

# Social Accountability & Human Rights

Progress Report  
2021-22



## Ensuring Dignity, Freedom & Justice for All

Gujarat Fluorochemicals Limited  
10<sup>th</sup> December, 2022

# Contents

02	From the Desk of Chief Executive Officer (CEO)	18	Our Commitment to Human Rights
03	Message from Head Group Corporate Human Resources	20	Our Approach
04	About Us	21	Governance
06	Meet our Chairman	22	Materiality & Stakeholder Engagement
07	GFL at a Glance	24	Training & Communication
09	Who We are	25	Conducting Human Rights Impact Assessment & Due Diligence
10	Our Presence	27	Supply Chain & Our Operations Presence
12	Our Manufacturing and R&D Facilities	28	Responsible Sales & Marketing & Human Rights
13	Our Businesses	30	Salient Human Rights Issues, Taking Action & Results
14	We are Signatory to	46	Annexure – 1 UNGC Principles Reporting Framework Index
15	GFL HR Principles	47	Annexure – 2 Mapping Our Labour & Human Resource Actions in support of Human Rights & SDG
16	Our Human Rights Journey	49	Annexure – 3 Mapping of GFL's HR Principles with various Sustainability Standards & UN Human Rights
		51	Annexure – 4 Assurance Statement 2022



To know more about the Company, please refer to our Annual Report at the link below:

<https://gfl.co.in/upload/pages/591aac25d2118d9b5d9a10b48a685415.pdf>

Gujarat Fluorochemicals Limited is committed to respecting the 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, UN Global Compact principles, ISO26000, ISO20400, UN Women Empowerment Principles (WEPs), National Voluntary Guidelines on Social, Environment & Economic Responsibilities (NVGSEER) and in compliance with all applicable laws and regulations, including while being committed and continues to improve these practices over the years. As a signatory to United Nations Global Compact, the Company has demonstrated its commitment to protecting and respecting Human Rights.

The report is structured in accordance with UN Guiding Principles Reporting Framework (Annexure 1). This report has been reviewed and assured independently by DQS India as depicted in Annexure 4 – Assurance Statement by DQS India.

### Report Boundary

Our Social Accountability & Human Rights Progress Report is a description of where we impact and thus, we define our reporting boundaries. Our reporting boundaries include the Domestic locations (Dahej A, Jolva (Dahej B), Ranjit Nagar, Vadodara, and Noida) & International Locations (Germany & USA), the immediate community, and important business partners.

### Reporting Period

This Report considers the primary reporting period as April 01, 2021, to March 31, 2022. However, some sections of the report represent facts and figures till November, 22 ends.

### Stakeholder Feedback

We welcome and appreciate any constructive input and feedback from the stakeholders at:

**Email:** [kallolchakraborty@gfl.co.in](mailto:kallolchakraborty@gfl.co.in); [chandni.mehta@gfl.co.in](mailto:chandni.mehta@gfl.co.in)

**Mailing address:** INOX Towers, Plot no: 17, Sector 16 A, Noida – 201301 (UP), India

**Website:** [www.gfl.co.in](http://www.gfl.co.in)



The next edition will be published in 2025.

## From the Desk of Chief Executive Officer (CEO)

It is an honor for me to participate in today's commemoration of International Human Rights Day and to have the chance to address such a significant subject. It is a day set aside to remember when the Universal Declaration of Human Rights was signed, emphasizing the important progress made toward achieving equality and the unity of the entire human race.

This year's theme is 'Dignity, Freedom, and Justice for All' which is a call to action to stand up for human rights. At GFL, we stand for our continued commitment to upholding Human Rights and we have continued to evolve and deepen our understanding of the role we play in advancing respect for human rights. Our approach to upholding human rights is based on United Nations Guiding Principles on Business and Human Rights and is centered around four core pillars: i) embedding respect for human rights throughout our value chain; ii) conducting ongoing human rights due diligence; iii) engaging our stakeholders and driving collaborative action; and iv) providing effective grievance mechanisms and access to remedies.

While we are pleased with our progress so far, we recognize that it is only a stepping stone on our journey. We are all aware that there is still much work to be done to ensure that human rights are fully respected throughout our value chain and that we are committed to regularly reporting our progress and increasing transparency in our operations. This report is about discovering our human rights journey, highlighting our progress and learnings so far, and indicating the work that remains ahead.

Thank you for your continued support in our human rights journey. I encourage all of our stakeholders to read the report, offer their thoughts, and join us to uphold and advance social responsibility and human rights across our value chain and the larger societies we serve.

Regards  
**Bir Kapoor**

## Message from Head Group Corporate Human Resources

The past decade have seen GFL establish a reputation based on respect and trust. GFL has always been dedicated to maintaining this reputation by upholding human rights, standards of excellence, and integrity across the complete value chain. This commitment was recently reinforced by our compassionate response to the global pandemic. We took steps to protect our employees, and support their families, and the communities around us. We are still doing so!

We believe that Human rights cannot and should not be reduced to 'ticking boxes' for any company committed to doing business responsibly. It is an important component of Environmental, Social, and Governance (ESG) policy and must be driven from the top down, actively engaged, and expanded across the value chain. No one in the entire ecosystem surrounding a business should be denied their human rights.

At GFL, we consider ourselves not just in a profession, but in a mission - a mission that is based on the philosophy of - "Show, Not tell" which means that we strive to translate human rights guidance into meaningful action, and all our actions are strongly aligned with human rights principles; to empower people to build community and bring the world closer together. With this conviction, we hereby publish our third Social Accountability & Human Rights Progress Report 2021-22 emphasizing our commitment to protecting, and respecting the human rights of all the stakeholders throughout our locations, operating companies & business operations, worldwide.

I would like to express my gratitude to everyone who has been a part of and contributed to this journey.

Regards  
**Kallol Chakraborty**



# About Us

## A closer look at Inox GFL Group

The Inox GFL Group, with a legacy of more than 90 years, is one of the largest business Group's in India. The Group is a forerunner in diversified business segments comprising specialty chemicals, fluoropolymers, gases, wind turbines and renewables. The Group, with three listed entities, currently has a market capitalisation of ~ USD 5 bn



## Chemical business

### Gujarat Fluorochemicals Limited

A Leading chemical company with over 30 years of experience in fluorine chemistry, GFL is India's largest producer of fluoropolymers. It also manufactures refrigerants, chemicals and fluorospecialties for its customers worldwide.

### GFL EV Products Limited

GFL EV offers a range of solutions for the entire value chain of batteries, battery components and products for electric vehicles.

### GFL Solar & Green Hydrogen Products Limited

GFL Solar & Green Hydrogen Products provides fluoropolymer solutions for the entire value chain of solar power systems and green hydrogen production including proton exchange membranes for electrolyzers and fuel cells.

### Gujarat Fluorochemicals FZE, Dubai ('GFL Dubai')

GFL Dubai is engaged in the business of trading and processing of refrigerants and polymers.

### Gujarat Fluorochemicals LLC, USA ('GFL America')

GFL America is engaged in the business of trading and warehousing of all fluoropolymers.

### Gujarat Fluorochemicals GmbH ('GFL Germany')

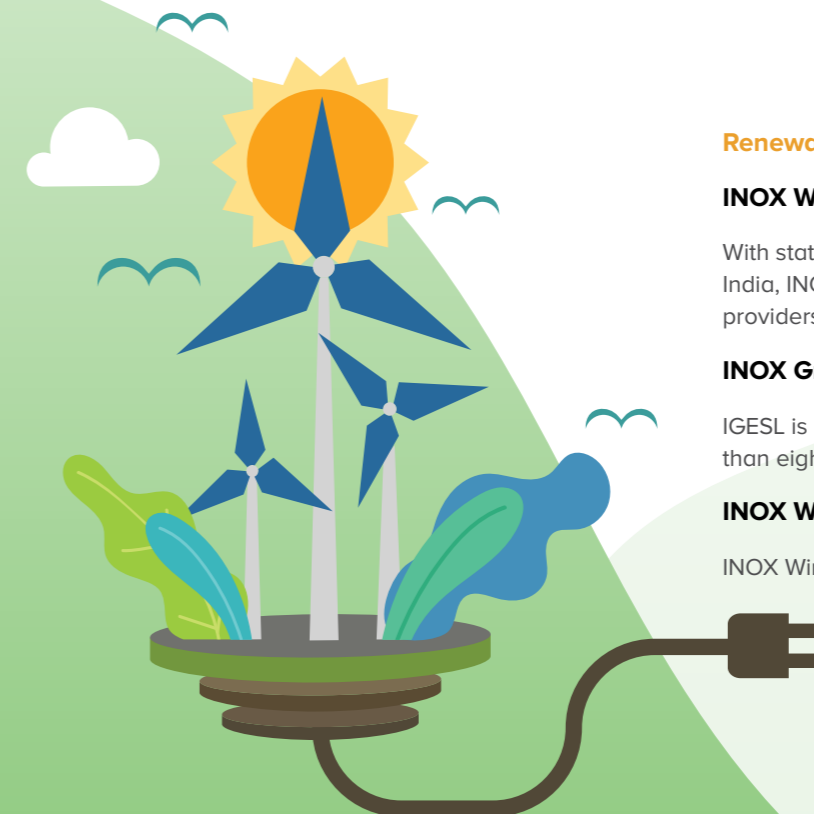
GFL Germany is engaged in the business of trading and warehousing of all fluoropolymers.

### Gujarat Fluorochemicals Singapore Pte Limited ('GFL Singapore')

The Company has been set up for the purpose of investment activities. The Company has invested in joint venture in Morocco for mining of fluorspar.

### GFL GM Fluorspar SA ('GFL Morocco')

GFL Morocco is engaged in the business of exploration of fluorspar mines.



## Renewable energy business

### INOX Wind Limited

With state-of-the-art manufacturing plants spread across India, INOX Wind is one of the largest wind energy solution providers in the market.

### INOX Green Energy Services Limited ('IGESL')

IGESL is India's leading wind O&M services player with more than eight years of operating history.

### INOX Wind Energy Limited

INOX Wind Energy Ltd is the holding company of Inox Wind.

# Meet our Chairman



## Shri Vivek Jain is the chairman

of the Inox GFL group, which he inherited from his father, Devendra Jain after the patriarch divided the family's assets in 2021 between him and his brother, Pavan Jain.

A graduate from St. Stephens and an MBA from the elite Indian Institute of Management, Ahmedabad, Jain started working with his father in 1978 in what was then a paper trading business.

Today, the flagship company of his group is Gujarat Fluorochemicals, a manufacturer of chemicals and industrial gases, which he helped his father set up.

His son, Devansh Jain runs the Renewable Energy Business of the Group which consists of Inox Wind, Inox Green Energy Services Limited, and Inox Wind Energy Limited.



# GFL at a Glance



## Leading

Producer of Fluoropolymers in India



## 2,000+

Employees worldwide



## 20%

Five year CAGR growth



## 30 Years

In Fluorine chemistry

Guiding principles of Hum-  
1st Jun



## Integrated Operations

Vertical integration from natural minerals to most value added products: Fluoropolymers and Fluorospecialities.



## Strong Customer Engagement

Problem-solving on a partnership basis for handling and resolving application requirements.



## Research and Innovation

State of the art R&D facilities leading to gradual expansion of Fluoropolymers portfolio. In-house technology for Fluorospeciality molecules



## Established in Key Markets

Sustained presence as a reliable supplier across Europe, Asia and Americas.

## GFL at a Glance

Each INOX Group company is characterised by the growth DNA of the Group that can be encapsulated in the following:



### Chemical Business



- Gujarat Fluorochemicals Ltd, leading Indian Chemicals Company.
- Business verticals: Fluoropolymers, Fluorospecialties and Chemicals.
- The only PTFE/fluoropolymer manufacturer in India.
- Developing products/grades catering to new age businesses viz. EV- batteries, Solar panels and Hydrogen fuel cells.

### Renewable Energy Business



Inox Wind Energy Ltd.

- Inox Wind Ltd is a fully integrated player in the wind energy market and provides end-to-end turnkey solutions.
- INOX Green Energy Services Limited is India's leading wind O&M services player with more than eight years of operating history.
- Inox Wind Energy Ltd is the holding company of wind business.

## Who We Are

Growing with innovation, integration and professionalism

Established in 1987, Gujarat Fluorochemicals Limited (GFL) has emerged as an acclaimed and major player in the Fluoropolymers, Fluorospecialties and Refrigerants space thanks to its unrelenting R&D efforts, extensive integration throughout the value chain, and professional work ethics.



### Vision

What we aspire to do

- To become preferred suppliers of Fluoropolymers, Fluoroelastomers and Refrigerants globally and achieve this through Technological, Operational and Service excellence.
- We shall endeavour to be a global player in our businesses.
- We shall constantly endeavour to delight customers, workforce and all the stakeholders.
- We shall do our business-exercising utmost care of environment and society.



### Mission

How we do it

We shall endeavour to always be the market leader by providing our customers the latest, the most innovative and the best available technologies, products and services. Through this, we shall provide our customers the best 'Value for Money' by producing best-in-class quality products at most competitive prices. We shall conduct our operations keeping Safety and Environment in place along with upgradation of technology.



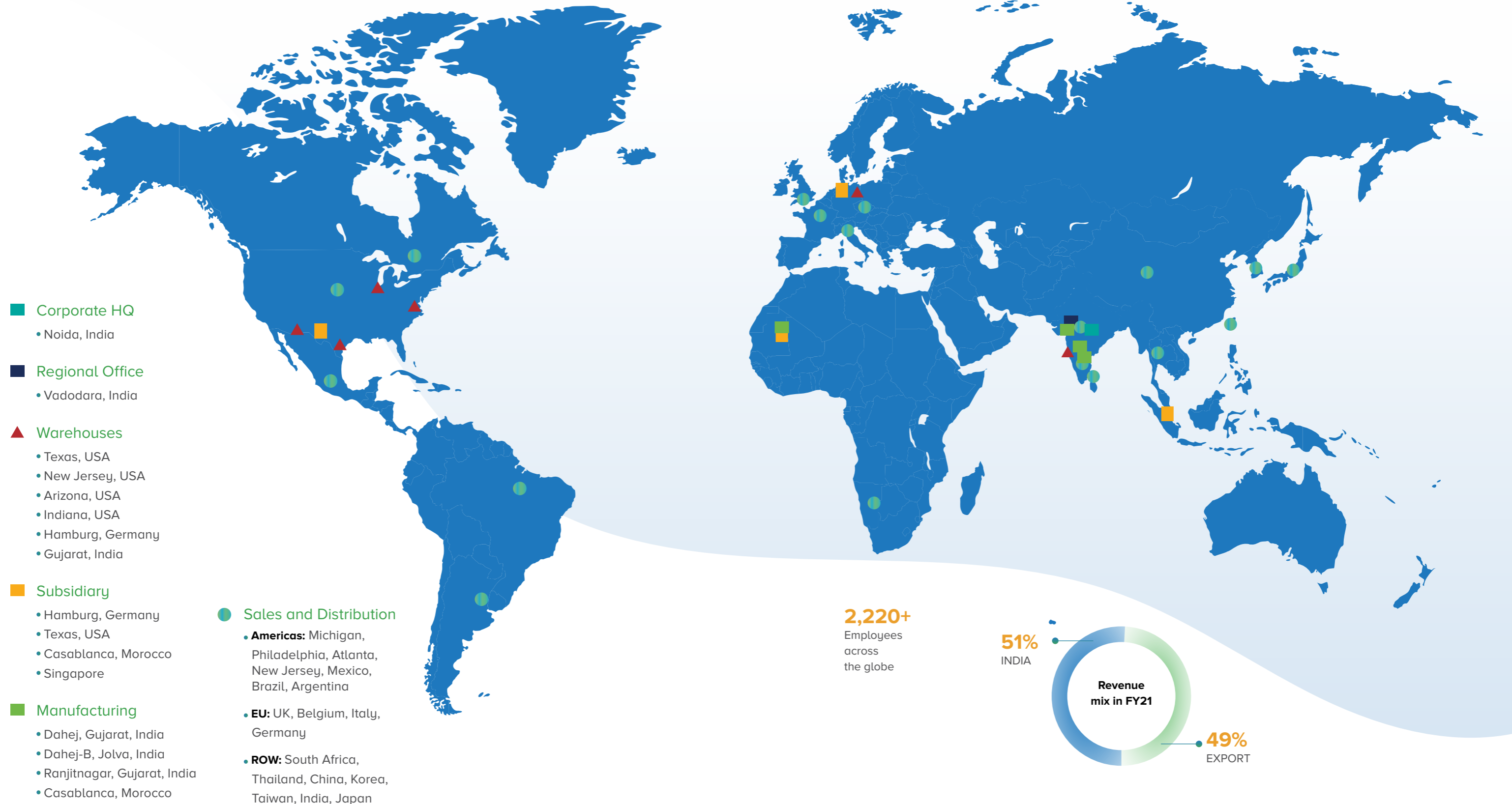
### Our credo

What we believe

- Quality:** Excellence in quality.
- Excellence:** Excellence in services and manufacturing practices for our stakeholders.
- Integrity:** Building trust in dealings with all stakeholders.
- Innovation:** Enthuse our customers through our innovative approach.
- Customer value:** Delight the customer and deliver the value.

