

1. BACKGROUND:

As per United Nations of Global Compact, Human rights mean that every person around the world deserves to be treated with dignity and equality. Basic rights include freedom of speech, privacy, health, life, liberty and security, as well as an adequate standard of living. These are the universal rights which are inherent in all the human beings whatever their nationality, place of residence, ethics or national origin, sex, colour, religion, language or other status. All individuals are entitled to enjoy human rights without any discrimination. Our Company, that is Gujarat Fluorochemicals Limited and its subsidiaries is committed to respect human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognized frameworks including the Social Accountability 8000 International Standard, UN Global Compact principles, ISO26000, National Voluntary Guidelines on Social, Environment & Economic Responsibilities and in compliance with all applicable laws and regulations, including while being committed and continues to improve these practices over the years.

In line with the UN Guiding Principles on Business and Human Rights, UN Declaration of Human Rights, International Covenant Civil & Political Rights, International Covenant on Economic, Social & Cultural Rights, UN Convention on the Rights of the Child, ILO Declaration on Fundamental Principles & Rights at Work ILO Core Conventions and other applicable laws of countries where we operate, the company recognizes the corporate responsibility to respect these principles and commit to 'know and show' this through ongoing human rights due diligence. Furthermore, our efforts include ongoing robust engagement with our business and major supply chain partners to mitigate potential human rights impacts beyond our direct control. Our support of internationally recognized Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

2. SCOPE & APPLICABILITY:

This policy applies to all employees associated with the Gujarat Fluorochemicals Limited and all its subsidiaries including GFL Americas LLC., GFL GmbH, GFL GM Fluorspar SA, GFCL EV Products Limited, GFCL Solar and Green Hydrogen Products Limited, Gujarat Fluorochemicals FZE Dubai, Gujarat Fluorochemicals Singapore Pte Limited, GFCL EV (SFZ) LLC, working at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, associated with the company.

The policy is applicable to all individual or organization, who/which come into contact with the Company or transact with the Company and also includes actual and potential clients, Suppliers, Vendors and Service Providers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures and government & public bodies (including their advisers, representatives and officials, politicians and political parties).

3. POLICY OBJECTIVES:

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

- Inform employees, business partners and customers of Company's commitment to respect and support human rights.
- Establish Company commitment to 'know and show' its respect for human rights through on going human rights due diligence.
- Adopt Responsible Business practices and governance structure that promote respect for Human Rights which are consistent with the UN Guiding Principles.

4. ORGANIZATIONAL COMMITMENT

The culture of integrity and compliance in GFL starts at the top. Foundation of the human rights approach at GFCL is its commitment to ensuring responsible social accountability fair compensation and safe working conditions in factories throughout its global supply chain. The Company is committed to sustaining the highest legal ethical & professional standards consistent with the UNGC Ten principles in the areas of Labor and Human Rights which is structured around the three independent but interrelated pillars of the 'Protect, Respect & Remedy' Framework i.e.

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a) Pillar I – The State duty to protect Human Rights

b) Pillar II – The Corporate Responsibility to respect Human Rights

c) Pillar III – Access to remedy for victims of Human Rights Abuses

Inspired by the United Nations Global Compact initiative, the United Nations Guiding Principles and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, our policy represents our understanding of the above standards respecting Human Rights and encouraging all our internal and external stakeholders – Employees, Suppliers, Vendors and Service Providers to exceed the requirements of this policy and promote best practices and continuous improvement throughout their operations.

We also expect them to use their best efforts to implement these standards with their Suppliers, Vendors and Service Providers and subcontractors.

