



GUIDELINE ON EQUAL EMPLOYMENT OPPORTUNITY, CHILD LABOUR GENDER EQUALITY PROTECTION OF MINORITY RIGHTS

Guideline No

HR/64

1. BACKGROUND:

Our Company, that is Gujarat Fluorochemicals Limited and its subsidiaries is committed to the policy of Equal Employment. This commitment is an integral part of Company's mission to become an "Employer of Choice" – therefore all our HR Policies and Procedures reflect non-discriminatory practices and provide equal opportunity for all employees. As part of this commitment, all employees are expected to treat their colleagues fairly, with mutual respect and without harassment at all levels.

2. PURPOSE:

The purpose of this guideline is to outline the steps to ensure an Equal Employment Opportunity Working Environment exists within the company. This Guideline is applicable to all positions and in conjunction with recruitment, selection, appointment, training, learning and development, promotion, company activities and other terms and conditions of employment. The Company is committed to diversity and inclusion to drive business results and create a better future for diverse employees, global customers, partners, and communities.

3. POLICY FRAMEWORK:

We believe that a diverse workforce allows us to capitalize better on the growth opportunities available for us to match our growth ambitions and drive inclusion across the businesses. The Company prohibits any discrimination in employment including in hiring, compensation, promotion, or any other terms and conditions of employment, on the basis of gender, ethnicity, political affiliation, union membership, marital status, or any medical condition/status, including but not limited to maternity, post-maternity (nursing mothers), HIV & AIDS and Hepatitis B. The Company is committed to ensuring equal opportunities for all employee where men and women perform work of equal skills, effort and responsibility. However, there can be some affirmative action's with respect to persons with abilities.

We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions and Company Guidelines and Policies.

- a. The Company will take all actions to ensure that a conducive environment is provided to all employees to perform their role and excel in the same. No employee shall be discriminated in the Company by any employee for any reason attributable to his/her physical abilities.
- b. All Employees are personally responsible for treating each other with respect and dignity which includes respecting the rights and differences of others. Disrespectful behavior includes, but not limited to, the following –
 - i. Insult, ridicule, swearing and shouting in personal interaction and common places, over telephone
 - ii. Aggressive gesture
 - iii. Abuse
 - iv. Threatening, including that of loss of employment, and intimidating – both verbal and non-verbal
 - v. Violent behavior like slamming the door, table banging, throwing objects, etc
 - vi. Bullying which includes, but not limited to, constant criticism at work, impossible deadlines, constantly changing targets and assignments, assigning meaningless work or no work,
 - vii. Rude, unpleasant, inappropriate, and unprofessional, impolite, discourteous behavior that displays a lack of regard for others

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viii. Behavior that causes hurt feelings and distresses, disturbs, and/or offends others

c. Employment with the Company will be based on merit only regardless of gender, caste, creed, religion, physical ability of a person, ethnicity, political affiliation, union membership, marital status, or any medical condition/status, including but not limited to maternity, post-maternity (nursing mothers), HIV & AIDS and Hepatitis B.

d. Promotional opportunities will be based on performance, ability and potential, and will be consistent with the needs of the business. There shall be no discrimination based on gender, caste, creed, religion, physical ability of a person, ethnicity, political affiliation, union membership, marital status, or any medical condition/status, including but not limited to maternity, post-maternity (nursing mothers), HIV & AIDS and Hepatitis B.

e. There shall be no recruitment of child labour. This means that any young person under 18 shall not be employed as per the ILO standard. The Company shall not allow any Contractor to engage labour below the age of 18 years.

f. The Company's Pay structure shall be based on "Equal Pay for Equal Work" and there shall be no discrimination based on of gender, caste, creed, religion, physical ability of a person, ethnicity, political affiliation, union membership, marital status, or any medical condition/status, including but not limited to maternity, post-maternity (nursing mothers), HIV & AIDS and Hepatitis B.

g. Specially Aabled (Persons with Disabilities)

i. No applicant or employee will be discriminated against due to physical, sensory, intellectual, or mental disabilities.

ii. Reasonable accommodation, assistive devices, and workplace accessibility will be ensured.

iii. Equal opportunities will be provided in recruitment, career growth, training, and development.

iv. Sensitization programs will be conducted for employees and managers.

v. Appropriate infrastructural set-up (like Ramps, Table-tops etc) shall be provided to enable Specially abled personnel to work with efficiency.

h. Students (interns/Trainees)

i. Students engaged as interns or trainees will not be treated as cheap labour but as learners.

ii. Internships/traineeships will be structured to provide exposure, skill enhancement and mentoring.

iii. Equal opportunity will be given to student interns irrespective of educational institution, gender, caste, or disability.

iv. Stipends, benefits, and certifications will be provided in line with company policy and statutory guidelines.

4. GRIEVANCE REDRESSAL

The Company shall not tolerate harassment and behaviour that is discriminatory or behaviours that victimizes any individual or group in our workplaces based on any criteria of gender, caste, creed, religion, physical ability of a person, ethnicity, political affiliation, union membership, marital status, or any medical condition/status, including but not limited to maternity, post-maternity (nursing mothers), HIV & AIDS and Hepatitis B. Appropriate action basis investigation will be taken if any employee is found breaching this policy either through discrimination, harassment, bullying or victimizing other employee or by making false claims.

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4.1 Any employee who learns of a potential violation of this guideline is required to report his or her suspicion promptly to the Company Ethics Committee. Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct shall be protected against retaliation. All grievances and complaints shall be taken seriously and treated with sensitivity and fairness. 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 following incumbents:

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 and 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 for, honestly and in good faith, reporting a violation or suspected violation of the applicable laws or this Policy.

The Company shall offer multiple mandatory trainings through various forums and workshops to its suppliers and employees responsible specifically to identify such issues in the company and respond in accordance with the applicable laws. The Company's suppliers shall also be required to assess their businesses and supply chain to ensure compliance with the provisions of the Act and other requirements as incorporated under this Statement.

4.2 The Company Secretary shall be the "Company Ethics Officer" and any three members of the above List and 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 anti-corruption laws or this Policy.

4.3 Any employee (full time, part time or employees appointed on adhoc / 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 discrimination must report such incident to any member 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 discrimination, 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 the confidentiality with respect to the reporter and such matter should under no circumstances be discussed with any unauthorized person.

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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.

4.7 The Ethics Committee, conduct preliminary verification of any suspected activity and conduct a appropriate investigation. Such 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, which could include administrative action, disciplinary action, civil or criminal action or closure of the matter if it is proved that discrimination is not practiced etc. depending upon the outcome of the investigation, shall be undertaken.

5. BREACH OF THIS POLICY

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behavior, she/he will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, stoppage of increment, suspension without pay, demotion or dismissal/ termination for more serious offences.

6. 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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