# Our Presence

Expanding further



# Our Manufacturing and R&D Facilities



## Dahej, Gujarat, India

- Fluoropolymers, Specialty and Bulk Chemicals
- Commissioned in 2007
- Largest Fluoropolymer Plant in India
- Vertically Integrated Plant
- ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 certified.



## Ranjit Nagar, Gujarat, India

- Speciality Chemicals and Refrigerants
- Commissioned in 1989
- Largest Refrigerant capacity in India
- ISO 9001:2015, ISO 1400:2015 and ISO 45001:2018 certified



## Jolva, Gujarat, India

- Fluoropolymers, Specialty and New age Chemicals
- Under phased commissioning



## Regulatory compliances



ROHS-Restriction of Hazardous Substances



USP Class VI- United States Pharmacopeia



REACH- Registration, Evaluation, Authorization and Restriction of chemicals



SVHC- Substances of very High Concern



3A- Sanitary Standards for design and fabrication of equipment



EC10/2011-European Commission



FDA-Food and Drug Administration



EC1935/2004-European Commission



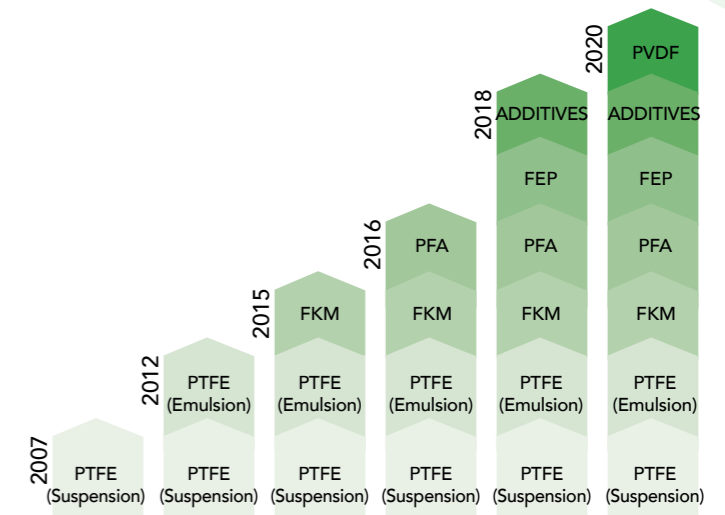
WRAS-Water Regulation Advisory Scheme

# Our Businesses

## Committed to create value through green chemistry

GFL holds domain expertise in four major product verticals—Fluoropolymers, Fluorospecialties, Refrigerants and Chemicals. Our steadfast focus and attained expertise in Fluorine Chemistry enable us to develop manufacture and commercialise Fluorine - based products in record time complying to most regulatory requirements. Our vertically integrated operations and access to key raw material has facilitated leadership in wide range of Fluoropolymers and Speciality chemicals for varied applications in automotiva modern architecture, pharmaceuticals, chemical processing energy and telecommunications industry. Committed to greener processes and practices, we constantly strive to make our products sustainable and environment-friendly.

## Product expansion



## Fluoropolymers

GFL is a leading producer of Fluoropolymers in India with major product lines being PTFE additives and Polymer Processing Aids (PPA).

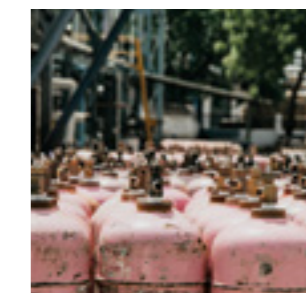
- PTFE
- PFA
- FEP
- FICM
- PVDF
- ADDITIVES



## Speciality Chemicals

GFL produces EDFA, TEOF, BTFM, DFMS, DCTFMA as Fluorospeciality Chemicals for Wide-ranging industrial applications.

- HF BASED
- TFE BASED
- KF BASED



## Refrigerants

GFL operates one of the single largest and most efficient Refrigerant plants in India manufacturing R22, R32, R125, R407C, R410A.

- R-22
- R-32
- R-410A
- R-407C



## Chemicals

GFL manufactures industrial chemicals for end-use industries including Pharma, Agrochemicals and Plastics.

- Caustic Soda
- Carbon Tetrachloride
- Chlorine
- Methylene di Chloride
- Hydrochloric Acid
- Sodium Hydrogen Sulphate
- Hydrogen Gas
- Fluorspar
- Anhydrous Hydrogen Chloride

## We are signatory to



## We adhere to



## GFL HR Principles

Our Responsible Business Practices are structured around the three independent but interrelated pillars of the 'Protect, Respect & Remedy' Framework for ensuring protection of human rights. Our Social Accountability & Human Rights related policies are based on a set of HR Management Principles that are the fundamentals of operational practices to ensure social accountability and responsibility across the value chain. Listed below are the 10 Principles of Human Resource Management at GFL.

### Guiding principles for human resource management in Gujarat Fluorochemicals limited

At GFL, we recognize that our employees are the key to Company's success.

For us, the continuous development and engagement of our human resources is a business imperative.

To achieve the company's mission, vision, and goals, the human resource function of the company shall adopt

### " 10 PRINCIPLES of human resource management of GFL" and operate all its processes based on the same

- 1 Build a safe, healthy, and secure workplace with the involvement of all employees.
  - 2 Implement a robust, fair, transparent, and non-discriminatory process to attract, develop and retain the talent needed for business delivery and growth.
  - 3 Uphold and respect human dignity, equality, and human rights in the workplace.
  - 4 Provide continuous learning opportunities for the growth and development of all employees
  - 5 Ensure continuous two-way communication and participation of all employees and respect their views and opinion and involve them in decision making.
  - 6 Establish meritocracy without any bias or discrimination in connection to performance evaluation, career progression, rewards, and recognition.
  - 7 Pay for performance based on internal and external parity.
  - 8 Encourage creativity and innovation to fuel growth.
  - 9 Create an engaged work environment of teamwork and camaraderie with a bias for responsible execution and excellence.
  - 10 Drive social accountability and responsibility and ensure ethical governance for responsible execution and excellence.
- To implement the above principles the human resource function shall:**
- Design and establish robust operational policies, processes, and procedures in all aspects of human resource management.
  - Continually improve the same to bring in the right practices to enable growth.
  - Educate all employees on the same for their understanding and appreciation.
  - Follow the rule of the land and all international standards as applicable to labor and social accountability.

# Our Human Rights Journey

2019

**Mar, 2019**  
GFL signs science based target call to action commitment letter.

**Apr, 2019**  
GFL announces first sustainable procurement policy and Code of Conduct for Suppliers/ Vendors and Service Providers.

**Apr, 2019**  
GFL launched Guideline on Protection of Human Rights based on the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

**May, 2019**  
GFL became a signatory to United Nations Global Compact (UNGC).

**Jun, 2019**  
GFL adopts guiding principles for Human Resource Management which included upholding and respect of Human Dignity, Equality & Human Rights.

**Jul, 2019**  
GFL initiated Corporate Social Accountability Policy.

**Jul, 2019**  
GFL developed and launched HR Principles & Social Accountability policy in line with the UN Declaration of Human Rights including all our vendors, contractors and business partners.

**Sep, 2019**  
GFL initiated DQS Supplier Sustainability Audit Management System for supplier sustainability audit and compliance.

**Sep, 2019**  
GFL uploaded its first CDP Report.

**Nov, 2019**  
GFL launched Ethics Line Digital Platform for reporting policy violations.

**Nov, 2019**  
GFL establishes Social Accountability, Regulatory & Sustainability Corporate Steering Committee.

**Dec, 2020**  
GFL organized its first Awareness session on Women Empowerment for all the women employees.

**Oct, 2020**  
GFL Published its first Sustainability Report 2019-20.

**Sep, 2020**  
GFL published its first Integrated Annual Report 2019-2020.

**Sep, 2020**  
GFL uploaded its second CDP report.

**Aug, 2020**  
GFL adopted ISO 20400 Sustainable Procurement Standards to build strong, long term relationships with suppliers, vendors and service providers.

**Aug, 2020**  
GFL adopted the ISO 26000 standards on Social Responsibility.

**Jul, 2020**  
GFL gets ISO37001 (Anti Bribery Management System). certified.

**Jun, 2020**  
GFL established Corporate Women Empowerment committee and circulated charter.

**Jun, 2020**  
GFL established Corporate Women Empowerment committee and circulated charter.

**Jun, 2020**  
GFL signed the UN Women and UNGC Women's Empowerment Principles exemplifying its commitment to Gender Equality and Women Empowerment.

**Jun, 2020**  
GFL announced Ethics Committee.

**Apr, 2020**  
GFL announced Responsible Sales & Marketing policy.

**Mar, 2020**  
GFL launched guideline on Responsible Care.

**Feb, 2020**  
GFL became signatory to Principles of Responsible Care under Indian Chemical Council.

**Feb, 2020**  
GFL gets SA8000 certified.

**Jan, 2020**  
GFL gets ISO27001 certified.

2020

2021

**Mar, 2021**  
GFL gets a 'Silver' medal in Ecovadis assessment.

**May, 2021**  
GFL won 'GOLD' award in the category - 'Best Sustainability Report (First Time)' at the 6th Asia Sustainability Reporting Awards (ASRA).

**June, 2021**  
ISO37001 (Anti Bribery Management System) Surveillance Audit completed at GFL with scope increased to International locations.

**July, 2021**

- GFL launched Guideline on Special Leave for Employees
- GFL launched Guideline on Work from Home for Employees
- GFL launched Guideline on Free Transportation to Women Employees

**Aug, 2021**

- Undertaken a Women Wellness Initiative – tied up with 'M Fine' for providing wellness benefits to Female employees
- Launched digital 'Prayas', a suggestion scheme for employees across the company
- Launched 'Odventure', our online Learning Management System across the company
- GFL gets ISO26000 reassurance with the scope increased to International Locations
- GFL gets ISO 20400 reassurance

**Sep, 2021**

- 1st Workplace wellness survey conducted across Company
- GFL conducted its first SDG Campaign along with UNGC on the SDG Day across locations

**Oct, 2021**

- SA8000 2nd Surveillance audit completed for the manufacturing sites – Dahej & Ranjitnagar
- GFL published its second Integrated Annual Report 2020-21
- Human Rights Awareness Campaign conducted across the company

**Nov, 2021**

- First virtual HR Townhall meeting held across the Company
- GFL conducted first Human Rights Compliance Assessment by third party - DQS

**Dec, 21**  
Published second Social Accountability & Human Rights progress report 20-21 on International Human Rights Day

**Nov, 2022**

- First Virtual CEO Town Hall meeting held across the company
- Human Rights Awareness campaign conducted across locations
- Conducted second Human Rights Compliance assessment by external agency – DQS India

**Oct, 2022**  
GFL uploaded its fourth UNGC Communication of Progress (COP) in GC Advanced level.

**Sep, 2022**

- ISO 26000 reassurance completed at GFL with scope increased to our new site – Jolva
- Launched wellness initiative – Every Sunday is Yoga Day across all locations
- Launched WASH awareness booklet along with an online training program for employees
- GFL conducted its second SDG campaign along with the UNGC team across locations

**Aug, 2022**

- ISO 37001 second surveillance audit completed at GFL with scope increased to our new site – Jolva

**June, 2022**

- Launch of Inhouse online Library 'Athena'
- GFL get certified in accordance with Anti-competitive & Anti-trust principles based on the competition act 2012.

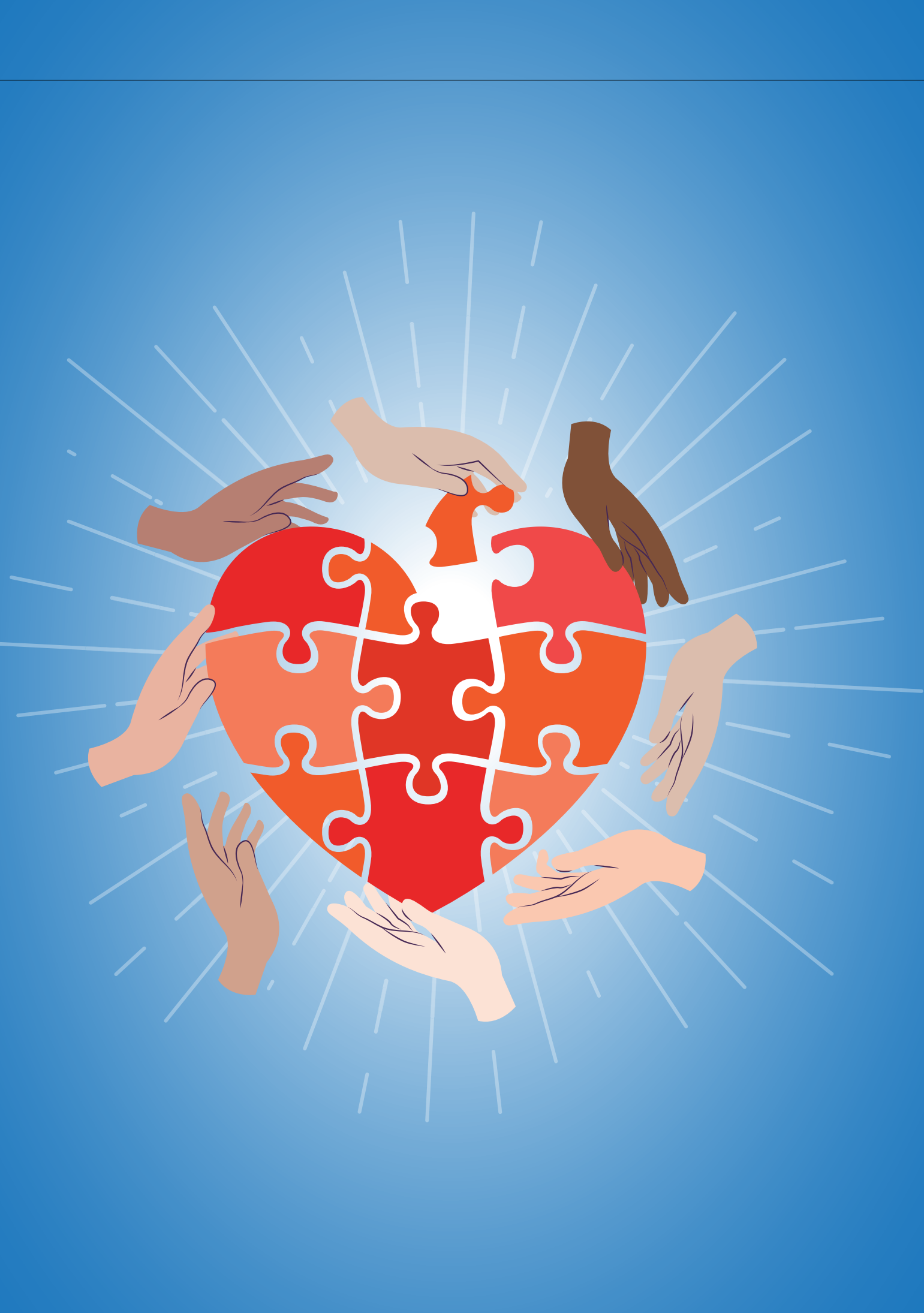
**May, 2022**  
Launched the first Women Empowerment and Diversity Progress Report 21-22.