We have following guidelines & policies in place relation to human rights issues:

1. HR/2 – RECRUITMENT & SELECTION OF CANDIDATES
2. HR/20 – GUIDELINES ON PERFORMANCE MANAGEMENT SYSTEM AND DEVELOPMENT PLAN
3. HR/21 – PERFORMANCE EVALUATION & TRAINING NEED ASSESSMENT FOR TECHNICIANS
4. HR/22 – PERFORMANCE ASSESSMENT OF ENGINEER/EXECUTIVE/CADRE EMPLOYEES
5. HR/28 – GUIDELINE ON SEPARATION PROCESS OF EMPLOYEES
6. HR/30 – GUIDELINE ON COMPLIANCE TO EMPLOYMENT & LABOUR LAWS
7. HR/42 – GUIDELINE ON GRIEVANCE PROCEDURE FOR EMPLOYEES/CONTRACTORS
8. HR/43 – GUIDELINE ON EMPLOYEE RELATION
9. HR/49 – GUIDELINE ON PREVENTION, PROHIBITION & REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE
10. HR/52 – GUIDELINE ON OVERTIME
11. HR/59 – GUIDELINE ON EMPLOYMENT OPPORTUNITY TO SONS OF THE SOIL
12. HR/61 - GUIDELINE ON FORCED BONDED LABOUR PROHIBITION
13. HR/62 - GUIDELINE ON ANTI SLAVERY AND ANTI HUMAN TRAFFICKING
14. HR/64 – GUIDELINE ON EQUAL EMPLOYMENT OPPORTUNITY, CHILD LABOUR, GENDER EQUALITY & PROTECTION OF HUMAN RIGHTS
15. HR/69 - GUIDELINE ON WHISTLEBLOWER
16. HR/70 – GUIDELINE ON CHILD LABOUR
17. HR/72 - GUIDELINE ON WAGE & SALARY DETERMINATION
18. HR/75 – GUIDELINE ON CONFIDENTIALITY OF EMPLOYEE PERSONAL DATA/INFORMATION
19. POLICY ON SUSTAINABLE PROCUREMENT
20. RESPONSIBLE SALES & MARKETING
21. RESPONSIBLE CARE POLICY
22. GFCL SUSTAINABILITY POLICY
23. CORPORATE INTEGRATED MANAGEMENT SYSTEM POLICY

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 GUJARAT FLUORO-CHEMICALS LIMITED An INOX Group Company	GUIDELINE ON PROTECTION OF HUMAN RIGHTS	Guideline No
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The above policies are available on our company website and the guidelines are uploaded on the EIS Portal.

5. HUMAN RIGHTS PROTECTION FRAMEWORK & COMPLIANCE

Any employee who learns of a potential violation of this guideline is required to report his or her suspicion promptly to the Company Ethics Committee. Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct shall be protected against retaliation. All grievances and complaints shall be taken seriously and treated with sensitivity and fairness. If confronted with such an incident for violation of this Policy, it must be immediately rejected and reported to the Company's Ethics Committee of the respective business comprising of the following incumbents:

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

The Company Secretary shall be the "Company Ethics Officer" and any three member of the above List and along with the Company Secretary shall form a quorum of the Ethics Committee. Similarly, if any employee or agent knows or believes that an improper gratification has been or shall be made, the employee or agent must also report such incident to the Ethics Committee. The Company's policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of the related laws or this Policy. The Social Accountability, Regulatory and Sustainability (SARS) Committee shall be responsible for taking actions related to human rights implementation.

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

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

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

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

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

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

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

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

5.1 COMPLIANCE:

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

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

6. OUR APPROACH:

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

a) In Our Operations

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

b) In the Supply Base

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

c) In the Community:

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

7. ADDRESSING BUSINESS & HUMAN RIGHTS IN OUR VALUE CHAIN

The Company upholds and ensure that across its complete value chain – from its vendors to the Customers, the following Human rights are protected, enhanced and included in the policy statement and in the procedure implemented –

a) Rights of Self Determination

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- b) Right to Life
- c) Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment
- d) Right not to be subjected to slavery, servitude or forced labour
- e) Right to Liberty and security of the person
- f) Right of detained persons to humane treatment
- g) Right not to be subjected to imprisonment for inability to fulfill a contract
- h) Right to freedom of movement
- i) Right of Aliens to due process when facing expulsion
- j) Right to a fair trial
- k) Right to be free from retroactive criminal view
- l) Right to Recognition as a person before the law
- m) Right to Privacy
- n) Right to Freedom of Thought, conscience and religion
- o) Right to Freedom of Opinion and Expression
- p) Right to Freedom from War Propaganda, and freedom from incitement to racial, religious or national hatred
- q) Right to Freedom of Assembly
- r) Right to Freedom of Association
- s) Right of Protection of the Family and Right to Marry
- t) Right of Protection for the Child
- u) Right to Participate in Public Life
- v) Right to Equality before the law, equal protection of the law, and rights of Non Discrimination
- w) Rights of Minorities
- x) Right to Work
- y) Right to enjoy just and favorable conditions of work

