



**GUIDELINE ON EQUAL EMPLOYMENT OPPORTUNITY, GENDER
EQUALITY, DIVERSITY, INCLUSION & PROTECTION OF MINORITY
RIGHTS**

Guideline No

HR/64

1. BACKGROUND:

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

2. PURPOSE:

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

3. POLICY FRAMEWORK:

We believe that a diverse workforce allows us to capitalize better on the growth opportunities available for us to match our growth ambitions and drive inclusion across the businesses. The Company prohibits any discrimination on the basis of gender or ethnicity in areas of hiring, pay and promotion where men and women perform work of similar skill, effort, and responsibility. However, there can be some affirmative action with respect to persons with abilities.

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

- a. The Company will take all actions to ensure that a conducive environment is provided to all employees to perform their role and excel in the same. No employee shall be discriminated against in the Company by any employee for any reason attributable to his/her physical abilities.
- b. All Employees are personally responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others. Disrespectful behavior includes, but not limited to, the following –
 - i. Insult, ridicule, swearing and shouting in personal interaction and common places, over the telephone.
 - ii. Aggressive gesture
 - iii. Abuse
 - iv. Threatening, including that of loss of employment, and intimidating – both verbal and non-verbal
 - v. Violent behavior like slamming the door, table banging, throwing objects, etc
 - vi. Bullying which includes, but not limited to, constant criticism at work, impossible deadlines, constantly changing targets and assignments, assigning meaningless work or no work,
 - vii. Rude, unpleasant, inappropriate, and unprofessional, impolite, discourteous behaviour that displays a lack of regard for others
 - viii. Behavior that causes hurt feelings and distresses, disturbs, and/or offends others
- c. Employment with the Company will be based on merit only regardless of caste, creed, gender, color, age, marital or veteran status, national origin, race, religion, or physical ability of a person or any other legally protected status and individual from minority groups. This shall be well communicated to all the applicants through email, job postings, or press advertisements.
- d. Promotional opportunities will be based on performance, ability and potential, and will be consistent with the needs of the business. There shall be no discrimination based on caste, creed, gender, color, age, marital or veteran status, national origin, race, religion, and individuals from minority groups.
- e. There shall be no recruitment of child labour. This means that any young person under 18 shall not be employed as per the ILO standard. The Company shall not allow any Contractor to engage in labour below the age of 18 years.
- f. The Company's Pay structure shall be based on "Equal Pay for Equal Work" and there shall be no discrimination based on caste, creed, gender, color, age, marital or veteran status, national origin, race, religion, and individuals from minority groups.

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4. WOMEN EMPOWERMENT & DIVERSITY

Women Empowerment Principles (WEPs) are fundamental means for corporate delivery on gender equality dimensions of the 2030 agenda and the UN Sustainable Development Goals. The Company is a WEP member striving to internalize the 7 Women Empowerment Principles in the areas of gender equality, diversity, human rights, health and safety, training and development, and community involvement within the company strategies, policies, and operations. Through this, the company aims to advance the broader development goals of the United Nations particularly the 17 Sustainable Development Goals (SDGs).



Women Empowerment Principles (WEPs)

4.1 OUR APPROACH -

The Company by signing the CEO Statement of Support and joining the WEPs network indicates a commitment to this agenda and to promoting business practices that empower women. These include equal pay for work of equal value, gender responsive supply chain practices, and zero-tolerance against sexual harassment in the workplace. The Company signed the WEPs CEO Statement and is ready to step into the WEPs continuous journey of 6 main steps:

- 1) **CONSIDER** – The Company gained awareness of the WEPs and gathered senior management support for signing on to the WEPs.
- 2) **SIGN** - Signing the WEPs is an important milestone in the WEPs implementation journey. We signed the UN Women Empowerment Principles. The CEO Statement can be viewed using the link - [Gujarat Fluorochemicals Limited | WEPs](#)
- 3) **ACTIVATE** - After the CEO Statement of Support is signed off, is to develop an action plan with KPIs. The Company supports and respects human rights being a UNGC signatory and adhering to 10 Principles and adopting the 'Protect, Respect & Remedy Framework'. The company shall carry out Human Rights Impact Assessment across locations by an external agency to review its implemented processes for taking corrective actions for continual improvement every year. The Company has an established Women Empowerment & Diversity Committee in place to review the progress made on WEPs regularly.
- 4) **ENGAGE** - Being a member of the WEP community, the company has the opportunity to engage with its employees, customers, communities, and business service providers to ensure a gender-inclusive environment. The company shall impart an awareness training program on 'Gender Sensitivity' to its employees. This is mandatory for all the employees to undergo this training. Furthermore, the company shall engage in continuous dialogue with the Community and Local Stakeholders to identify any negative human rights impact and a remediation plan by way of comprehensive social responsibility. The Company also conducts awareness campaign on International Women's Day every year to celebrate women's achievements, encourage everyone to develop an understanding of gender bias, and reinforce a commitment to gender equality today for a sustainable tomorrow.

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- 5) **SUSTAIN** - The next step in the WEP implementation journey is to collect gender disaggregated data and communicate the progress. The Company shall report its progress and experiences as a UNGC COP and have been reporting since 2018 on the platform. The Company shall also publish Social Accountability & Human Rights Progress Report annually to share the progress made over the last year and details of the efforts we made so far in embedding human rights in our business.
- 6) **REPORT** - As mentioned in point 5 – Sustain, the company shall report the progress as a public disclosure document. The Company has been reporting progress over the last 6 years.