**Apr, 2022**  
Launch of Ranjit Nagar Handicraft website for Economic Upliftment of Women.

**Mar, 2022**

- Conducted its first campaign - Break the Bias on International Women's Day
- Launched the 'WASH' initiative across locations on World Water Day
- GFL gets 'GOLD' in Eco-Vadis Assessment
- GFL Launch 'I am a Safety Leader' programme on National Safety Day

2022



## Our Commitment to Human Rights

**Our Commitment to Human Rights is encapsulated in our Human Rights Policy and reflects our understanding that these rights are not discretionary but an entitlement of all people.**

Our Human Rights policy is our public commitment and is available on our website at the link below: <https://gfl.co.in/upload/pages/b9e54337554bac5bf2c0049f0def3e83.pdf>. Our business model and strategy do not, by their essential nature, pose significant risks to potential human rights.

The Company is committed to respecting the human rights of its 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 SA8000 International Standard, UN Global Compact principles, ISO26000, National Voluntary Guidelines on Social, Environment and; Economic Responsibilities and in compliance with all applicable laws and regulations.

Our commitment to human rights is further augmented through our participation in various international initiatives like the UN Global Compact, UN Women Empowerment Principles (WEPS) & WASH under WBCSD.

The Company, being a signatory to UN Global Compact is committed to:

### 1. Sustaining and upholding the UNGC Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption.

Our Responsible Business Practices are structured around the three independent but interrelated pillars of the 'Protect, Respect & Remedy' Framework. Our policy represents our understanding of the above pillars respecting Human Rights and encouraging all our internal and external stakeholders – Employees, Suppliers, Vendors, and Service Providers to exceed the requirements of our human rights policy and promote best practices and continuous improvement throughout their operations.

Our Social Accountability & Human Rights related policies are based on a set of HR Management Principles, various Sustainability standards & UN Human Rights (Annexure 3) that are the fundamentals of operational practices to ensure social accountability and responsibility across the value chain. More information is under the link - GFL - Our People HR Principles.



### 2. Support the UN Sustainable Development Goals (SDGs). GFL supports the SDGs and its business actions and community outreach are all aligned to support and contribute to the 17 SDGs.

GFL reaffirms its commitment to assisting in the realization of the SDGs and celebrated Global Day to Act for the SDGs on September 23, 2022, across the Company. Our Labour & Human Resource actions are in support of Human Rights & Sustainable development Goals (SDGs), Please refer to Annexure 2 for the linkage. The Company ran an SDG awareness campaign wherein our employees and the local communities engaged actively. The following approach was adopted for Act4SDGs by carrying out the 3 necessary steps:

#### 1. Communicate

##### Raise Awareness of SDG issues & get informed

We had a virtual inaugural session on SDGs addressed by the Senior Management and Partnership & Membership Engagement Officer of UNGC followed by pamphlet distribution across locations in 3 languages – Hindi, English & Gujarati.



SDG Pamphlet Distribution

#### 2. Advocate

##### Raise your voice and hold Leaders to account

An awareness campaign on SDGs was conducted across locations educating employees on SDGs and our role as an individual and as an organization toward creating a sustainable future by 2030.



SDG Awareness Campaign across locations

#### 3. Activate

##### Organize an event and mobilize your community to take direct action for the Goals

An awareness campaign on SDGs was organized at Government Primary School, Ranjit Nagar, Gujarat to spread awareness among the students and local communities on the 17 SDGs and highlight the progress made in a few areas - water resource management, agro-based livelihood, health care, education, women empowerment, infrastructure, vocational training & skill development, animal husbandry, and wildlife protection.



SDG Awareness Campaign in the Community

### 3. Eensure reporting to stakeholders

The Company has pledged to publish its Social Accountability & Human Rights Report once in two years as part of its commitment to uphold transparency and accountability through precise and timely measurement and reporting. GFL has been reporting progress on social accountability & human rights for the last two years. The last edition was published in 2021 and can be downloaded using the link:

# Our Approach

**GFL conducts its business in a manner that respects the rights and dignity of all people and complies with all applicable laws and regulations.**

The Company is committed to respecting the rights of all workers and communities in all our locations, operating companies, and business operations around the world. We are also committed to treating individuals in all aspects of employment based on ability irrespective of nationality, race, caste, creed, religion, gender, etc. We do not tolerate racial, sexual, or any other kind of discrimination or harassment, or any other human rights issues such as land rights, etc. There is no disparity between the salaries of men and women employees, and we follow the principle of equal pay for equal work.

Our Guideline on Human Rights – HR/63 sets clear expectations for our employees, suppliers, and enterprise partners, establishing a framework that helps us screen compliance with our standards.

With our human rights guidelines in place, we have established a global human rights management approach based on UNGC Principles on Business and Human Rights, we ensure that we gather, store and handle data fairly, and transparently, to prevent, identify, and address potential impacts across our value chain in our operations, supply base, and the Community.



## Operations

All employees shall act lawfully toward other employees, colleagues, business partners, and those in local communities. All new and current employees are required to go through the human rights guideline and awareness training on the Social Accountability & Human Rights of the Company. The Employee Handbook, which is distributed among all employees, also covers aspects of the human rights of the Company. We use reasonable organizational, technical, and administrative measures to protect personal information under our control.



## Supply Base

All our business partners – including suppliers and customers share their commitment to respect human rights. All suppliers must comply with our commitment to human rights, which is outlined in this guideline. Information shall not be collected unless it is for a 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. All business partners are required to undertake the social accountability human rights awareness program.



## Community

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. All communities are given awareness of Social Accountability & Human Rights and their linkage with the Sustainable Development Goals (SDGs).



This approach builds on our focus and prioritization of critical human rights issues – the human rights most at risk through our business activities and business relationships. We closely monitor emerging issues and regularly review our policies, and salient issues to determine whether other human rights have become greater priorities over time and have procedures in place to prevent and address potential human rights risks across our value chain.

# Governance

**To successfully embed respect for human rights throughout our value chain, we believe that robust governance is essential. It is with this objective only that we actively monitor and review our governance structures, practices, and processes from time to time, to ensure the adoption and implementation of best practices.**



The Top Management has constituted an 'Ethics Committee responsible for ensuring the formulation, implementation, and review for maintaining discipline in areas related to Social Accountability, Social Responsibility, Fair Business Practices, Policies, and Guidelines related to Human Rights.

The Social Accountability & Responsibility Corporate Committee (SARCC) is responsible for taking actions related to human rights implementation and works along with the Ethics Committee. The Committee is headed by the Chief Executive Officer (CEO) as the Chairman and the Head – (Group Corporate Human Resources) is the Secretary. The SARCC Steering Committee is constituted to drive, review and provide direction to all aspects of Human Rights, Women Empowerment, Gender equality, WASH, Sustainable Procurement, Responsible Sales & Marketing, Corporate Social Responsibility and other related activities and interventions, across the Company.

We also have a designated Women Empowerment Committee and Internal Complaints Committee which are responsible for investigating, observing, and monitoring human rights issues such as discrimination; harassment, torture, violence, etc across the Organization. Any employee who learns of a potential violation of the human rights guideline is required to report his or her suspicion promptly to the Company Ethics Committee or on [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in).

We have a Responsible Sales & Marketing Committee which ensures the protection of Customer Rights. Additionally, the Sustainable Procurement Committee has been established to ensure the protection of human rights amongst other sustainability parameters in the supply chain. This year, we became signatories to WASH under WBSCD for implementing Water, Sanitation & Hygiene across the Workplace

The above Committees meet at periodic intervals to discuss, monitor, and direct actions in areas of concern related to Social Accountability including Human Rights.



# Materiality & Stakeholder Engagement

We continuously strive to engage with our stakeholders, understand their requirements regularly, seek to, address concerns, and assess issues that impact our operations and our ability to maximize value creation keeping them informed about organizational decisions.

In order with our endeavor to identify issues that are essential to our growth, we conducted a materiality assessment survey in 2021 aimed to recognize topics that play a pivotal role in fulfilling the strategic endeavors of GFL, encompassing the 3Ps – People, Planet and Profit.

## Our Approach

1. Identification of key internal and external stakeholder groups;

2. Review of Indian and global sustainability reporting frameworks, principles, and sectoral issues to arrive at major sustainability topics relevant to GFL (categorized under People, Planet, and Profit);

3. Development of an objective questionnaire designed to uniformly capture stakeholder views to ascertain priority of each topic;

4. Provide access to an online materiality survey to about 230 individual stakeholders;

5. Statistical analysis of survey responses to identify and prioritize material issues.

## Material Matrix



## Identified Material Topics

In total, 17 material topics were identified out of which the highlighted 5 are considered important to businesses and stakeholders with respect to Social Accountability & Human Rights which are as follows:

1. Occupational Health and Safety	2. Employment practices	3. Human rights	4. Talent development and training	5. Employment creation and skill development
6. Emissions, effluents & waste	7. Energy efficiency	8. Water consumption	9. Climate change	10. Opportunities in clean technology
11. Growth and continuity	12. Profitability and Shareholder Value	13. Product development	14. Customer satisfaction	15. Anti-corruption
16. Business risk mitigation	17. Good governance practices			

## Engaging with Stakeholders

Our stakeholder engagement framework ensures that we provide accurate, relevant & timely information and engage with each stakeholder/s.

We participate in CSR activities, community development projects, and viable environmental initiatives through various social platforms to foster effective communication, better engagement, and strengthen the relationship with stakeholders. We have also constituted a Stakeholder Relationship Committee to specifically look into investor complaints and resolve issues faced by our stakeholders.

## Our Principles of stakeholder Engagement

<b>Transparent Information Sharing</b> Provide Balanced and objective Information on time through transparent disclosures	<b>Continuous Consultation</b> Proactively seek views, inputs and feedback and incorporate in decision making and strategy formulation
<b>Proactive Involvement</b> Work directly with stakeholders throughout to ensure that their concerns and perspectives are consistently understood and considered	<b>Positive Collaboration</b> Building sustaining partnerships leading to a greater level of delivery and stakeholder delight

There were nil complaints or grievances during the reporting year in this regard.

GFL engaged in regular and ongoing interactions with various stakeholders including Governments, development agencies, research organizations and communities during the reporting period. Such multi-disciplinary engagement processes stimulate deeper and nuanced understanding of challenges and enable the emergence of customized solutions. Several such stakeholder consultations were held during the year. In addition to the need assessment surveys conducted as part of stakeholder engagement, we followed a holistic development approach that involves an intensive and deep level of engagement, which includes identification and delineation of needs and aspirations of our stakeholder communities in our locations.

Comprehensive stakeholder engagements were undertaken in 2021-22 comprising of 54 Participatory Rural Appraisals (PRAs), covering core villages.

# Training & Communication

The Company offers and has established communication channels and awareness programs for its employees, contractors, Vendors, and other stakeholders to educate and inform them about its human rights policy framework.

- All business contracts have an exclusive clause on the business aspect of human rights. The Employee Handbook, which is distributed among all employees, also covers aspects of the human rights of the Company.
- A declaration for acceptance and adherence to the policies related to Social Accountability & Social Responsibility is part of the joining process. All our employees have given this declaration.
- We strive to prevent human rights abuse across our supply chain. Awareness programs on social accountability, human rights issues such as forced labor, discrimination, and campaigns on human rights laws and policies are conducted regularly for our employees, contractors/sub-contractors, and business service providers followed by the pamphlet distribution. Not only the employees but also contract laborers have been taken through the human rights awareness program. We ensure that there is no human rights abuse in our entire supply chain.
- All the employees are required to compulsorily undertake online Social Accountability & Human Rights training course available on our Learning Management System.

This year, we conducted Human Rights Awareness Campaign for over a month across locations with an aim to spread awareness of the 30 UN human rights amongst our internal stakeholders, and the mechanisms available in the company to report in case of violation of these rights.

During FY 2021-22, there were no complaints, legal cases, rulings, or fines against the company regarding human rights violations, sexual harassment, and discrimination in employment reported from any site of the Company.



Human Rights Awareness Campaign across locations

# Conducting Human Rights Impact Assessment & Due Diligence

Being a signatory to UN Global Compact and adhering to 10 principles and adopting the 'Protect, Respect and Remedy' Framework demonstrates that the company supports and respects human rights and that such systems are implemented globally.



We are SA8000 certified and have adopted and aligned our processes to ISO26000 (Social Responsibility) and ISO20400 (Sustainable Procurement standards) across our supply chain.

We continue to look for ways to improve how we review risk to make sure we can identify any trends, hot spots, and root causes and remediate issues effectively. As part of its human rights due diligence strategy, the Company identifies and addresses areas with a serious adverse impact on human rights and conducts impact analyses in these areas. In order to proactively identify and prevent possible negative human rights consequences in its operations and value chain, GFL is dedicated to doing everything that is reasonable and practical. Different due diligence techniques support this.

The company assesses internal and external assessment mechanisms, such as self-assessment questionnaires, announced and unannounced on-site audits of its independent Suppliers, Vendors and Service Providers, Vendors and Service Providers audits, Employees and workplace wellness surveys, to ensure compliance with the human rights policy. These audits may include employee interviews and third-party inspections - Suppliers, Vendors, Service Providers, Facilities, operations, books, records, and supplier-provided housing. Corrective measures must be implemented if violations are discovered.

Employees and suppliers are expected to comply with all applicable company policies. Violation of our human rights policy or the refusal to cooperate will result in disciplinary action, up to and including termination or termination of the contract.

The following series of steps are followed while carrying out the due diligence:

**Step 1** - Gaining a thorough grasp of the business and human rights context requires recognizing the limits and engaging with stakeholders. We examine our current policies, practices, and operations to see how each business/function might affect human rights.

The SA8000 Surveillance Audit for the Company's manufacturing operations in Dahej and Ranjit Nagar was completed this year. In accordance with our code of ethics, we completed our second ISO37001 (Anti Bribery Management System) surveillance, with our scope expanded to include international locations. This itself confirms our commitment to upholding the highest ethical, social, and business development standards. The ISO26000 and ISO20400 recertification is completed with the scope expanded to international locations.