8. IMPLEMENTATION

GFCL and its subsidiaries are expected to follow our company guidelines to ensure respect for Human Rights. This is an integral part of other related policies, including the Code of Business Conduct. All our Stakeholders i.e. Employees, Suppliers, Vendors and Service Providers shall be required to sign a declaration, confirming their willingness and implement internal systems to comply with our Human Rights policy. Additionally, this policy shall be shared with the supplier/vendor/service providers while issuing/releasing purchase orders.

We expect our Suppliers, Vendors and Service Providers/Suppliers to set in place internal policies, governance structures, systems, processes and take any other relevant measures to ensure adherence with this Policy. We 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.

We regularly monitor, review and update the progress and publicly communicate the results. If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it to the Ethics Committee or the Ethics Line where we will review the concern and conduct an appropriate investigation.

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9. HUMAN RIGHTS IMPACT ASSESSMENT

The Company Shall methodically identify, evaluate and manage human rights risks and impacts through due diligence processes which include our own Operations as well as Supply Chain and Community. This is a continuous journey and will be executed by

1. conducting trainings to raise awareness on Human Rights;
2. engaging with suppliers, vendors and service providers through dialogues, audits and corrective action plan to reduce adverse human rights impact;
3. ensuring suppliers, vendors and service providers comply with our Code of Conduct and policy on Human Rights;
4. encouraging feedback from all our stakeholders who may be affected by our operations and offering remedy to the stakeholders who may be involved with us directly or indirectly;
5. Having a system of whistleblower in place for all our internal and external stakeholders to report any violation if any, and
6. Assessing and Monitoring our actions and reporting regularly on Human Rights

10. AWARENESS AND TRAINING

- i. To ensure that all directors, officers, employees, consultants, and contractors of the Company are aware of the human rights policy, a copy of the policy shall be provided to them and they shall be advised that the policy is available on the Company's website for their review. They shall also be informed whenever significant changes are made and a copy of this policy shall be provided to them and shall be educated about its importance.
- ii. Training on this policy shall form a part of the induction process for all Employees, Suppliers, Vendors and Service Providers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures, and government & public bodies (including their advisers, representatives and officials, politicians and political parties). All the existing employees and Suppliers, Vendors and Service Providers shall receive relevant training on how to implement and adhere to this policy.
- iii. At the time of joining, the organization shall conduct awareness programs on Social Accountability & Social Responsibility (covering Human Rights) for Employees, Contractors, Suppliers & Service Providers on regular basis as appropriate to their roles, the risks to which they are exposed, and any changing circumstances. The Company shall maintain the training calendar and training report as a part of its documented information

11. COMMUNICATION

The organization shall ensure internal and external communication between Functional Heads and various levels of employees regarding the processes of the management system and their effectiveness. Such communication related to the system shall include:

- i. What it will communicate.
- ii. When to communicate.
- iii. With whom to communicate.
- iv. How to communicate.
- v. Who communicates?
- vi. The languages in which to communicate.

This policy shall be shared with all the stakeholders – Employees, Contractors, Supplier/vendor and Service providers at the time of induction, issuing purchase orders etc.

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12. DUE DILIGENCE – MONITORING, MEASUREMENT, ANALYSIS, EVALUATION & COMPLIANCE:

GFL reserves the right to verify compliance with this policy through 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, and Employees and worker well-being surveys. Such audits may include Confidential Employee interviews, inspect Third parties/Suppliers, Vendors and Service Providers' facilities, operations, books and records, and supplier-provided housing. The Company has planned and implemented the monitoring, measurement, analysis, and improvement processes needed to evaluate the effectiveness of this policy. The Company shall retain the documented information like functional objective monitoring sheet, Management review, and internal audits as evidence. If non-compliances are observed, corrective actions shall be undertaken.

