

Human Rights Policy

[Effective 01st March, 2023]

Ador Welding Limited

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<u>Index</u>

Background	3
Scope and applicability	3
Regulatory compliance	
luman rights aspects	
Child labour and forced labour	
Diversity, equal opportunity, and non-discrimination	
Freedom of association and collective bargaining	
Environment, Health and Safety	
Wages, working hours and leave benefits	
Recruitment	
Data privacy	4
Community engagement	4
Workplace security	4
Grievance mechanism	5
Policy implementation	5



Background

Ador believes in respecting and upholding human rights. This Human Rights Policy (Policy) is by reference made part of the Ador Code of Conduct (CoC), which imbibes the spirit of human rights in our operations and value chain, across the world.

At Ador we are committed to protect the fundamental human rights and have actualized the principles in letter and spirit enshrined in the Universal Declaration of Human Rights and United Nations Guiding Principles (UNGP) on Business and Human Rights, which include processes for respecting, protecting, and remediating human rights issues. In addition, this policy is also aligned with the fundamental conventions identified by the International Labour Organization (ILO) and principles of National Guidelines on Responsible Business Conduct (NGRBC) of the Ministry of Corporate Affairs, India.

Scope and applicability

This policy is applicable to all our stakeholders, including employees & / or workers, ("on Roll" as well as "off Roll") consultants and trainees of Ador and its subsidiaries; as well as business partners (suppliers, contractors, distributors, joint venture partners, channel partners), to uphold and observe these values and abide by the principles outlined in the Policy.

The Policy is applicable from 01st April, 2023.

This Policy may be reviewed, as & when required and the Managing Director (MD) is authorized to amend the Policy to give effect to any changes/amendments, as maybe required from time to time.

Regulatory compliance

We respect and generally comply with all applicable laws and regulations in all geographical territories of our operations, which also include the national labour regulations, as applicable to human rights aspects.

Human rights aspects

Child Labour and forced Labour

We shall not employ any forced labour or child labour in any of our operations. We ensure adherence to minimum working age requirements, prescribed by local regulations and prohibit employment of child labour across our operations and value chain. We respect the right of all workers to enter and leave employment voluntarily and do not engage in compulsory, forced, indentured or bonded labour.

Diversity, equal opportunity and non-discrimination

We ensure that our employees and workers are treated with dignity, respect, and fairness, and are not subject to harassment, discrimination, forced labour or inhumane treatment at the time of hiring, providing compensation, imparting training, promotion, termination or retirement on account of gender, sex, sexual orientation, race, religion, caste, ethnicity, nationality, age, disability, health condition / diseases, birth, family responsibilities, marital status, political opinions, etc. We are committed to have a working culture that is free from any prejudice, bias, physical or mental harassment. Ador has a zero-tolerance approach,

ADOR WELDING LIMITED



towards discrimination across our operations and value chain.

We ensure zero-tolerance towards any act of sexual harassment. A proper and fair investigation (with an opportunity to be heard) is followed and strict action is undertaken as per Ador's Policy on Prevention of Sexual Harassment at Workplace.

Freedom of association and collective bargaining

We respect the rights of our workers. Our workers are free to join any association without any negative consequences, or retaliation from the organization. We actively work with workers to discuss concerns, if any, particularly on the health and safety of our workers, notice period, salaries, etc.

Environment, Health and Safety (EHS)

We are committed to protect the safety, health and well-being of our stakeholders through EHS management systems and safety requirements for our value chain partners. We pursue sustainable business practices and work towards continuous improvement in our EHS performance, year-on-year. We record and investigate all incidents, and accordingly train our employees and workers on workplace-related safety hazards, associated risks and measures, required to mitigate these risks.

Wages, working hours and leave benefits

We believe that providing a flexible work culture helps us retain talent and keeps our employees motivated & engaged. Accordingly, we ensure the right to fair compensation and generally comply with all applicable laws related to payment of wages, working hours and overtime compensation. The various leave benefits, we provide to our employees, include paternity leave, maternity leave, casual leave, sick leave, Special Occasion Leave and privilege leave are benevolent.

Recruitment

We have implemented merit-based processes in recruitment, compensation, training, and promotions. We do not support any fraudulent methods of recruitment, and all the terms & conditions of employment are clearly communicated.

Data privacy

We respect the privacy of all our employees and business partners, by taking measures that are prescribed by law, to protect and secure personal data. We do not disclose anyone's personal, medical and financial information, unless legally required / mandated.

Community engagement

We are committed to engaging with local communities in a manner that respect the rights and dignity of all people in the geographies we operate in, and otherwise take steps to prevent, reduce and mitigate impact on communities due to our business operations. We continue to support several community welfare, health and educational activities, essentially in communities surrounding the Company's factories, both directly and through trusts, by providing healthcare, education, improvement of community infrastructure etc. We also respect the rights of people, and ensure all communities are part of our welfare and engagement programs.



Workplace security

We are committed to maintaining a safe work environment that is free from violence, harassment, intimidation and other unsafe or disruptive conditions, caused due to internal and external threats. Adequate security arrangements for employees are provided, as needed and are maintained with respect to employee privacy & dignity, in accordance with the guidelines on Security and Human Rights.

Awareness programme and due diligence

The Company shall run a Human Rights awareness programme / trainings on a regular basis, to educate employees/workers on their rights. Our employees/workers must also take equal responsibility to be aware about this policy and their rights, by attending, reading, and participating in all trainings on this matter. The Company shall also undertake due diligence on Human Rights, whenever required, to identify, prevent and mitigate adverse human rights issues.

Grievance mechanism

In line with the expectations articulated in the UN Guiding Principles on Business and Human Rights, we provide a grievance channel for our stakeholders, set up under our Whistle Blower Policy. Any concern, as under this policy can be reported directly to the chairperson of the Audit Committee. Our Audit Committee investigates whistle blower complaints, addresses any violation, wrongdoing or non-compliance, and ensures thorough investigation, within the timelines, prescribed under the Whistle Blower Policy.

Policy implementation

We are committed to solving genuine concerns of our stakeholders and business partners. They can report their concerns to the chairperson of the Audit Committee or to the Managing Director. We do not tolerate retaliation against any employee who files a non-compliance incident report. Each report is investigated, and appropriate remediation measures are taken to prevent further wrongdoing, penalise aberrations in the past, to the extent such acts are determined, in the inquiry, to be in the nature of misconduct.