Furthermore, DQS India conducted our second Human Rights Compliance Assessment across locations to review our implemented processes and take necessary corrective actions for continuous improvement. The methodology used for the assessment included both structured and unstructured interviews with key employees, local communities, contractors, and suppliers from various locations. The HRCA covered the 7 locations - Noida, Dahej, Jolva, Ranjitnagar, Vadodara, Germany, and USA covering the human rights impacts across 3 areas:



# Conducting Human Rights Impact Assessment & Due Diligence

**Step 2** - The second step is to evaluate our score and identify the most important Salient Human Rights issues for the company so that we can narrow the long list of human rights issues to those that the company can impact and identify hotspots. Our overall Human Rights Impact Assessment score summary for the period (April 2021 – Nov 2022) is provided below:

Social Accountability & Human Rights Parameters	Location	Score obtained	Maximum score	% Score
	Dahej A	337	350	96%
	Dahej B	318	350	91%
	Ranjitnagar	313	340	92%

The following table illustrates the few important identified areas of improvement through the assessments of our manufacturing sites and offices:

Sr No	Area	Identified Issues
1	Contract Labour Management	1. Ensure the requirement of issuing appointment letters; transparency in the wage structure, hours of work, overtime management & PPE Issuance
2	Health & Safety	1. Industrial Hygiene Survey to be conducted by Professional bodies 2. Improve the effective on-site visible presence of line management to demonstrate commitment to safety to workers 3. Explore having a separate Permit To Work system 4. PPE Management policy to be clear and transparent to spell out that providing PPE is an employer's responsibility
3	Management System	1. Integrate the requirement of the Human Rights Protection Act, 1993 in the HR's legal register, monitoring matrix, and periodic legal compliance evaluation. 2. Focussed Human Rights Risk Assessment exercise to be undertaken as part of an Enterprise-wide Risk Management program to know the focus areas 3. Integrate EHS issues in the buying process 4. Define organizational standpoint in the human rights policy while collaborating with external stakeholders regarding due diligence wrt human rights 5. Establish an Internal Audit system for ensuring human rights implementation. 6. Organize IT training on ensuring data privacy for employees 7. Undertake an integration process for GOI National Action Plan on Human Rights prepared by the Ministry of Corporate Affairs



# Supply Chain & Our Operations

**GFL is dedicated to the principles of “We Source Responsibly” and works hard to choose reputable Business Partners/Suppliers, Vendors, and Service Providers who are Dedicated to Ethical Standards and Business Practices Compliant with GFL. For the purpose of implementing Sustainable Procurement Management Systems throughout the Company Supply Chain, GFL is aligned with and has adopted ISO 20400 standards.**

We anticipate that all of our suppliers, vendors, and service providers will uphold the values outlined in the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

We have an established policy in place on Sustainable Procurement and a Code of Conduct. Our Procurement Practices are governed by the above policy. Our policy is available on the GFL website at <https://gfl.co.in/Sustainability.php> We expect our Suppliers, Vendors, and Service Providers/Suppliers to set in place internal policies, governance structures, systems, and processes and take any other relevant measures to ensure adherence to this Policy.

The Company is committed to ensuring that Conflict minerals contained in our products are sourced with due respect to human rights. GFL conducts its worldwide business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. Suppliers, Vendors and Service Providers are expected not to source conflict minerals. The Company has a policy in place on the Procurement of Conflict Minerals in this regard. We have a process of explaining the policy to suppliers, vendors, and service providers and submitting the adherence declaration. Additionally, GFL extends support to its vendors by hosting numerous webinars to raise knowledge of sustainable procurement.

The Management demonstrates its commitment to sustainable leadership by remaining accountable for the effectiveness of the sustainable procurement process and reviewing company objectives and functional objectives. For this, the Top Management has constituted the ‘Sustainable Procurement Committee’ which is held accountable and responsible for providing strategic direction for taking required actions for the implementation of Policies, Processes & Practices on Sustainable Procurement.

The Company uses a digitalized tool Supplier Audit Management Tool by DQS Services to evaluate existing Suppliers, Vendors, and Service Providers and to award contracts to new Suppliers, Vendors, and Service Providers. Any new supplier must complete this online questionnaire before being evaluated on the basis of social and sustainability, as well as social accountability criteria. The decision to continue or start doing business with the supplier is taken considering the score and other factors into account. GFL shall work with our Suppliers, Vendors, and Service Providers to identify issues that do not meet our expectations and help them in addressing the gaps identified if any.

Our Sustainability goals are interwoven with the way we do business all along our value chain. The company is a signatory to the United Nations Global Compact (UNGC), Science Based Targets Initiative (SBTi), and is a member of the Indian Chemical Council (ICC). This year, we came out with our first-ever, Sustainable Procurement Document Report 2021-22. For more information on Sustainable Procurement, please refer to our Sustainable Procurement Document Report 2020-21, which can be downloaded from the link below - <https://gfl.co.in/upload/pages/1ef5040ecddb106e095d2d62ded9d4c7.pdf>



# Responsible Sales & Marketing & Human Rights

**Our Responsible Sales and Marketing (RSM) policy explains the guiding ideals that guide the work of our business and marketing teams. In order to respect human rights, it is our company policy to adhere to all applicable privacy and data protection regulations ensuring the protection of human rights.**

To verify compliance with the policy, ensure its effectiveness, and provide chances for pertinent modifications in response to changes in the business environment, regular training and discussions are held. Our business teams are required to sign a statement stating that they agree with the policy and uphold ethical business conduct in both theory and practice.

For detail on our Responsible Sales and Marketing policy please visit: <https://www.gfl.co.in/upload/pages/ece3ebcdfcafe4bfe8e3086191c37f63.pdf>

Responsible Sales and Marketing at GFL are driven by a corporate-level committee that comprises representation from each business unit and other pertinent functions. The committee collaborates on the activation of resources and conducting ground-level work at each location. The committee is responsible for providing strategic direction for taking required actions for the implementation of Policies, Processes & Practices & monitoring progress with responsible entities on Responsible Sales & Marketing.

For us, Responsible Sales & Marketing (RSM) means how we are perceived as a company by our customers, competitors, and employees when it comes to fair business practices. With this conviction, we have defined the roadmap to identify areas of improvement and delineate the future of RSM at GFL for years to come.

As a global player in the domain of Fluoropolymers and one of the prominent Chemicals Companies in India, GFL realizes its increased accountability towards collaborative action on Environment, Health & Safety, and ethical business operations. With this conviction, we published our first Responsible Sales and Marketing (RSM) Report (2021-22) emphasizing our commitment towards fair & ethical business operations across our establishments.

We are now certified in compliance with Anti-competitive & Anti-trust principles based on the Competition Act 2012 (CCI- Ministry of Corporate Affairs – GOI), ISO 26000, and UNGC Principles (Anti-competitive & Anti-trust principles). Also, our business teams are trained to understand and follow these laws as per company policy. We also conduct regular internal audits across offices and product lines to ensure that our sales and marketing processes are in line with the Anti-trust & Anti-competitive laws of the countries in which our businesses operate.

## Human Rights & Community Development

We endeavor to ensure the social and economic development of the communities in which we operate. Our Corporate Social Responsibility focus areas revolve around the SDGs and ensure the protection and advancement of Human Rights. For details, please refer to page number: 83-87 of our Annual Report, available on our website at the link below:

<https://gfl.co.in/upload/pages/591aac25d2118d9b5d9a10b48a685415.pdf>



Entrepreneurship development training Programme by IEDI



Distribution of Daily Coupon Support for Animal Treatment



Ranjitnagar Handicraft Centre



Health Awareness Programme IN nearby villages



# Salient Human Rights Issues, Taking Action & Results

**GFL strives to look for ways to understand potential and actual human rights impacts across its operations and value chain and to improve how we review risk to make sure we can identify any trends, hot spots, and root causes and remediate issues effectively.**

As part of its human rights due diligence strategy, the Company has enlisted expert assistance to review our implemented processes and identify and address areas with a serious impact on human rights and identify necessary corrective actions in identified areas for continuous improvement. This process has assisted the company in better understanding its impact and the need for additional mitigating and remediating measures.

The topics listed below represent the current focus areas in no specific order. It is not an exhaustive list of all human rights issues addressed by the company. It emphasizes specific policies and programs that are in place and are also supported by the GFL HR Business Principles.

## 1. No Discrimination & Diversity

GFL believes that regardless of any form of discrimination, everyone has the right to the same basic human rights as their birthright. The Company and its affiliates are dedicated to the equal employment policy. This commitment is a crucial component of the company's mission to become an "Employer of Choice." As a result, all our HR policies and practices reflect non-discriminatory practices and offer all employees the same opportunities.

We do not discriminate on the basis of race, color, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, indigenous peoples affiliation, trade union affiliation, political affiliation, or political or another opinion. Marital or family status, personal relationships, and health status, such as HIV/AIDS status, are all emerging prohibited grounds. As part of this commitment, all employees at all levels are expected to treat their co-workers fairly, with respect, and without harassment. All stakeholders have equal access to employment opportunities. This includes recruitment, selection, and appointment, as well as training, learning and development, promotion, Company activities, and other employment terms and conditions. All personnel is treated with dignity and respect.

GFL focuses on attracting, developing, and, retaining the right talent across its business verticals. The Company diligently promotes diversity and inclusion, human rights, continuous learning and development for skill-up-gradation, and employee engagement to make a value-based culture where employees excel along with business growth.

### Total Number of Employees (Domestic)

Year	2021-2022	2020-2021	2019-2020
Total	2830	2220	2216

### Annual Employee Turnover %

Year	2021-2022	2020-2021	2019-2020
Overall Turnover Rate (%)	18%	12%	20%

We are committed to providing equal employment opportunities without any discrimination to all stakeholders and comply with prevailing labor laws and ILO Conventions in all areas of recruitment, selection, appointment, training, learning and development, promotion, Company activities, and other terms and conditions of employment. We however give preference to the sons of the soil and extend preference to the local population by hiring employees from the communities surrounding our manufacturing unit.

The Company has a strong talent acquisition framework in place for hiring energetic, ethical, and, talented young minds. The talent hunt footprint is wide across India's top institutes and B-schools. Through our wide-ranging systematic training program, the new talent is empowered to take the organization to a new level of growth.

GFL continuously engages with reputed institutes to build long-term relationships with the academia and to ensure young talent is inducted directly from these campuses.

The company's recruitment policy is based on fairness and non-discrimination, as well as compliance with labor laws. The business upholds the ILO convention's 1958 mandate to end "discrimination in regard to employment and occupation." There are established guidelines in this regard. All the guidelines are included in an employee handbook. Presently, joining requires a declaration of acceptance and adherence to the guidelines. The guidelines are based on the ILO Conventions listed below:

Sr No	Convention/ Recommendation No.	Issue Addressed
1	ILO Convention 100 and 111	Equal Remuneration and Discrimination-Employment and Occupation
2	ILO Convention 131	Minimum Wage Fixing
3	The United Nations Convention to Eliminate All Forms of Discrimination Against Women.	
4	The United Nations Convention on the Elimination of All forms of Racial Discrimination	

In line with the Equal Remuneration Act of 1976, the company is an equal opportunity employer with no sexual discrimination based solely on the category of work performed.

All employees are evaluated for their performance over the course of six months before being confirmed. All of our employees' performance is evaluated using the normal distribution and relative evaluation concepts. Our Performance Management System supports the right to fair treatment, objectivity, transparency, and non-discrimination. Thus, ensuring a performance-driven culture.

### Number of Employees Promoted/Upgraded

2021-2022	2020-2021	2019-2020
667	660	-

\*On account of COVID-19, promotions for FY 2019-20 did not happen

Women Empowerment & Diversity is an integral part of its people strategy at GFL. As a signatory to UN Women and UNGC Women's Empowerment Principles, the Company has demonstrated its commitment to Gender Equality and Women Empowerment.

The women population in our Company has been steadily increasing and we are proud to now have young lady engineers in our workforce. We are an equal-opportunity employer and plan to improve the gender ratio in leadership positions and the inclusion of women employees in all functional roles. Besides equal employment, all employees have equal access to relevant training and skill enhancement programs.

### Number of Women Employees

FY 22	FY 21	FY 20
67	51	47



International Women's Day – Break the Bias Campaign

### PMS Coverage – Level wise

Percentage by gender and by employee category who received a regular performance and career development review during the reporting period					Percentage by gender and by employee category who received a regular performance and career development review during the reporting period					Percentage by gender and by employee category who received a regular performance and career development review during the reporting period				
FY2021-22					FY2020-21					FY2019-20				
Employee Category		Male (%)	Female (%)	Total (%)	Employee Category		Male (%)	Female (%)	Total (%)	Employee Category		Male (%)	Female (%)	Total (%)
Permanent	L2	78	0	78	Permanent	L2	92.59	..	93	Permanent	L2	62	..	62
	L3	86	1	87		L3	96.47	100	96		L3	83.	..	83
	L4	87	6	92		L4	94	100	94		L4	95	75	94
	L5	83	4	86		L5	87.44	78.7	87		L5	97	83.3	96
	L5S	62	0	62										
	L6	99	0	99		L6	94.09	..	94		L6	100	..	100

\*The employees who have joined on or before 30th September are eligible to be covered under the PMS for the financial year.

# Salient Human Rights Issues, Taking Action & Results

We support and create awareness about employing differently-abled people. During this Financial Year, The total number of permanent employees with a disability as of 31st March 2022 was 11.

The Company hires, trains, promotes, and rewards employees solely on the basis of their performance, according to our HR Operations Manual and Employee Handbook. All employees (including new joiners) are taken through an awareness program on the protection of human rights and the employee handbook also covers aspects of the human rights policy of the company which has been distributed to all the employees. Not only company employees but also contract labors have been taken through the human rights awareness program.

Location	Total number of hours spent on training on Human Rights 2021-2022	Total number of hours spent on training on Human Rights April 22 to Nov 22	% Employees covered on training on Human Rights 2021-2022
Dahej A	1914	680	83%
Jolva (Dahej B)	104	246	76%
Ranjitnagar	1914	688	75%
Noida & Other offices	324	212	91%
International Locations	18	18	100%

Additionally, special training on human rights policies, procedures, and their application in security practices is organized for security personnel across locations.

## Security Data Personnel Training on Human Rights

2021-22					2020-21				
Location	Number of Security Personnel			Total Training Compliance %	Location	Number of Security Personnel			Total Training Compliance %
	Own	Contractual	Total			Own	Contractual	Total	
Noida	0	10	10	79%	Noida	0	9	9	100%
Dahej	1	64	65	65%	Dahej	1	64	65	71%
Ranjitnagar	1	43	44	78%	Ranjitnagar	1	42	43	98%

Each location has an internal complaints committee to handle accusations related to sexual harassment, and the company has a Protection & Compliance framework in place. All employees receive comprehensive training on how to curb inappropriate behavior and uphold individual dignity.

During FY 2021-22, no complaint was received from any stakeholder regarding a human rights violation - employment discrimination reported from any of the Company's sites.

## 2. No Child Labour

We are committed to preventing the use of child labor within the organization, as per local laws related to the minimum age of work. The 'no child labor' policy at GFL reiterates our commitment to ILO convention no. 182 and the United Nations Convention on the Rights of the Child. As part of our recruitment process, all prospective employees have to submit their age verification documents along with their job applications. All applicants below the age of 18 are summarily rejected.

We apply the same policy for contract labors as well and do not employ people below the age of 18 years. We also make sure that our suppliers and service providers are abiding by the clauses pertaining to the prevention of child labor and a specific clause is mentioned in the service contracts/ purchase orders to adhere to the same.

None of our operations and suppliers pose the risk of child labor or exposure of young employees to hazardous working conditions.

## 3. No Forced/Compulsory/Bonded Labour, Slavery & Harassment

The Company values labor dignity and does not tolerate forced/bonded/compulsory labor, including prison or debt bondage labor. Our policies and guidelines protect the right to life and provide our employees and contract workers with the freedom from torture and inhuman or degrading treatment. The company does not use forced or compulsory labor, such as prison or debt bondage labor.

The company has rolled out policies in this regard. The policies are a part of the HR Operations Manual and Employee Handbook and are in reiteration of the company's commitment to the ILO convention: 29 and 105 - Forced Labour and Abolition of Forced labor.