Breach of this Policy will not be tolerated and will be liable to be subjected to disciplinary action, which may extend up to suspension and dismissal from service. Employees and suppliers are expected to comply with this and all applicable company policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination or termination of contract.

If Suppliers, Vendors and Service Providers fail to implement the recommended corrective action plans, do not remedy any act of non-compliance in a timely manner, or there is breach of any term or condition of this privacy policy, whether intentional or unintentional, the company may, in its sole discretion and without any further obligation to Suppliers, Vendors and Service Providers, suspend purchases, refuse to take delivery under any purchase order and return any goods or services from the supplier until the corrective actions have been implemented, or may immediately terminate its business relationship/contract/employment with the Suppliers, Vendors and Service Providers/responsible employee in addition to any other rights or remedies available to the Company.

13. INTERNAL AUDIT

Internal Audits shall be performed regularly at least once in 6 months to assess the conformance to the policy. Unscheduled audits may be carried out at the discretion of the management or Company Ethics Officer based on the requirement.

The Ethics Committee shall be responsible for the planning and implementation of the audit. All the employees shall follow the Company's processes and adhere to the this policy.

The auditors, who are selected from within the company, shall however assist the responsible team. It shall be ensured that the auditors are independent of the specific activities or areas being audited by them and shall be provided for audit training. If the need arises, outside auditors can also be employed at the discretion of the Company Ethics Officer. Internal Auditors shall be responsible to execute audit as per plan and verify the effectiveness of the implementation of this policy.

The internal audit shall be scheduled in the Company based on the status and importance of the activity to be audited and the previous audit results. The Ethics Committee prepares the audit plan covering the scope, schedule, and other details. The audit plan shall be prepared and circulated before 1 week of audit execution to ensure the availability of respective personnel (Location HRs) and the auditors.

14. AUDIT REPORT AND FOLLOW- UP

The Auditor shall prepare a non-conformity report on completion of the audit and the non-conformity shall be brought to the notice of auditee. Audit findings shall be documented and used as the main formal means of resolving problems and deficiencies detected in the Management System.

The respective Location HRs shall close the non-conformity within a maximum of 45 days. The copies of such Non-Conformity reports shall be given to the auditee and after taking timely corrective action on Non-Conformity reports, it shall be verified to close the Non-Conformity. After verification of act ions taken; the audit findings shall be closed. During the next audit, the implementation and effectiveness of the corrective action taken on NCR's shall be reviewed and documented.

All the audit findings and verification of audit results shall be reported to the top management for the review and evaluation of the system and shall also be discussed in the management review meetings. The audit plan/schedule,

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audit nonconformity reports, and clause wise audit checklist shall be maintained as evidence of the implementation of the audit program and the audit result.

15. TOP MANAGEMENT REVIEW

The management reviews progress on the human rights implementation across the business, considers current and emerging human rights risks significance. The SARS Committee shall be responsible for implementing actions to help meet the commitments in this policy and all relevant group requirements. The review shall include implementation of this policy and objectives to identify any area, which requires improvement and evaluate the need for changes for the effective functioning of the system.

This review shall be carried out at least once in six months by the Ethics Committee by Company Ethics Officer by holding Management Review Meetings, which shall be attended by Ethics Committee Team members, and all the SARS Committee Members.

16. CONTINUAL IMPROVEMENT

This Policy shall be subject to periodic review through the company's human rights due diligence process. The Ethics Committee shall take the necessary action for continuous improvement in the suitability, adequacy, and effectiveness of the management system. The continual improvement of Sustainable Procurement management system shall be facilitated through the use of this policy, objectives, and audit results, analysis of data, corrective action and output of management review to determine need or opportunities which shall be identified as a part of continual improvement.

17. POWER TO AMEND:

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

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