4.2 GOVERNANCE STRUCTURE & REVIEW MECHANISM:

The Company recognizes Women Empowerment & Diversity as an integral part of its people strategy which shall benefit not only an individual but also the society at large, contributing to economic and social development. For this, the Top Management has constituted a 'Corporate Women Empowerment & Diversity Committee' and 'Internal Complaints Committee' responsible for providing strategic direction for taking required actions on the WEPs, investigating, observing, and monitoring social accountability, and human rights issues such as discrimination; harassment, torture, violence, etc., across the Organization. Each location has a WEP Committee member representing the location. The composition of the Women Empowerment & Diversity Committee is detailed in the Annexure I.

The Committee shall review the activities on monthly basis and publishes a Monthly Sustainability and Social Accountability Dashboard. The points as raised by the local representatives in respect of the 7 WEPs as laid down by the UN are discussed and action are taken forward. The Corporate Women Empowerment and Diversity Committee shall report to the Social Accountability and Responsibility Corporate Committee (SARCC) of the Company. SARCC is chaired by the CEO of the Company. This meeting shall be held once in every month and the matter discussed in the WED Committee shall be put forward to the SARCC. The SARCC reviews the progress made on Social Accountability and Responsibility aspects on bi-monthly basis.

5. TRAINING:

The Company shall provide training to all employees on annual basis regarding the advancement of gender equality, giving equal employment opportunity, maintaining diversity and the empowerment of women, fostering a collective understanding of shared values and promoting adherence to company policies and practices. All the Women Empowerment & Diversity Committee (WEDC) members shall be trained on annual basis to develop the capacities of its members to better comprehend and implement WEPs as an enabling tool towards achieving gender equality in the organization and beyond.

6. GRIEVANCE REDRESSAL

The Company shall not tolerate harassment and behaviour that is discriminatory or behaviours that victimizes any individual or group in our workplaces based on any criteria of caste, creed, gender, color, age, marital or veteran status, national origin, race, religion, or physical ability of a person or any other legally protected status. Appropriate action basis investigation will be taken if any employee is found breaching this policy either through discrimination, harassment, bullying or victimizing other employees or by making false claims.

- 6.1 Any employee who learns of a potential violation of this guideline is required to report his or her suspicion promptly to the any member of the Company Ethics Committee directly or through the digital platform available on the Employee portal – 'Ethics Line'. An employee can also send an email to the helpline – ethicsline@gfl.co.in .

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

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The Company Secretary shall be the “Company Ethics Officer” and any three members of the above List and along with the Company Secretary shall form a quorum of the Ethics Committee. Similarly, if any employee or agent knows or believes that an improper gratification has been or shall be made, the employee or agent must also report such incident to the Ethics Committee. The Company’s policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of the applicable laws or this Policy.

The Company shall offer multiple mandatory trainings through various forums and workshops to its suppliers and employees responsible specifically for identifying such issues in the company and responding 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.

- 6.2 The Company Secretary shall be the “Company Ethics Officer” and any three members of the above List and along with the Company Secretary shall form a quorum of the Ethics Committee. The Company’s policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of anti-corruption laws or this Policy.
- 6.3 Any employee (full-time, part-time or employees appointed on an ad-hoc/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.
- 6.4 The reporting of such incidents 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 transactions 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.
- 6.5 Reports can be made in confidence and the person to whom the incident has been reported must maintain confidentiality with respect to the reporter and such matters should under no circumstances be discussed with any unauthorized person.
- 6.6 Member of the Ethics Committee receiving input about any such incident / nodal officer(s) shall ensure that all relevant records, documents and other evidence is being immediately taken into custody and being protected from being tampered with, destroyed or removed by suspected perpetrators of forced labour or by any other official under his influence.
- 6.7 The Ethics Committee conduct preliminary verification of any suspected activity and conducts an appropriate investigation. Such an investigation can be vested to any other person or committee as the Ethics Committee deems fit.
- 6.8 After completion of the investigation, due & appropriate action, which could include administrative action, disciplinary action, civil or criminal action or closure of the matter if it is proved that discrimination is not practiced etc. depending upon the outcome of the investigation, shall be undertaken.

7. BREACH OF THIS POLICY

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

8. POWER TO AMEND:

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

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Annexure I –**Annexure I - WOMEN EMPOWERMENT & DIVERSITY COMMITTEE (WEDC)**

S. No.	Name	Designation	Position	Location
1	Ms. Jyoti Duggal	Manager	Chairperson	Noida
2	Ms. Sunita Gami	General Manager	Co-Chairperson	Ranjitnagar
3	Ms. Mira Sharma	Deputy Manager	Secretary	Dahej A
4	Ms. Priya Kumari	Manager	Member	Vadodara
5	Ms. Koyal Trivedi Dhingra	Senior Manager	Member	Noida
6	Ms. Dimple Mahida	Engineer	Member	Dahej B
7	Ms. Rupal Patel	Assistant Manager	Member	Ranjitnagar
8	Ms. Vaibhavi Parmar	Officer	Women Empowerment Facilitator in Community	Ranjitnagar
9	Ms. Smruti Bhatnagar	Office Coordinator	Member	Europe
10	Ms. Laura Shekleton	Director – Supply Chain & Finance	Member	United States
11	Mr. Subodh Gautam	Head – Social Accountability & Special Projects – HR	Action Facilitator	Vadodara
12	Mr. Kallol Chakraborty	Head – Group Corporate Human Resources	Chief Sponsor	Noida