We have eight-hour shifts and a six-day work schedule, following mandatory provisions of the Factories Act, 1948 to ensure an optimum number of working hours in a day, a weekly day off, extra wages for overtime, and provision for leave. We strictly follow the Payment of Minimum Wages Act, 1948.

The joining process includes a declaration of acceptance and adherence to the policy. We are a free-will company, and employees may leave at any time after serving the required notice period stipulated in their terms of appointment. All employees receive continuous training and awareness programs on the Prevention of Sexual Harassment (POSH) in the workplace. Not only company employees but also contract labors have been taken through the POSH awareness program.

Location	Total number of hours spent on training on POSH 2021-2022	Total number of hours spent on training on POSH April 22 to Nov 22	% Employees covered on training on POSH 2021-2022
Dahej A	1921	708	84%
Jolva (Dahej B)	96	274	79%
Ranjitnagar	1921	422	84%
Noida & Other offices	288	194	86%

There is no significant risk of forced/compulsory labour, slavery, or harassment-related issues in any of our operations and suppliers. The company has an established Protection & Compliance framework as well as an Ethics Committee in place that allows employees to raise any issue related to forced/compulsory labour, anti-slavery, and human trafficking violations. It also reiterates the company's no-retaliation policy.

During FY 2021 - 22, there was no complaint received from any stakeholder/s regarding human rights violations, forced/compulsory/bonded labor, Slavery, and Sexual Harassment in employment reported from any site of the Company.



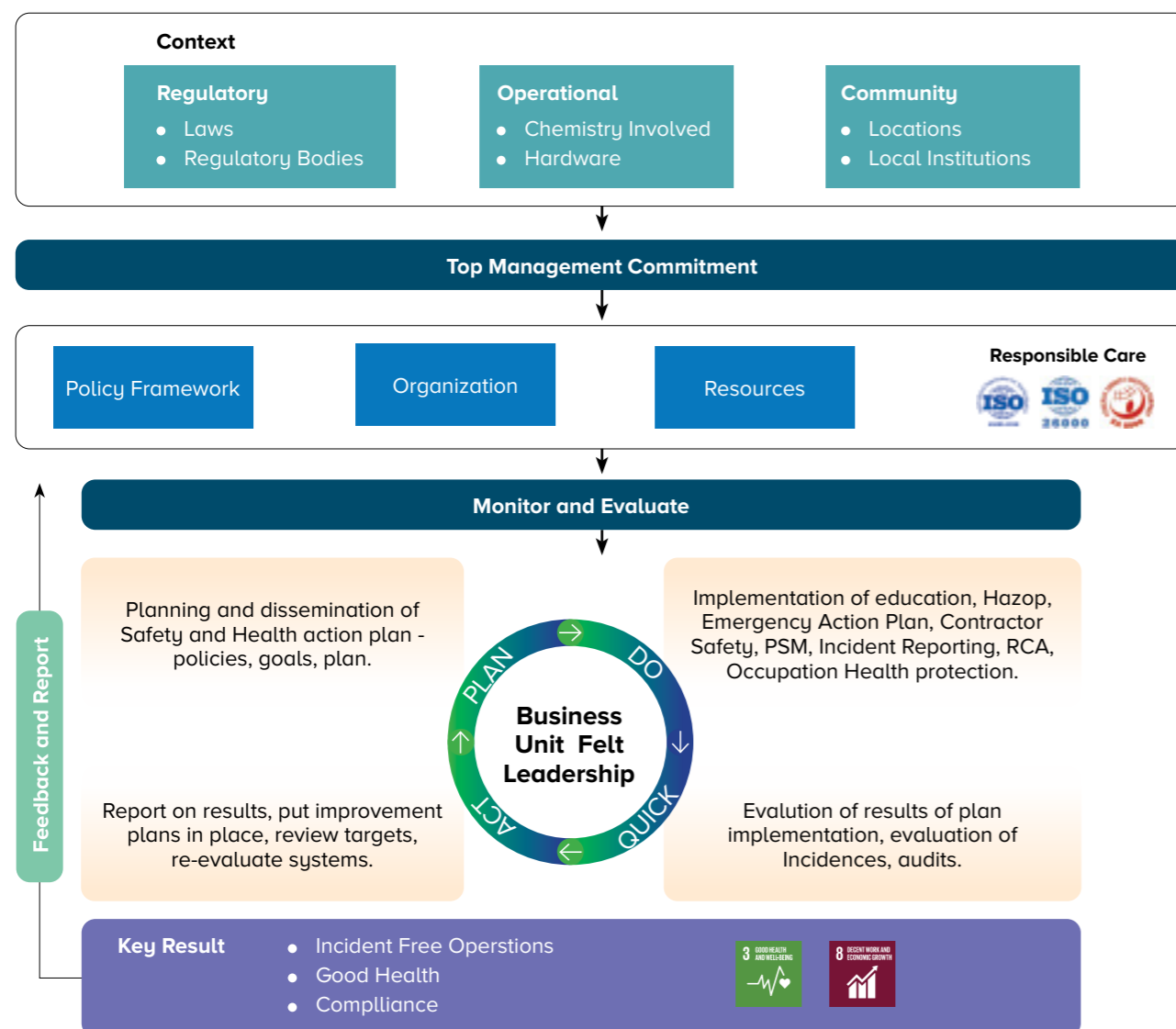
# Salient Human Rights Issues, Taking Action & Results

## 4. Health & Safety

For GFL 'Safety is A Value-Not just A Priority' is reflected in all our endeavors. The Company is committed to ensuring the health and safety of its employees, contractors, customers, and the public while meeting its business needs. GFL is certified under OHSAS 18001:2007, ISO9001:2015, ISO 14001:2015, and ISO45001. In accordance with its provisions, the Company ensures adherence to the standards and regulatory norms, thereby providing a safe and healthy working environment.

At GFL, ensuring the health, safety, and welfare of our workmen, contractual partners, and other stakeholders, including local communities, has been the core of our business operations. We have taken active measures across our facilities to ensure the safety of all our employees and workmen. By leveraging our responsible care management system. We are committed to excellence and continuously improving on health, safety, security, and environmental performance of our company. GFL's commitment to responsible care is part of its sustainability initiative to positively impact the 3Ps: people, planet, and profit. The OH&S framework is implemented through a well-structured governance structure, which ensures the linkage of the top management with our shop floor.

### OH&S framework and governance structure



We have a long-term contract with Dupont Sustainable Solutions ('DSS') to support us in our journey toward safety excellence. The top leadership takes an active interest in driving Safety, Health, and Environment (SHE) through continuous review, resource allocation, and driving different elements of process safety management. Suraksha Setu is the banner under which all our safety initiatives are dovetailed into.



As a Company, we believe that safety can be ensured when people at the grassroots work safely. The 'I Am A Safety Leader' campaign has been rolled out to inculcate safety behaviour, especially at the grassroots at work, at home, and while traveling. This programme is structured based on the 4E Framework and implemented through the 5 Essential Steps.



### 5 Essentials Steps for Safety



### 4E Framework for Safety



To develop awareness and encourage safety among employees. We provided OH&S training on a regular basis. We have unit level APEX committee, chaired by UH (Occupier) and various safety committees update the status of the KPI on improvements in the Unit. We also conduct mock drills and table-top exercises during the day and off-working hours. A full-fledged mock drill is conducted on a quarterly basis.



National Safety Day at Ranjitnagar

Employee Wellness is of crucial importance at GFL. The Company is committed to employee well-being and the health and safety at our Workplace are governed by policy, principles & processes. To build awareness and encourage workmen to take initiative in all areas of OH&S, various celebrations such as Safety Day/ Week, Environment Day, and Ozone Day, International Family Day are organized at the sites and offices.



Home Safety Booklet Distribution

# Salient Human Rights Issues, Taking Action & Results

Our commitment to a clean and healthy workplace has been reiterated with the signing of the WASH pledge this World Water Day. To inspire action to tackle the global sanitation crisis and help achieve Sustainable Development Goal 6 (SDG 6), which promises sanitation for all by 2030, we conducted WASH Awareness Campaign on World Toilet Day, 19th November, across the Company. The purpose of the campaign was to create awareness amongst the employees/contractors on the concept of WASH, how the workplace is benefited by implementing WASH, and its linkage to SDGs. It was followed by the pamphlet distribution.



WASH Awareness Campaign

Furthermore, a Workplace Wellness Survey was conducted across locations last year covering 70% of the total population. Based on the result, more than 20 wellness programs - Every Sunday is a Yoga day, Iron & calcium deficiency camp for Women, BMI check-ups for male employees, and, Eye camps are a few such programs organized across locations during the year. As a step to integrate Senior employees for a better quality of life, the company extends free annual health check-up for self and spouse.

We believe our workmen are important stakeholders in our business ecosystem. Like our employees, all contractual labors/workers are provided induction training and certified by the OH&S department of the plant before they start working. We ensure that our workmen are provided safe, suitable, and sanitary work facilities and provide them with the protective equipment and training necessary to perform the tasks safely. We have induction training programs for each of the contract workmen and medical health check-ups prior to outputting plant activities, a training card is issued. Our workmen are part of the unit Safety Committee, minutes of the meeting are circulated to them and their views are very much valued during such committee meetings. We also update them on the status of their concerns. We distribute booklets as required by 68-J and other

safety-related training programs on imminent hazards on a regular basis

Various initiatives have been taken to promote the health of our workmen and contractors. Some of them comprise:

- Pre & periodical medical check-ups of own and contract employees
- Organising dental and health check-up camps
- Blood donation camps
- First Aid training programs
- Training are conducted as per the unit Training Plan and we appreciate the participation through refreshments, quiz contests

Job safety analysis (JSA) & Hazard Identification and Risk Assessment (HIRA) are used on a routine basis for hazard identification and Permit To Work (PTW) with Pre-JSA used with the PTW system with various authorities. We use Why-Why (till 5) for incident investigation and root cause analysis which is integrated into our digital platform 'Suraksha Setu'. We also carry out HAZOP for all our operational activities with an established system of Management of Change (MoC) and pre-start-up safety review (PSSR) for safety. We also have an emergency preparedness plan in place for potential disasters and risks.



Chair Yoga session at Ranjitnagar



Yoga Session at Dahej

## 5. Working Hours & Leisure

As per UDHR, everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay. At GFL, we encourage timeliness and discipline in the regularity of attendance while also facilitating a better work-life balance for employees. Flexi-timing and an alternate Saturday extended weekend are two things that GFL offers its employees who work in offices. We also provide 9 festival holidays to the employees to participate in their religious activities. Recently, we introduced the following leaves for our employees:

S.No	Leave	Details
1	Time Off	An employee can avail short leave twice a month for 2.5 hrs a day – pre/post lunch
2	Celebration Leave	An employee can avail 1 celebration leave in a year on his/her/spouse/Parent's birthday/anniversary as chosen by the employee
3	Bereavement Leave	An employee can avail 3 bereavement leaves in the unfortunate event of demise of the employee's immediate family member.

Under special circumstances, such as personal illness, illness of a spouse, child, or other members of the family, natural disaster, educational purposes, and during transfers to other areas, we also permit employees to take additional leave and offer work-from-home facilities. Furthermore, the Maternity Benefit Act grants all women employees the right to avail childcare leave. The company has established policies in this regard.

The working hours, rest periods, shift rosters, spread overs, compensatory day-offs, and weekly day-offs are governed by the terms of the Factories Act, 1948. Overtime is paid as per the Factories Act, 1948. Overtime wages are calculated at double the gross salary. All technicians and trainee technicians in the technician grade/level, as applicable in the respective Plant/Sites are covered in this policy.

All such service conditions are made applicable to all contractors' labors/workers. Plants adhere to national laws in their respective countries regarding work hours, rest breaks, and so on. It ensures the right to do one's duty and the right to the surrounding world.

### Details of Parental Leave

S.No	Parameter	2021-22		
		Male	Female	Total
1	Total number of employees who were entitled to parental leave (in numbers)	22	4	26
2	Total number of employees who took parental leave (in numbers)	22	4	26
3	Total number of employees that returned to work in the reporting period after parental leave ended (in numbers)	22	3	25
4	Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work (in numbers)	22	3	25
5	Return to work and retention rates of employees that took parental leave (in %)	100	67	83



# Salient Human Rights Issues, Taking Action & Results

## 6. Remuneration

The company offers competitive pay to its employees and has adjusted the pay structure to follow the principle of “Equal pay for equal labour.” Individual pay levels at GFL not only reflect employee contribution but there is no pay disparity between men and women.

The company's Nomination & Remuneration Policy (NRP) continues to be the guiding light for maintaining remuneration standards in accordance with the provisions of Section 178 of the Companies Act, 2013, and Listing Agreement. The policy is available on the Company's website at the below link: [https://gfl.co.in/assets/pdf/GFL\\_nomination\\_and\\_remuneration\\_policy\\_130820191.pdf](https://gfl.co.in/assets/pdf/GFL_nomination_and_remuneration_policy_130820191.pdf)

The company follows the provisions of the Equal Remuneration Act, 1976, and conducts salary and wage surveys through remuneration consultants and specialists to determine standard salary levels in other companies engaged in similar businesses to ensure parity and non-discrimination of salary and wages

within the organization and within the industry cum region. The company also complies with local income withholding requirements, such as taxes, social security, and housing funds.

Our Remuneration Policy, Social Security Schemes, and Welfare Measures process ensures the protection of Human Rights as enumerated in the UN Declaration of Human Rights and the UNGC principles. All labors/ contract workers working at our premises are given bonuses and benefits of social security schemes.



### Coverage of Group Medical Insurance and Group Personal Accident Insurance/ Social Security Schemes, Bonus and Ex-gratia schemes

Sr. No	Benefit	Coverage	FY 22			FY 21			FY 20		
			Total Number of Employees	Employee Covered	% Coverage	Total Number of Employees	Employee Covered	% Coverage	Total Number of Employees	Employee Covered	% Coverage
1	Group Medical Reimbursement Scheme	Employee, spouse, two Dependent children	2486	2486	100	2220	2165	100	2216	2154	100
2	Group Personal Accident Insurance	Accidental Death irrespective of location of employee	2616	2616	100	2220	2220	100	2216	2216	100

## 7. Indigenous People & Land Rights

We believe that indigenous peoples' rights should be protected and that indigenous cultures, customs, and institutions should be encouraged to thrive. By hiring employees at the General Manager level and above from the communities surrounding our manufacturing units, we give preference to the local population.

Location	Local Community	Total Percentage of Employees – GM and Above	Total Percentage of Employees – GM and Above	Total Percentage of Employees – GM and Above
		FY 22	FY 21	FY 20
Noida	Noida, Ghaziabad, Delhi, Faridabad, Gurgaon	53%	35%	62%
Dahej	Bharuch, Vadodara, Surat, Narmada, Vapi,	32%	19%	55%
Ranjitnagar	Vadodara, Mahisagar, Chhota Udaipur	62%	31%	89%
Vadodara	Anand, Panchmahal, Bharuch,	70%	15%	100%

We believe that the rights of indigenous people should be protected, and indigenous cultures, customs, and institutions should be encouraged to flourish.

As part of our commitment to protecting indigenous culture, we actively participate in Panch Mahotsav celebration which celebrates the exquisite beauty and magnificence of the heritage, architecture, and culture of Champaner and Pavagadh in Gujarat. We also organize resting centres, with an adequate supply of food and drinking water, for devotees who travel on foot to visit Mahakali Pavagadh during Chaitri Navratri, a local festival.

We make certain that our operations do not occupy indigenous people's territory or cause any damage to their property. In the event of any expansion or land acquisition, we obtain indigenous people's consent through public hearings and address their concerns.

There have been no incidences of a violation involving the right of indigenous people during the reporting period.

