

	GUIDELINE ON PROHIBITION OF FORCED/BONDED LABOUR/SLAVERY AND FREE WILL (AT-WILL) EMPLOYMENT	Guideline No
		HR/61

1. BACKGROUND:

Article 23(1) of the Constitution prohibits “begar” and other similar forms of forced labour and it provides that any contravention of the said prohibition shall be an offence. Bonded Labour System (Abolition) Act, 1976 was promulgated by the Indian Parliament to provide for the abolition of bonded labour system with a view to preventing the economic and physical exploitation of the weaker sections of the people and for matters connected therewith or incidental thereto.

Our Company, 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 providing work environment that ensures every employee is treated with dignity, respect and afforded equitable treatment. The Company strictly prohibits the deployment of forced labour and human trafficking in all company operations across the group. The company strictly believes in “NO FORCED/BONDED LABOUR”.

2. SCOPE:

This policy applies to all categories of employees of the Company, including Management, Workmen, Apprentices and Employees on contract at our workplace, premises and precincts, and including all offices, godowns, etc of Gujarat Fluorochemicals Limited and its subsidiaries.

3. POLICY:

a. The Company ensures that employees working in our establishment/factory are doing so voluntarily and does not engage in or support the use of forced labour.

b. The Company do not engage in or support the use of Forced / Bonded Labour in any of our manufacturing activities / allied activities whether in existence or to be opened in future.

c. All the Administrative Heads of any Facility of the Company shall promote advice and shall ask its sub-contractor / vendors to discourage the engagement of Forced / Bonded Labour being clear case of violation of law of land.

d. Personnel shall have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment provided that they give reasonable notice to their employer. This is in compliance with Indian Bonded labour system (abolition) Act, 1976 and the contract labour (regulation and abolition) Act, 1970.

e. Neither the company nor any entity supplying labour to the company shall withhold any part of any personnel’s salary, benefits, property, or documents in order to force such personnel to continue working for the company.

f. Neither the company nor any entity supplying labour to the company shall engage in or support trafficking in human beings.

g. All employees shall be informed of the terms of their employment i.e. job description, hours of work etc

h. The Company does not engage or support vendors & suppliers who resort to using forced labor in their operations.

i. The Company shall not keep permanently any original documents like educational certificates, Identity documents, Date of Birth Certificates, Domicile documents etc of any employee but will only ask for deposition of such documents for verification purposes only.

j. Employment with the Company is based on the principle of free will (at-will employment).

[Back to Index](#)

Rev.	Date	Approved by	Guideline No	Page
13	01.01.2026	Head (Group Corporate Human Resources)	HR/61	1 of 3

 GUJARAT FERTILISERS LIMITED An INOX Group Company	GUIDELINE ON PROHIBITION OF FORCED/BONDED LABOUR/SLAVERY AND FREE WILL (AT-WILL) EMPLOYMENT	Guideline No HR/61
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i. Either the employee or the Company may terminate the employment relationship **at any time, with or without cause, and with or without notice**, subject to compliance with applicable laws.

ii. Nothing in this policy or in any Company Communication (written or verbal) shall be construed as creating a guarantee of continued employment for any specific duration, unless a written contract signed by an authorized Company representative explicitly provides otherwise.

iii. **Mutual Choice** – Employees are free to resign their employment at any time. Similarly, the Company reserves the right to discontinue employment, subject to statutory and contractual obligations.

iv. **Non-Discrimination** – Decisions regarding termination will not be based on race, gender, disability, religion, age, caste, political affiliation, or any other protected characteristic.

v. **Legal Compliance** - While the principle of free will applies, all actions will remain compliant with:

- Applicable labour and employment laws of the country
- Statutory requirements for notice, severance pay, or retrenchment (if applicable)
- Employment agreements, if executed

vi. **No Implied Contract** – No supervisor, manager, or representative of the Company (other than through written, authorized employment agreement) has the authority to alter the at-will employment relationship.

vii. **Implementation Measures**

Offer Letters: All appointment letters shall clearly state the free will (at-will) nature of employment.

- **Employee Handbook:** This policy shall be incorporated in the Company's Employee Handbook and explained during induction.
- **Exit Procedure:** Employees exiting under this policy will be processed in accordance with statutory obligations (final settlements, provident fund, gratuity, etc).
- **Jurisdiction Exceptions:** In India and other jurisdictions where at-will employment is not recognized, this clause will be subject to the **Industrial Disputes Act, 1947, Shops & Establishment Acts**, or other local laws.

4. FORCED/BONDED LABOUR PREVENTION FRAMEWORK & COMPLIANCE

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.

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 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

[Back to Index](#)

Rev.	Date	Approved by	Guideline No	Page
13	01.01.2026	Head (Group Corporate Human Resources)	HR/61	2 of 3

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 forced/bonded labour laws or this Policy.

The Company shall offer multiple mandatory trainings through various forums and workshops to its suppliers and employees responsible 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 Forced/Bonded Labour 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 the related 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 forced/bonded labour 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, 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 matters should under no circumstances 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.

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

4.1.1 COMPLIANCE

Breach of this Policy will not be tolerated and will be liable to be subjected to disciplinary action, which may extend up to suspension and dismissal from service.

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:

[Back to Index](#)

Rev.	Date	Approved by	Guideline No	Page
13	01.01.2026	Head (Group Corporate Human Resources)	HR/61	3 of 3