

BAJEL PROJECTS LIMITED

Human Rights Policy

I. Philosophy

At Bajel Projects Limited ("BPL" or "**Company**"), we believe in creating a workplace that promotes diversity, inclusion with high performance. Our commitment to this philosophy is reflected in our policies which ensure diversity and non-discrimination across the organization.

We are committed to sourcing products and services of superior quality and value from international and Indian manufacturers and suppliers of repute. We expect our business partners to establish a human rights compliant business environment and to monitor progress on human rights performance.

At BPL, we value our employees as important stakeholders in the enterprise and strive to build a culture of mutual trust, respect, interdependence, and meaningful engagement. This approach helps us to build, strengthen, and sustain harmonious employee relations across the organization. Finally, we maintain a "No Child Labour and No Forced Labour" policy to ensure that our products and services are produced in a fair and ethical manner.

II. Objectives

The objective of this policy is to establish a human rights compliant business environment and ensure prevention of child labour and forced labour, any discrimination, freedom of association and provide a safe and healthy work environment. Additionally, we aim to spread awareness among our employees about these issues and the consequences of violating this policy. Furthermore, we provide clear guidelines and mechanisms to effectively address any incidents of violation, should they occur.

III. Applicability of the policy

The Policy aims to promote the awareness and realization of the principles outlined in this Policy among all the Company's internal stakeholders including but not limited to employees and workers. This will involve regular communication and engagement with internal stakeholders & to educate them on the Policy's principles. The Company recognizes that achieving the objectives of this Policy will require a collective effort, and it is committed to working collaboratively with all its internal stakeholders towards this end.

IV. Policy Principles

It is BPL's policy:

Towards 'Human Rights Consideration of Stakeholders Beyond the Workplace':

- a. To play a positive role in building awareness on human rights for its key stakeholders.
- b. To encourage respect for human rights of the local communities with specific focus on vulnerable and marginalised groups.
- c. To discourage human rights abuses by such parties.
- d. To encourage establishment of a formal grievance redressal mechanism for the impacted stakeholders

Towards 'Diversity and Equal Opportunity':

- e. To promote diversity and offer equal opportunity to all employees based on merit and ability.
- f. To hire and promote employees on the basis of their qualification, performance and ability.
- g. To provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment.
- h. To ensure that there is no discrimination amongst its employees in compensation, training and employee benefits, based on caste, religion, disability, gender, sexual orientation, race, colour, ancestry, marital status or affiliation with a political, religious or union organisation or majority/minority group.
- i. To ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis, to promote employee morale and also to facilitate career development through enlightened human resource interventions.
- j. To make reasonable accommodation*, whenever necessary, for qualified employees or job applicants who have disabilities.
**Reasonable accommodation means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure the enjoyment or exercise of rights by persons with disabilities, equally with others.*

Towards 'Prohibition of Child Labour and Prevention of Forced Labour at the Workplace':

- k. To ensure that no person below the age of eighteen years is employed in the workplace.
- l. To respect the human right to freedom and dignity, and to strictly prohibit the use of forced or compulsory labour at all its units and remain committed to refraining from any activity that may encourage or support human trafficking.
- m. To ensure that no employee is made to work against his/her will or to work as bonded/forced labour or subjected to corporal punishment or coercion of any kind, related to work.
- n. To refrain from engaging with vendors and suppliers who resort to using child labour and forced labour in their operations.

Towards 'Freedom of Association':

- o. To respect the dignity of the individual and the freedom of employees to lawfully organise themselves into interest groups, independent of supervision by the management.
- p. To ensure that employees are not discriminated against for exercising this freedom in a lawful manner and consistent with BPL's core values.

Towards 'Providing a safe and healthy workplace for all individuals within our Company and engaged in business activities under our supervision.':

- q. To place a high value on the safety and health of all employees, contractors, and visitors and to remain committed to providing a safe working environment and preventing harm to any individual or business partner, including public health.
- r. To encourage all individuals within the Company to share the responsibility for ensuring safety and take an active role in preventing harm to themselves and others.
- s. To not tolerate any at-risk activity at any level of its operations and adheres to all applicable national regulatory requirements in the countries in which it operates.

V. Promotion to value chain partners

The Policy also aims to promote the awareness and realization of the principles outlined in this Policy among all of the Company's value chain partners, including but not limited to suppliers, contractors, distributors, and other partners. The Company shall establish, maintain and periodically review systems to require value chain partners to provide a self-declaration of compliance with this Policy, and provide periodic reports on any possible violations of this Policy. The Company is committed to encouraging the adoption of these principles by its value chain partners to ensure that the entire supply chain is aligned with this Policy. This will involve regular communication and engagement with these partners to educate them on the Policy's principles and to encourage their compliance. The Company recognizes that achieving the objectives of this Policy will require a collective effort, and it is committed to working collaboratively with all its value chain partners towards this end.

VI. Violation and disciplinary action

- a. To address potential violations of the policy principles, individuals are encouraged to report concerns to 'Compliance Committee' constituted under the Company's Code of Conduct for Employees ("COC Committee"), through a formal complaint at coc@bajelprojects.com. Before reporting such events, the person reporting must be reasonably sure that a violation has actually occurred.
- b. Any complaints or concerns received by the COC Committee that are deemed outside of its purview shall be referred to the appropriate committee for review and inclusion in the relevant policy.
- c. The COC Committee shall strive to decide the case and recommend action within four (4) weeks to the Managing Director (MD)
- d. Any grievance against any member of the COC Committee should be addressed to the MD.
- e. The Company shall ensure the confidentiality of complaints and ensure that the privacy of the complainants is safeguarded.

VII. Implementation and monitoring

- a. The responsibility for the implementation of this Policy rests with the HR Department of the Company. The HR Department shall also uphold the principles outlined in the National Guidelines on Responsible Business Conduct (NGRBC) in all business contexts that fall under their direct or indirect control. HR Department will also be responsible for reviewing and recommending updating to the Policy and for providing guidance and support.
- b. The Policy should be communicated to all employees through induction program, policy manuals and Company intra-net portal. Special training programs to be planned for the staff so that they are aware of the Policy, and they are able to support implementation of the same and prevent any violations.
- c. The HR Department shall prepare and submit a compliance report to the Board of Directors at such intervals as may be decided by the MD, but no later than once a year. The compliance report shall, at a minimum, include such reporting particulars/indicators as specified by the Securities and Exchange Board of India (SEBI) for the Business Responsibility and Sustainability Reporting (BRSR). The HR Department shall ensure that the compliance report is accurate, complete, and in compliance with the requirements of this Policy.

VIII. Governance

This Policy is approved by the Board of Directors of the Company. The Policy is also disclosed on the website of the Company for information and reference of all relevant stakeholders.

The MD of the Company, through the members of the COC Committee, shall monitor implementation of and compliance with the Policy and with statutory provisions, and, as far as possible, draw out policies, processes, SOPs, instruction manuals. The MD will authorise such officials as may be required, define measurable key performance indicators and targets to monitor performance. Compliance with this Policy will be monitored and evaluated by the Board or any committee thereof.

Any grievances in respect of this Policy should be addressed to the Company Secretary & Chief Human Resources Officer (CHRO) of the Company, whose contact details made available on the website of the Company.

IX. Frequency of review of policy

The policy shall be reviewed on an annual basis (or any frequency as it may deem fit) to maintain the efficacy of the engagement with our internal and external stakeholders.

X. Track of versions

Edition	Version	Main Changes
1	1.0	New Document