2021-22		
Location	Employment	% of total manpower
Ranjitnagar	On roll + Contract Labour	37
Dahej A		25
Dahej B		12

## 8. Standard Of Living & Fair Wages

At GFL, the remuneration structure is based on the living wage concept, which guarantees wages sufficient to provide a decent standard of living for the employee and her or his family. Provisions for adequate food, water, housing, education, healthcare, transportation, clothing, and other essential requirements, including provision for unexpected events, are factors determining a decent standard of living. As a result, GFL pays more than the statutory minimum wage in all of its locations, even at the entry-level.

We have established guideline/s with a structured process of Wage and Salary determination & Annual increments ensuring that employees are paid in a logical, equitable, and fair manner. The Company pays competitive wages and salaries that are motivational, fair, and equitable, variable with individual and Company performance, and in compliance with all applicable statutory requirements.

Year	2021-22	2020-21	2019-20
Average Raise %	8.7	10	Nil

\*On account of COVID-19, promotions for FY 2019-20 did not happen.

Unless permitted by national law or a collective bargaining agreement, the Company/supplier does not withhold or deduct wages for disciplinary reasons. In addition, the company/supplier reimburses employees for overtime at a premium rate set by national law or collective bargaining agreement.

# Salient Human Rights Issues, Taking Action & Results

## 9. Disciplinary Practices

The Company has developed a Code of Conduct (CoC) to ensure that the Company's operations are conducted in accordance with the highest ethical and value standards, while also complying with all applicable laws and regulations. The CoC encourages all Directors and Officers of the Company to act with the utmost personal and professional integrity, honesty, and ethical conduct while working at the Company's premises, offsite locations, at the Company's sponsored business and social events, and/or in any other place where they represent the Company. Our disciplinary procedure is founded on the 'Principles of Natural Justice,' and it is free of bias and discrimination.

The Company also has a Whistleblower policy which is a mechanism to reinforce the implementation of the Company's CoC which encourages each and every Director and Officer of the Company to take positive actions which not only commensurate with the Company's belief but are also perceived to be so. The company has established policies in this regard.

All Employees worldwide working with the company are expected to sign an undertaking to comply with all applicable laws, regulations, codes, and sanctions relating to the code of conduct and all applicable company policies. The signing of the undertaking is a part of the joining process of all new employees with immediate effect.

The company has also adopted a Statement of Fair Business Practices and Responsible Care Marketing & Sales. Our processes comply with ISO37001 standards and the company conducts surveillance audits periodically.

Our policies against bribery, corruption, and unfair business practices are also communicated within the organization via banners, posters, and flyers. 100% of governance body members, employees, business partners, and other stakeholders communicated and trained on the anti-corruption policy adopted by us.

Our employees are provided platforms to raise alarms about breach of Fair Business Practices Policy. We encourage employees to identify and report instances of corruption, bribery, fraud, etc. as part of the 'Spot on – Value Champion' spontaneous recognition process. Employees can report violations or concerns through a digital platform, 'Ethics Line'. Concerns are reported only to the Ethics Officer to maintain strict confidentiality. It is the duty of the Ethics Officer to investigate and report back to the whistle-blower. Furthermore, employees, as well as other stakeholders, can write to [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in) to report any incident anonymously.

We prohibit retaliation in any form, against anyone who raises a business conduct concern in good faith, even if it is found to have no merit during the internal investigation. All employees also have the right to refuse an instruction or direction given by a superior, if it violates the Human Rights & Fair Business Practice Policies. We have embedded the principle of ethics and integrity across the organization through continuous communication of fair business practices, procedures, and policies, regular training and education of employees, strong vigil, and systems implementation.

During FY21-22, we received Five complaints from our stakeholders, related to the Code of Conduct, Whistleblower & Equal Employment Opportunity, and the complaints were resolved by the end of the year. All the complaints were investigated by an independent team and resolved. In most cases, the complaints were unfounded and a response was given to the complainant to their satisfaction.



## 10. Talent Development & Training

GFL has a well-defined process for the Career Progression/Development of its employees. The process is solely focused on the merit of the applicants. Talent Development across GFL is monitored by the Unit and Corporate level Talent Review Committees.

Our Unit & Corporate level Talent Review Committees monitor the Talent Development process across our Company. For fair identification and specific development plans, we adopt various development tools – Identifying High Potentials through 9 Box Matrix, 360-degree Feedback, Assessment Development Centre, and Individual Development Plan. All the identified A player's employees are taken through the one-year high-potential program for Leadership Development conducted by a reputed external organization. More than 80% of employees serving as General Managers and above levels have been covered in the 360-degree feedback.

Number of High Potentials identified across the company	FY2021-22
Average Raise %	77

A few of the high potentials have also been sponsored by our company for the Executive Development Program through IIM. High Skilled Technicians who are consistently high performers are taken through a higher education scheme for career progression.

Great organizations focus on achieving sustained superior performance while supporting an engaging

culture where highly capable people feel engaged and valued. With this in mind, we have identified and designed two flagship programs covering all employees of level AGM & Above which will speak and inculcate the leadership virtual that is expected from leaders by the organization. We have partnered with an external agency to support us in the transition. We are glad to announce that one such program on The Four Disciplines of Execution (4DX) has already been conducted for first Batch at Vadodara.

Employee growth is inextricably linked to the company's growth. With this conviction, we launched an indigenous digital training platform i.e. Learning Management System – 'ODventure' – Organisation Development venture this year to build an agile and future-ready organization. The purpose is to make learning accessible to all and allow the flexibility to access the training course from anywhere and at any time. The LMS gives the employees full control over their learning which includes inbuilt assessments. Our training and development process ensures the right to education for all our employees including contract laborers across locations. In order to gauge the reception/learning, Pre- Post Assessment is conducted for the training.

### Employee Training Details

Training Man-Hours			
Year	2021-2022	2020-2021	2019-2020
Total	69497	26756	36227



# Salient Human Rights Issues, Taking Action & Results

## Training Man-hours

Training Categories	Total Training Manhours		
	FY 2021-22	FY 2020-21	FY 2019-20
Behavioral	11850	10740	5812
Technical	7607	7020	10616
Safety	6182	3663	7821
Management System Topics	16602	1003.7	6158
Social Accountability & Social Responsibility	4834	1395	1567
Prevention of Sexual Harassment (POSH)	3157	889	251
Fair Business Practices	8631	1491	3096
Cyber Security	3068	597	906
Human Rights	3928	-	-
Gender Sensitivity	3638	NA	NA

## Details of Contractor Training

Training Man-Hours			
Year	2021-2022	2020-2021	2019-2020
Total	6824	6535	15705

Furthermore, to measure the implementation of learning from the video-based training programs and the change in behavior, Training Effectiveness is measured by making the employees complete the post-learning action plan and gathering feedback from the managers/ HOD afterward.

## 11. Engagement, Participation, Recognition, Freedom Of Speech & Association

GFL places a high value on employee engagement. We make certain that all events are celebrated with our employees. Regular employee engagement programs such as Connectalkavity, HR Connect, Townhall, Skip meetings, Let's Talk, Newsletters, PHRRO, Prayas,



Volleyball Tournament at Dahej

festival celebrations, family day, sports tournaments, and so on are held across locations with the goal of strengthening the bond between employees and the company. All our employee engagement and participation initiatives and the guidelines thereof are in line with the tenets of human rights.



Garba Night at Vadodara



HR Connect at Vadodara

Our Company believes in motivating and retaining talent by identifying and recognizing the employees for the good work done. This is done through a digitalized platform – 'SPOT ON'. Apart from rewarding performance, GFL also rewards employees for long service to the Organisation

## Number of Spot-On Recognition

FY 2021-2022	FY 2020-21	FY 2019-20
2020	2021	1666



Spot On Felicitation at Dahej



Long Service Felicitation Programme at Noida

To recognize and appreciate employees, who have demonstrated exemplary leadership in building the business with consistency and sustainable growth, above and beyond the requirements, the 'Star Achiever Award' was announced this year as a part of the annual recognition scheme. As per the star achiever scheme, the Star Performers were identified across locations (5% of the total population) and awarded by the Senior Management.



Star Achievers at Noida



Star Achievers at Ranjitnagar

Our employees are encouraged to provide workplace improvement suggestions through the 'Prayas' platform – an employee suggestion platform available to all GFL employees.

## Number of Suggestions received (Prayas)

2021-22	2020-21	2019-20
593	362	1003

The company conducts an Employee Effectiveness and Employee Satisfaction Survey twice a year to gather employee feedback and ideas that can be used to continuously innovate and improve its processes.

Employee Effectiveness (EE2) Survey is conducted to determine employee enablement and employee engagement score based on 12 elements related to Employee Engagement & Employee Enablement. This survey is conducted for the employees of the level Engineer/Executive & above.

An Employee Satisfaction (E-SAT) survey is conducted based on 6 elements – Team Management, Human Resource Functions & Policies, Employee Development, Employee Welfare, Safety & PPEs & Reward & Recognition. This is conducted for technician-level employees.

Based on the survey results, the company implemented flexi timing, extended weekends, and other employee-friendly initiatives.

# Salient Human Rights Issues, Taking Action & Results

## Employee Effectiveness Survey score FY2021-22

Location	Participation%	Survey Score
Dahej A	68.39	4.09
Dahej B	86.11	3.76
Ranjitnagar	76.82	4.04
Vadodara	100.00	4.16
Noida	85.82	3.72

## Employee Satisfaction Survey score FY2021-22

Location	Participation%	Survey Score
Dahej A	73.12	3.58
Dahej B	80.36	3.49
Ranjitnagar	90.00	3.85

The Ranjitnagar team ranked among the top 15 companies by the Quality Circle Forum of India (QCFI) - Vadodara Chapter and received another renowned ‘Bright Spark’ award under the theme: ‘7 Mudras’, focused on waste reduction as a part of lean manufacturing.



GFL Team at Ranjitnagar

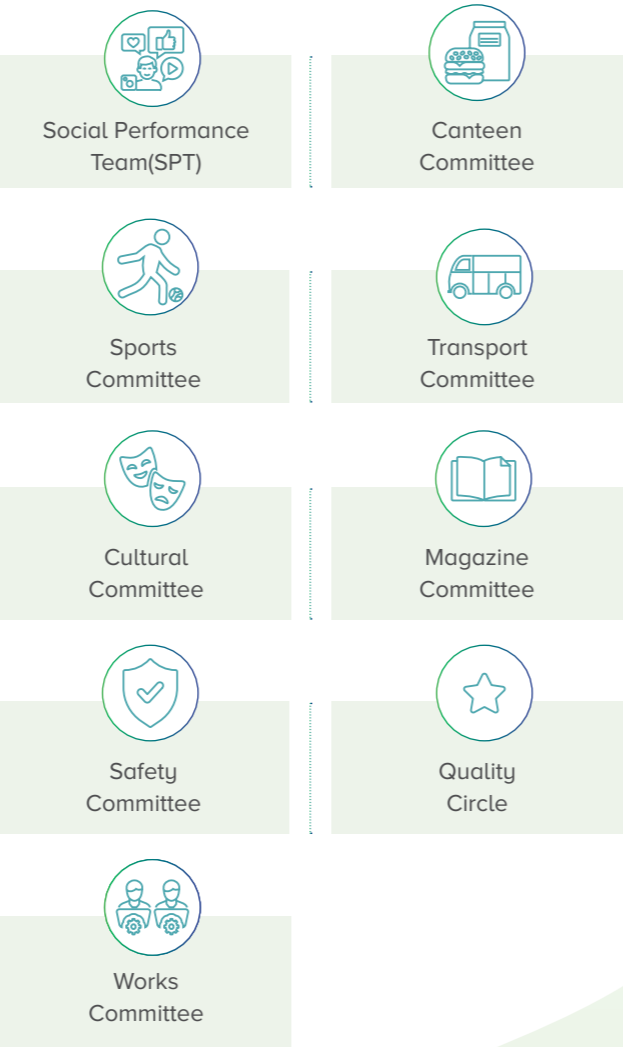
GFL participated for the first time in the QCFI Vadodara chapter and won the ‘Gold Category Award’ under the theme - “Tiny quality leap forward ensure growth & sustainability”.



Winners at QCFI, Vadodara

We recognize the fact that employees have the inherent right to collective bargaining. We respect the rights of all our employees. to form associations in accordance with the laws applicable for maintaining workplace democracy. Through its HR policy: **HR/43 – GUIDELINE ON EMPLOYEE RELATION**, GFL upholds this right of all employees. The above guideline is a reiteration of the company to uphold the principles of the following ILO conventions: 87, 98, and 135.

At each location, we have Work Committees under the Industrial Disputes Act, 1947, representing workmen, which engage periodically with the Management to discuss and resolve working condition-related issues. Additionally, we have established various other committees for the continuous participation of workmen in different areas of their work life. These include:



These committees regularly meet and discusses issues relating to respective areas with management representatives. All employees, contract labour and subcontractor are made aware of their right to exercise Freedom of Association, right to peaceful meetings as part of the Social Accountability Workshop. Not only our direct workmen, the company recognizes the right of association and collective bargaining by the Contract Labors and also participates in bargaining meetings.

The Contract Labours are represented by the Panchmahal Kamdar Union, which represents around 300 contract labours. No employees of the Company are covered under collective bargaining agreements.

We adhere to the provisions of section 9A of the Industrial Dispute Act, 1947, for any significant changes to the terms of employment. We recognize that the right to exercise freedom of association and collective bargaining may be at risk in the operations of our suppliers and contractors. As such, under the Sustainable Procurement Governance structure of

GFL, all suppliers/vendors must provide the Company a declaration that such rights are protected for their workmen.

There are no operations where the right to exercise freedom of association and collective bargaining is found to be at significant risk.

## Grievance Mechanism

Our company has several platforms to seek feedback and suggestions from its workforce and voice their concerns about the violations of the laws & company policies.

This is done through the digital platform – ethics line, feedback surveys, employee associations, etc. Any stakeholder if confronted with any such violation may also report the concern on Ethics Line [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in) Additionally, employees can also raise concerns and give suggestions through our online platform HR Buddy. Our sites are equipped with suggestion boxes where employees and workers can submit their grievances anonymously.

## Details of Grievance Handling Platform

Sr. No	Grievance Handling Platform	No. of Complaints Received	No. of Complaints Resolved	No. of Complaints Received	No. of Complaints Resolved	No. of Complaints Received	No. of Complaints Resolved
		FY22	FY22	FY21	FY21	FY20	FY20
1	HR Buddy	77	50	104	101	157	146
2	Ethics Line	5	5	5	5	5	5
3	Suggestion Box	25	21	12	12	12	12

Suggestions and grievance boxes are installed in various locations where our employees can register complaints in this regard.

During FY 2021-22, 5 complaints were received from stakeholders regarding the Code of Conduct, Whistleblower & Equal Employment Opportunity in employment (as mentioned in point 8 – Disciplinary practices), and the complaints were resolved by the end of the year.

