whistle-blowing process and a formal grievance redressal framework that enables everyone, including partners, contractors and employees, to raise their concerns at a single platform with complete confidentiality and has a strict 'non-retaliation' policy to save are the interest of whistle-blowers regarding violation in connection to this policy.

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4.1 If confronted with such an incident for violation of this Policy, it must be immediately rejected and reported to the company's Ethics Committee of the respective business comprising of the below:

1. Chief Executive Officer of the Business
2. Chief Finance Officer of the Business
3. Unit Head or Site Head/Functional Head as the case may be
4. Group Chief Finance Officer
5. Head- Group Corporate Human Resources
6. Company Secretary

The Company secretary shall be the "Company Ethics Officer" and any three members of the above list along with the Company Secretary shall form a quorum of the Ethics Committee. Similarly, if any employee or agent knows or believes that an improper gratification has been or shall be made, the employee or agent must also report such incident to the Ethics Committee. The Company's policy is that no adverse employment action will be taken against any personnel in retaliation or, honestly and in good faith, reporting a violation or suspected violation or suspected violation of anti-slavery and anti-human trafficking laws or this Policy.

The Company shall offer multiple mandatory trainings through various forums and workshops to its suppliers and employees responsible for supply chain management on anti-slavery and anti-human trafficking, specifically to identify such issues in the supply chain and respond in accordance with the applicable law. The Company's suppliers shall also be required to assess their businesses and supply chain to ensure compliance with the provisions of the Modern Slavery Act, Anti-Human Trafficking and other human rights requirements as incorporated under this statement.

4.2 The Company Secretary shall be the "Company Ethics Officer" any three members of the above List along with the Company Secretary shall form a quorum of the Ethics Committee. The Company's policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of related laws or this Policy.

4.3 Any employee (full time, part-time or employees appointed on an ad-hoc/ temporary/ contract basis), vendors, suppliers, contractors, consultants, service providers or any other agency or their representative doing any type of business with the Company as soon as he comes to know of any misconduct must report such incident to any members of the Ethics Committee.

4.4 The reporting of such incident normally should be in writing. In case the reporter is not willing to furnish a written statement of fraud but is in a position to give sequential and specific transaction of misconduct, then the Member of the Ethics Committee receiving the information shall record such details in writing as narrated by the reporter and also maintain the details about the identity of the official/ employee/other person reporting such incident.

4.5 Reports can be made in confidence and the person to whom the incident has been reported must maintain confidentiality with respect to the reporter and such matter should under no circumstance be discussed with any unauthorized person.

4.6 Member of the Ethics Committee receiving input about any such incident / nodal officer(s) shall ensure that all relevant records, documents and other evidence is being immediately taken into custody and being protected from being tampered with, destroyed or removed by suspected perpetrators of forced labour or by any other official under his influence.

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4.7 The Ethics Committee conduct preliminary verification of any suspected activity and conduct an appropriate investigation. Such an investigation can be vested to any other person or committee as the Ethics Committee deems fit.

4.8 After completion of the investigation, due & appropriate action, could include administrative action, disciplinary action, civil or criminal action or closer of the matter if it is proved that discrimination is not practiced etc. depending upon the outcome of the investigation, shall be undertaken.

Failure to comply with this guideline would attract disciplinary action and may include a reprimand, stoppage of increment, suspension without pay, demotion or dismissal/termination for more serious offences.

5 POWER TO AMEND:

- a. Any change of the guideline shall be approved by the Head – Group Corporate HR.
- b. The management shall have the overriding right to withdraw and/or amend the guideline at its own discretion as it deems fit from time to time. The decision of the management shall be final and binding.

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