

HUMAN RESOURCE MANUAL	GUIDELINE ON PROTECTION OF HUMAN RIGHTS	Guideline No
		HR/63

1. BACKGROUND:

Our Company, that is Gujarat Fluorochemicals Limited and its subsidiaries is committed to respect human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognized frameworks including the Social Accountability 8000 International Standard and its associated international instruments.

In line with the UN Guiding Principles on Business and Human Rights, the company recognizes the corporate responsibility to respect these principles and commit to ‘know and show’ this through ongoing human rights due diligence. Furthermore, our efforts include ongoing robust engagement with our business and major supply chain partners to mitigate potential human rights impacts beyond our direct control. Our support of internationally recognized Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

2. POLICY OBJECTIVES:

The objective of this guideline is to provide an overview of expectations for employees and business partners. In addition, the Human Rights guideline exists to:

- 2.1 Inform employees, business partners and customers of Company’s commitment to human rights.
- 2.2 Establish Company commitment to ‘know and show’ its respect for human rights through on going human rights due diligence.
- 2.3 Maintain high ethical standards of the Company.
- 2.4 Treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

3. APPROACH:

The Company conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognized Human Rights. Our commitment to respecting and protecting human rights applies to all the locations, operating companies and business operations worldwide. With this guideline, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

a) In Our Operations

We expect each employee to act lawfully toward other employees, colleagues, business partners and those in local communities. We ensure protection of company employee rights and entitlements through policies and procedures. All new and current employees are required to go through this guideline. We use reasonable organizational, technical and administrative measures to protect personal information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us.

b) In the Supply Base

We expect our business partners – including suppliers and customers -- to share our commitment to respect human rights. All suppliers must comply with our commitment to human rights, which is set forth in this guideline. Information shall not be collected unless it is for lawful purpose, and is considered necessary for the purpose. Negligence in implementing and maintaining reasonable security practices and procedures may make a person liable to disciplinary action.

c) In the Community:

As an employer and a corporate citizen, we are aware of our role in the communities in which we operate. We respect the rights of local communities and those that live and work there consistent with international human rights standards. We continuously monitor and address the environmental impacts of our business operations on our neighbors, and strive to create positive impacts on adjacent communities through local engagement and charitable programs. [Back To Index](#)

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4. HUMAN RIGHTS PROTECTION FRAMEWORK & COMPLIANCE

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 member 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 related 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 member 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 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 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.

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.

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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.

Employees and suppliers are expected to comply with this and all applicable company policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination or termination of contract. In case of our business partners, where we have sound reason to believe that our partner organizations infringe Human Rights, we reserve the right to cease those relationships as warranted.

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.

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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