# Annexure – 1

## UNGC Principles Reporting Framework Index

Section of the Framework	Location in this report
<b>PART A – GOVERNANCE OF RESPECT FOR HUMAN RIGHTS</b>	
A.1 What does the company say publicly about its commitment to respect human rights?	Page 18-20
A1.1 How has the public commitment been developed?	Page 18-20
A1.2 Whose Human Rights does the commitment address?	Page 22-23
A1.3 How is the public commitment disseminated?	Page 24
Embedding Respect for Human Rights	
A.2 How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?	Page 18-20
A2.1 How is day-to-day responsibility for human rights performance organized within the company, and why?	Page 21
A2.2 What kinds of human rights issues are discussed by senior management and by the Board, and why?	Page 21-23
A2.3 How are employees and contract workers made aware of the ways in which respect of human rights should inform their decisions and actions?	Page 20,24, 41-42
A2.4 How does the company make clear in its business relationships the importance it places on respect for human rights?	Page 20, 27-29
A2.5 What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	Page 25-26
<b>PART B – DEFINING THE FOCUS OF REPORTING</b>	
B1 Statement of Salient Issues	Page 22-23
B2 Determination of Salient Issues	Page 22-23
B3 Choice of Focal Geographies	-
B4 Additional Severe Impacts	Page 25-26
<b>PART C – MANAGEMENT OF SALIENT HUMAN RIGHTS ISSUES</b>	
C1 Does the company have any specific policies that address its salient human rights issues and, if so, what are they?	Page 15, 20,30-45
C1.1 How does the company make clear the relevance and significance of such policies to those who need to implement them?	Page 20,24, 27-28
C2 What is the company’s approach to stakeholders’ engagement in relation to salient human rights issues?	Page 22-23
C2.1 How does the company identify which stakeholders to engage with in relation to salient issues, and when and how to do so?	Page 20;22-23
C2.2 Which stakeholders has the company engaged with regarding each salient issue, and why?	Page 30-45
C2.3 How have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	Page 22-23; 25-26; 42-44
C3 How does the company identify any changes in the nature of each salient human rights issue over time?	Page 25-26
C3.1 Were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	Page 25-26
C3.2 Did any severe impacts occur that were related to a salient issue and if, so what were they?	Page 25-26
C4 How does the company integrate its findings of each salient human rights issue into its decision-making processes and actions?	Page 25-26
C4.1 How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in findings and implementing solutions?	Page 30-45
C4.2 When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	Page 22-23
C4.3 What action has the company taken to prevent or mitigate potential impacts related to each salient issue?	Page 30-45
C5 How does the company know if efforts to address each salient human rights issue are effective in practice?	Page 25-26
C5.1 What specific examples from the reporting period illustrate if each salient issue is being managed effectively?	N/A
C6 How does the company enable effective remedy if people are harmed by its actions or decisions in relation to the salient human rights issues?	Page 45
C6.1 Through what means can the company receive complaints or concerns related to each salient issue?	Page 21; 45
C6.2 How does the company know if people feel able and empowered to raise complaints or concerns?	Page 30-45
C6.3 How does the company process complaints and assess the effectiveness of outcomes?	Page 21,45
C6.4 What were the trends and patterns in the complaints or concerns and their outcomes regarding the salient issues, and what lessons have the company learned?	Page 25-26, 40, 45
C6.5 Did the company provide or enable remedy for any actual related to a salient issue and, if so, what are typical or significant examples?	Page 37, 42-44

# Annexure – 2

## Mapping Our Labour & Human Resource Actions in support of Human Rights & SDG

Category	Sub Category	Reference to Social Accountability & Human Rights Progress Report 2021-22	Our Actions in support of Human Rights & SDG																													
			Equality	Non Discrimination	Social Security	Work	Health	Family Life	Cultural Life	Rest & Leisure	Freedom From Slavery	From Forced Labour	Just & Favourable condition of Work	Peaceful Assembly	Freedom of Association	Adequate Standard of Living	Education	Opinion & Information	Minorities	Protection of Child	Self Determination	Own Property	Fair Public Hearing	Privacy	Freedom from Torture & Degrading Treatment	Freedom of Movement	Nationality	Religion or Belief	Participate in Government & In Free Elections	To do one's duty	Remedy	Recognition
Labour	Talent Acquisition and Retention	Page no: 30-31	●																									●				
	Terms of Employment	Page no: 30-31; 38		●	●																									●		
	Work Life Balance	Page no: 37					●																							●		
	Details of Leaves Available to Employees	Page no: 37						●																						●		
	Working Hours	Page no: 38									●																					
	Remuneration	Page no: 90	●	●								●																				●
	Performance Management	Page no: 31	●	●									●																			
	Training and Education & Talent Development	Page no: 41-42	●	●									●																			
	Employee Engagement & Participation	Page no: 42-44								●																						
	Employee Communication	Page no: 42-44															●															
	Diversity & Women Empowerment	Diversity & Women Empowerment	Page no: 31	●	●																							●				
Social Accountability	Non-Discrimination Practices	Page no: 30-31	●	●															●								●					
	Prevention of Child Labour	Page no: 33																														
	Prevention of Forced /Bonded/ Compulsory Labour	Page no: 33									●																					
	Security Practices	Page no: 32						●																								
	Local Hiring	Page no: 39	●	●																		●										
	Rights of Indigenous People	Page no: 39	●	●																		●	●								●	
	Social Accountability in Supply Chain	Page no: 27															●															

# Annexure - 2

## Mapping Our Labour & Human Resource Actions in support of Human Rights & SDG

Category	Sub Category	Reference to Social Accountability & Human Rights Progress Report 2021-22	Our Actions in support of Human Rights & SDG	SDG connection to Human Rights
Ethical Business Practices	Responsible Sales & Marketing Practices	Page no: 28	<ul style="list-style-type: none"> <li>Equality</li> <li>Non Discrimination</li> <li>Social Security</li> <li>Work</li> <li>Health</li> <li>Family Life</li> <li>Cultural Life</li> <li>Rest &amp; Leisure</li> <li>Freedom From Slavery</li> <li>From Forced Labour</li> <li>Just &amp; Favourable condition of Work</li> <li>Peaceful Assembly</li> <li>Freedom of Association</li> <li>Adequate Standard of Living</li> <li>Education</li> <li>Opinion &amp; Information</li> <li>Minorities</li> <li>Protection of Child</li> <li>Self Determination</li> <li>Own Property</li> <li>Fair Public Hearing</li> <li>Privacy</li> <li>Freedom from Torture &amp; Degrading Treatment</li> <li>Freedom of Movement</li> <li>Nationality</li> <li>Religion or Belief</li> <li>Participate in Government &amp; In Free Elections</li> <li>To do one's duty</li> <li>Remedy</li> <li>Recognition</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> <li>29</li> <li>30</li> <li>31</li> <li>32</li> <li>33</li> <li>34</li> <li>35</li> <li>36</li> <li>37</li> <li>38</li> <li>39</li> <li>40</li> <li>41</li> <li>42</li> <li>43</li> <li>44</li> <li>45</li> <li>46</li> <li>47</li> <li>48</li> <li>49</li> <li>50</li> <li>51</li> <li>52</li> <li>53</li> <li>54</li> <li>55</li> <li>56</li> <li>57</li> <li>58</li> <li>59</li> <li>60</li> <li>61</li> <li>62</li> <li>63</li> <li>64</li> <li>65</li> <li>66</li> <li>67</li> <li>68</li> <li>69</li> <li>70</li> <li>71</li> <li>72</li> <li>73</li> <li>74</li> <li>75</li> <li>76</li> <li>77</li> <li>78</li> <li>79</li> <li>80</li> <li>81</li> <li>82</li> <li>83</li> <li>84</li> <li>85</li> <li>86</li> <li>87</li> <li>88</li> <li>89</li> <li>90</li> <li>91</li> <li>92</li> <li>93</li> <li>94</li> <li>95</li> <li>96</li> <li>97</li> <li>98</li> <li>99</li> <li>100</li> </ul>
	Communication channels to report violations in Fair Business Practices	Page no: 45	<ul style="list-style-type: none"> <li>Equality</li> <li>Non Discrimination</li> <li>Social Security</li> <li>Work</li> <li>Health</li> <li>Family Life</li> <li>Cultural Life</li> <li>Rest &amp; Leisure</li> <li>Freedom From Slavery</li> <li>From Forced Labour</li> <li>Just &amp; Favourable condition of Work</li> <li>Peaceful Assembly</li> <li>Freedom of Association</li> <li>Adequate Standard of Living</li> <li>Education</li> <li>Opinion &amp; Information</li> <li>Minorities</li> <li>Protection of Child</li> <li>Self Determination</li> <li>Own Property</li> <li>Fair Public Hearing</li> <li>Privacy</li> <li>Freedom from Torture &amp; Degrading Treatment</li> <li>Freedom of Movement</li> <li>Nationality</li> <li>Religion or Belief</li> <li>Participate in Government &amp; In Free Elections</li> <li>To do one's duty</li> <li>Remedy</li> <li>Recognition</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> <li>29</li> <li>30</li> <li>31</li> <li>32</li> <li>33</li> <li>34</li> <li>35</li> <li>36</li> <li>37</li> <li>38</li> <li>39</li> <li>40</li> <li>41</li> <li>42</li> <li>43</li> <li>44</li> <li>45</li> <li>46</li> <li>47</li> <li>48</li> <li>49</li> <li>50</li> <li>51</li> <li>52</li> <li>53</li> <li>54</li> <li>55</li> <li>56</li> <li>57</li> <li>58</li> <li>59</li> <li>60</li> <li>61</li> <li>62</li> <li>63</li> <li>64</li> <li>65</li> <li>66</li> <li>67</li> <li>68</li> <li>69</li> <li>70</li> <li>71</li> <li>72</li> <li>73</li> <li>74</li> <li>75</li> <li>76</li> <li>77</li> <li>78</li> <li>79</li> <li>80</li> <li>81</li> <li>82</li> <li>83</li> <li>84</li> <li>85</li> <li>86</li> <li>87</li> <li>88</li> <li>89</li> <li>90</li> <li>91</li> <li>92</li> <li>93</li> <li>94</li> <li>95</li> <li>96</li> <li>97</li> <li>98</li> <li>99</li> <li>100</li> </ul>
	Reporting of Incidents	Page no: 45	<ul style="list-style-type: none"> <li>Equality</li> <li>Non Discrimination</li> <li>Social Security</li> <li>Work</li> <li>Health</li> <li>Family Life</li> <li>Cultural Life</li> <li>Rest &amp; Leisure</li> <li>Freedom From Slavery</li> <li>From Forced Labour</li> <li>Just &amp; Favourable condition of Work</li> <li>Peaceful Assembly</li> <li>Freedom of Association</li> <li>Adequate Standard of Living</li> <li>Education</li> <li>Opinion &amp; Information</li> <li>Minorities</li> <li>Protection of Child</li> <li>Self Determination</li> <li>Own Property</li> <li>Fair Public Hearing</li> <li>Privacy</li> <li>Freedom from Torture &amp; Degrading Treatment</li> <li>Freedom of Movement</li> <li>Nationality</li> <li>Religion or Belief</li> <li>Participate in Government &amp; In Free Elections</li> <li>To do one's duty</li> <li>Remedy</li> <li>Recognition</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> <li>29</li> <li>30</li> <li>31</li> <li>32</li> <li>33</li> <li>34</li> <li>35</li> <li>36</li> <li>37</li> <li>38</li> <li>39</li> <li>40</li> <li>41</li> <li>42</li> <li>43</li> <li>44</li> <li>45</li> <li>46</li> <li>47</li> <li>48</li> <li>49</li> <li>50</li> <li>51</li> <li>52</li> <li>53</li> <li>54</li> <li>55</li> <li>56</li> <li>57</li> <li>58</li> <li>59</li> <li>60</li> <li>61</li> <li>62</li> <li>63</li> <li>64</li> <li>65</li> <li>66</li> <li>67</li> <li>68</li> <li>69</li> <li>70</li> <li>71</li> <li>72</li> <li>73</li> <li>74</li> <li>75</li> <li>76</li> <li>77</li> <li>78</li> <li>79</li> <li>80</li> <li>81</li> <li>82</li> <li>83</li> <li>84</li> <li>85</li> <li>86</li> <li>87</li> <li>88</li> <li>89</li> <li>90</li> <li>91</li> <li>92</li> <li>93</li> <li>94</li> <li>95</li> <li>96</li> <li>97</li> <li>98</li> <li>99</li> <li>100</li> </ul>
	Human Rights & Community Development	Page no: 29	<ul style="list-style-type: none"> <li>Equality</li> <li>Non Discrimination</li> <li>Social Security</li> <li>Work</li> <li>Health</li> <li>Family Life</li> <li>Cultural Life</li> <li>Rest &amp; Leisure</li> <li>Freedom From Slavery</li> <li>From Forced Labour</li> <li>Just &amp; Favourable condition of Work</li> <li>Peaceful Assembly</li> <li>Freedom of Association</li> <li>Adequate Standard of Living</li> <li>Education</li> <li>Opinion &amp; Information</li> <li>Minorities</li> <li>Protection of Child</li> <li>Self Determination</li> <li>Own Property</li> <li>Fair Public Hearing</li> <li>Privacy</li> <li>Freedom from Torture &amp; Degrading Treatment</li> <li>Freedom of Movement</li> <li>Nationality</li> <li>Religion or Belief</li> <li>Participate in Government &amp; In Free Elections</li> <li>To do one's duty</li> <li>Remedy</li> <li>Recognition</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> <li>29</li> <li>30</li> <li>31</li> <li>32</li> <li>33</li> <li>34</li> <li>35</li> <li>36</li> <li>37</li> <li>38</li> <li>39</li> <li>40</li> <li>41</li> <li>42</li> <li>43</li> <li>44</li> <li>45</li> <li>46</li> <li>47</li> <li>48</li> <li>49</li> <li>50</li> <li>51</li> <li>52</li> <li>53</li> <li>54</li> <li>55</li> <li>56</li> <li>57</li> <li>58</li> <li>59</li> <li>60</li> <li>61</li> <li>62</li> <li>63</li> <li>64</li> <li>65</li> <li>66</li> <li>67</li> <li>68</li> <li>69</li> <li>70</li> <li>71</li> <li>72</li> <li>73</li> <li>74</li> <li>75</li> <li>76</li> <li>77</li> <li>78</li> <li>79</li> <li>80</li> <li>81</li> <li>82</li> <li>83</li> <li>84</li> <li>85</li> <li>86</li> <li>87</li> <li>88</li> <li>89</li> <li>90</li> <li>91</li> <li>92</li> <li>93</li> <li>94</li> <li>95</li> <li>96</li> <li>97</li> <li>98</li> <li>99</li> <li>100</li> </ul>
Community Development Health & Safety	Occupational Health & Safety	Page no: 34-36	<ul style="list-style-type: none"> <li>Equality</li> <li>Non Discrimination</li> <li>Social Security</li> <li>Work</li> <li>Health</li> <li>Family Life</li> <li>Cultural Life</li> <li>Rest &amp; Leisure</li> <li>Freedom From Slavery</li> <li>From Forced Labour</li> <li>Just &amp; Favourable condition of Work</li> <li>Peaceful Assembly</li> <li>Freedom of Association</li> <li>Adequate Standard of Living</li> <li>Education</li> <li>Opinion &amp; Information</li> <li>Minorities</li> <li>Protection of Child</li> <li>Self Determination</li> <li>Own Property</li> <li>Fair Public Hearing</li> <li>Privacy</li> <li>Freedom from Torture &amp; Degrading Treatment</li> <li>Freedom of Movement</li> <li>Nationality</li> <li>Religion or Belief</li> <li>Participate in Government &amp; In Free Elections</li> <li>To do one's duty</li> <li>Remedy</li> <li>Recognition</li> </ul>	<ul style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> <li>29</li> <li>30</li> <li>31</li> <li>32</li> <li>33</li> <li>34</li> <li>35</li> <li>36</li> <li>37</li> <li>38</li> <li>39</li> <li>40</li> <li>41</li> <li>42</li> <li>43</li> <li>44</li> <li>45</li> <li>46</li> <li>47</li> <li>48</li> <li>49</li> <li>50</li> <li>51</li> <li>52</li> <li>53</li> <li>54</li> <li>55</li> <li>56</li> <li>57</li> <li>58</li> <li>59</li> <li>60</li> <li>61</li> <li>62</li> <li>63</li> <li>64</li> <li>65</li> <li>66</li> <li>67</li> <li>68</li> <li>69</li> <li>70</li> <li>71</li> <li>72</li> <li>73</li> <li>74</li> <li>75</li> <li>76</li> <li>77</li> <li>78</li> <li>79</li> <li>80</li> <li>81</li> <li>82</li> <li>83</li> <li>84</li> <li>85</li> <li>86</li> <li>87</li> <li>88</li> <li>89</li> <li>90</li> <li>91</li> <li>92</li> <li>93</li> <li>94</li> <li>95</li> <li>96</li> <li>97</li> <li>98</li> <li>99</li> <li>100</li> </ul>

### SDG connection to Human Rights

## Annexure - 3

### Mapping of GFL's HR Principles with various Sustainability Standards & UN Human Rights

No	GFL's Human Resource Principles	UNGC Principles	ISO 26000 Standards	SA 8000 Standards	NVG Principles	Sustainable Development Goals (SDGs)	Human Rights
1	Building safe, Healthy and Secure workplace with the involvement of all employees.		Health and Safety at work -6.4.6	3. Health and Safety	Principle 3-Businesses Should promote the well-Being of all employees	3, 8	Right to Adequate Standard of Living
2	Implement robust, fair, transparent and non-discriminatory process to attract, develop and retain Talent needed for business delivery and growth.	Principle 6-elimination discrimination in respect of employment and occupation	Condition of work and social Protection-6.4.4	5.Discrimination	Principle 3-Businesses should promote the well-Being of all employees	1,5,10	Right to be Free & Equal and Freedom from Discrimination
3	Uphold and respect Human Dignity, Equality and Human Rights at the workplace.	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence; Principle 2: make sure they are non-complicit in human rights abuse, Principle 4: the elimination of all forms of forced and compulsory labor; Principle 5: the effective abolition of child labor	Human Right-6.3 Due Diligence-6.3.3 Human Rights risk situation-6.3.4 Avoidance of complicity-6.3.5 Discrimination and vulnerable groups-6.3.7 Civil and Political Rights-6.3.8 Economic, Social and cultural Rights-6.3.8	1.Child labor 2.Forced or compulsory labor 3.Disciplinary Practices	Principle 5-Businesses should respect and promote human rights	5,10	Right to be Free & Equal and Freedom from Discrimination
4	Provide Continuous learning opportunities for the growth and development of all employees	Principle 6-elimination discrimination in respect of employment and occupation	Human Development training in the workplace-6.4.7	5. Discrimination	Principle 3-Businesses Should promote the well-being of all employees	4	Right to Education
5	Ensure continuous two-way communication and participation of employees and respect their views and opinion and involve them in decision making	Principle 3- Businesses should uphold the freedom of association and effective recognition bargaining of the right to collective bargaining	Employment and Employment Relation-6.4.3 Social Dialogue-6.4.5	9. Management System 4-Freedom of Association and Rights to Collective Bargaining	Principle 3-Businesses Should promote the well-being of all employees	10	Right to Freedom of Opinion & Expression
6	Establish meritocracy without any bias or discrimination in connection to performance evaluation, career progression, rewards and recognition.	Principle 6-elimination discrimination in respect of employment and occupation	Employment and Employment Relation-6.4.3 Social Dialogue-6.4.5		Employment and Employment Relation-6.4.3 Social Dialogue-6.4.5	5,10	Right to be Free & Equal and Freedom from Discrimination; Right to Recognition as a Person before the Law

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### Mapping of GFL's HR Principles with various Sustainability Standards & UN Human Rights

No	GFL's Human Resource Principles	UNGC Principles	ISO 26000 Standards	SA 8000 Standards	NVG Principles	Sustainable Development Goals (SDGs)	Human Rights
7	Pay for Performance based on internal and external parity.	Principle 6-elimination discrimination in respect of employment and occupation	Condition of work and social Protection	8.Remuneration	Principle 3-Businesses Should promote the well-Being of all employees	5,10	Right to be Free & Equal and Freedom from Discrimination Right to Recognition as a Person before the Law
8	Encourage creativity and innovation to fuel growth.		Social Dialogue-6.4.5		Principle 3-Businesses Should promote the well-Being of all employees	4,10	Right to Education, Right to Freedom of Opinion & Expression
9	Create and engaged work environment of teamwork and camaraderie with a bias for responsible execution and excellence.	Principle 4: the elimination of all forms of forced and compulsory labor, Principle 6-elimination discrimination in respect of employment and occupation	Human development and training in the workplace-6.4.7	5.Discrimination	Principle 3-Businesses Should promote the well-Being of all employees	4,5,8	Right to Freedom from Slavery; Freedom from Torture & Degrading Treatment
10	Drive social accountability and responsibility and ensure ethical governance for responsible execution and excellence	Business should work against all forms of corruption, including extortion and bribery	Anti-corruption-6.6.3 Responsible Political involvement -6.6.4 Community involvement and development-6.8	9.Management System	Principle 1- Business should conduct and govern with ethics, transparency and accountability	1-17	Right to Human Rights

## Annexure – 4

### Assurance Statement 2022



#### DQS- Independent Assurance Statement

##### To the Management and Stakeholders of Gujarat Fluorochemicals Limited (GFL),

DQS has been engaged by Gujarat Fluorochemicals Limited (GFL) to provide independent assurance over Human Rights Progress Report - 2022 based on United Nations' Guiding Principles on Business and Human Rights in the areas of Labor and Human Rights, Environment, and Anti- Corruption. The engagement took place from 22nd November 2022 to 30th Nov 2022 through virtual assessment.

##### Objectives

The objective of this assurance engagement was to independently express conclusions on underlying reporting processes and validate qualitative and quantitative claims, to limit misinterpretation by stakeholders and increase the overall credibility of the reported information and data.

The objectives also include the assessment of the extent to which the employees are aware of the organization's Human Rights policies and how those are being executed on ground. This was done in two ways.

1. Interviewing cross section of people from all business sites, functions, and levels.
2. Randomly selecting samples from the given data of employees and contractor laborer's and verifying implementation of Human Rights policies regarding the applicable labor laws.

##### Scope of Assurance

The assurance encompassed the entire report and focused on all figures, statements and claims related to Human Rights during the reporting period Jan 2021 to Nov 2022. More specifically, this included:

- Statements, information, and performance data contained within the Social Accountability and the Human Rights Progress report.
- GFL's management approach of Human Rights related material issues; and
- GFL's reported data and information as per the requirements of the UN Guiding Principles on Business and Human Rights (UNGP)

The assurance engagement was performed in accordance DQS framework on Human Rights based on Guiding Principles on Business and Human Rights as specified by the United Nations and United Nations Global Compact, a set of ten guiding principles regarding human rights, labor, environment, and anti-corruption, including the following:

- Evaluating the company's Human Rights framework and processes using the Protect, Respect & Remedy criteria and effectiveness criteria for grievance mechanisms from UNGP (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, Source of Continuous Learning. Based on Engagement and Dialogue)
- Evaluating the quality of the reported Human Rights performance information
- Evaluate whether the processes to identify and assess adverse human rights risks and impacts in the operations and throughout the business relationships, including throughout the supply chain.
- Evaluate processes for prioritizing the salient human rights issues, meaning the most severe impacts on people connected to your business.



- Evaluate the salient human rights impacts, including impacts in the supply chain.
- Evaluate actions to prevent, mitigate, and remediate adverse impacts in relation to the salient human rights issues, and how these actions apply across the value chain; and
- Evaluate the approach to tracking the actions taken, how those actions are evaluated and revised for effectiveness, and the effectiveness of the approaches in addressing those adverse impacts.

The report has been self-declared to comply with the in accordance – UN’s Guiding Principles on Business and Human Rights, regarding human rights, labor, environment, and anti-corruption”.

Operational Boundary: Verification of Corporate office at Noida of Gujarat Fluorochemicals Limited (GFL) along with specific production sites in India - Dahej Plant, Jolva plant, Ranjit Nagar Plant, Regional Office at Vadodara (India), Corporate office at Noida and Subsidiary offices in Texas (USA) and Hamburg (Germany).

#### Level of assurance and limitations

A moderate level of assurance under DQS framework on Human Rights was provided for this engagement. Information and performance data subject to assurance is limited to the content of the Human Rights Progress report. The assurance did not cover financial data, technical descriptions of buildings, equipment, and production processes, on shop safety practices or other information not related to Human Rights or already supported by existing documents, such as third-party audits or certifications and previous GFL annual reports.

#### Independence and Competences of the Assurance Provider

The DQS Group is an independent professional services firm that provides assurance on sustainability disclosures under the Global Reporting Initiative (GRI), Human Rights, CDP and other specialized management and reporting mechanisms.

Independent verifiers have not been involved in the development of the report nor have they been associated with GFL’s sustainability program, data collection or strategic processes.

DQS Group ensures that the assurance team possesses the required competencies, maintained neutrality, and performed ethically throughout the engagement. Further information, including a statement of impartiality, can be found at: [www.dqs-cfs.com](http://www.dqs-cfs.com). The management of GFL was responsible for the preparation of the sustainability part of the Corporate Report and all statements and figures contained within it.

#### Assurance methodology

The assurance procedures and principles used for this engagement were drawn from the International Standards and methodology for data verification developed by DQS as below:

1. Based on Human Rights Progress Report on UN’s Guiding Principles on Business and Human Rights. Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption, GFL have identified selected corporate KPIs and data sets, which are classified according to the relevant data owners and the type of evidence required for the verification process.
2. Carry out interviews with key functional managers and data owners at GFL



3. Data quality verification included the following:
  - a. Enquiring about the quantitative and qualitative aspects of the KPI disclosures, including performance information, policies, procedures, and underlying management systems.
  - b. Requesting evidence of the data sources and explanation of relevant collection and calculation methods to substantiate the figures and claims.
  - c. Effectiveness of grievance mechanisms based on UNGP criteria (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, Source of Continuous Learning. Based on Engagement and Dialogue). This was learnt during virtual interaction with the Company secretary office and review of the minutes of the meeting of the Ethics Committee.
4. Challenging the KPI claims, where possible, confirming the presented evidence, including calculation methods, criteria, and assumptions, with multiple data owners and other documentation from internal and external sources.
5. Assess the collected information and provide recommendations for immediate correction wherever required or for future improvement of the non-financial indicators’ verification within the scope.

#### Key observations and recommendations

##### Strengths:

1. Strong management commitment is noted towards sustaining and upholding the UN’s Guiding principles on Business and Human Rights in the focus areas of Labor and Human Rights, Environment, and Anti-Corruption.
2. Organization wide awareness created about Human Rights to all concerned stakeholders by training, special campaigns throughout the period.
3. Strong HR structure and robust HR processes for monitoring through structured reviews.
4. Initiatives and structured grievance mechanisms to address Human Rights is highly appreciable. E.g., Social Performance teams and Ethics committees.
5. Initiation for the Development of proactive and high performing safety culture utilizing world class consultants. “I am the Safety Leader” campaign is a unique initiative.
6. Sustainable Procurement system well established and progressive increase in number of key suppliers for second party audits.
7. Local community at Ranjit Nagar is well engaged and sustainable, women empowerment initiatives have been taken through education, skilling, and health support.
8. Responsible sales and marketing policy is well established, and organization is using product life cycle assessment approach progressively.

##### Opportunities for Improvement:

1. Enterprise-wide risk assessment may include Human Rights related risk assessment at overall organization level, each unit level, department/function level for better clarity and focus.
2. Contractor laborer’s related legal compliance systems management processes can be further strengthened to enhance Human rights realization.



3. OH&S performance indices (both proactive and reactive) shall be included in the Human Rights performance report to make the report more balanced.
4. Cost of Accidents evaluation and use for incident prevention, safety sensitization is suggested for further improvement.
5. Social LCA requirements can be added in the product LCA process.
6. Internal audits for Human Rights realization can be undertaken as a system to improve tracking and monitoring progress.

### Evaluation of the adherence to DQS framework on Human Rights

**Inclusivity** - How the organization engages with stakeholders and enables their participation in identifying issues and finding solutions related to Human Rights.

The stakeholder identification and engagement process are well documented and implemented through GFL Stakeholder engagement program and the Report brings out key stakeholder concerns as material aspects of significant stakeholders.

In our view, the level at which the Report adheres to this principle is all inclusive and very good. Therefore, it is recommended that GFL should continue with the planned process of direct dialogue with the stakeholders at determined intervals.

**Materiality** - How the organization recognizes issues that are relevant and significant to itself and its stakeholders.

The Report addresses the range of issues related to Human Rights that GFL and its stakeholders have identified as being of material importance. The identification of material issues has considered both internal assessments of risks and opportunities to the business, as well as stakeholders' views and concerns. A process of stakeholder engagement through sustainability board meetings identified the material issues. The Report fairly brings out aspects and topics and its respective boundaries for the diverse operations of GFL. In our view, the level at which the Report adheres to this principle is very good. It is recommended that GFL continues with this process.

**Responsiveness** - How the organization responds to stakeholder issues and feedback through decisions, actions, performance, and communication.

As per the UN's guidelines,

1. It is the state duty to protect against human rights abuses, including those by business.
  - GFL has robust systems and processes to ensure legal compliance in corporate governance, Financial, Labour laws and EHS legislations applicable to the business.
2. It is the corporate responsibility to respect human rights.
  - GFL has demonstrated an excellent level of execution of its Human Rights policies throughout the organisation.
3. The need for better access to remedy when corporate-related abuses have occurred.
  - GFL has robust and stakeholder friendly systems and communication means for reporting any potential or actual violation of Human rights.
  - GFL has multi-level remedial systems including the Ethics committee at the apex level to resolve and find remedies on any issue with respect to Human Rights.



GFL is responding to those issues that it has identified as material and demonstrates this in its policies, objectives, indicators, and performance targets. The organization and its stakeholders can use the reported information as a reasonable basis for their opinions and decision-making. The company has taken various initiatives towards creating awareness, effective due diligence process and excellent grievance mechanism. The responses to material aspects are fairly articulated in the report, i.e., disclosures on GFL's policies and management systems including governance. In our view, the level at which the Report adheres to this principle is **Excellent and can be benchmarked by other businesses**.

**Impact** - How the organization monitors, measures, and ensures accountability for how its actions affect their broader ecosystems. GFL has implemented systems to monitor and measure its Human Rights impacts. Identified impacts are incorporated into both stakeholder engagement as well as the periodic materiality assessment process. The corporate report discloses impacts in a balanced and effective way, indicating both realized and unrealized goals. In our view, the level at which the Report adheres to this principle is **very good**.

### Conclusion

Based on a moderate assurance engagement according to the above-listed criteria, nothing has come to our attention that causes us to believe that the Human Rights related strategies of GFL, and its Human Rights related key performance indicators defined in the 2022 Human Rights Progress Report are materially misstated.

The GFL Human Rights Progress Report of 2022 is in line with the UNGP Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption. The material aspects and

their boundaries within and outside of the organization are properly defined in accordance with DQS Human Rights framework.

GFL has made significant strides to introduce innovative solutions toward mitigating Human Rights related impacts and influence supply chain partners in the process. Continued alignment of risk assessments, stakeholder engagement processes, materiality and strategy will further strengthen the Human Rights Progress of GFL.

**DQS vehemently recommends all Indian business centers and commercial houses to benchmark GFL for their efforts on Human Rights policy development, respecting Human Rights throughout their supply chains, excellent tracking and monitoring systems and mechanisms for grievance reporting and redressal.**

On behalf of the DQS India assurance team.

December 12th, 2022.

Best regards,

**Dr. K. Murugan**

Managing Director & CEO

**DQS India**

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## Gujarat Fluorochemicals Limited

Social Accountability & Human Rights  
Progress Report - **2021-22**

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