AGI INFRA LIMITED

Human Rights Policy

I. Introduction

This document defines the “Human Rights Policy” of Godfrey Phillips India Limited and (hereinafter referred to as “AGIIL” or “the Company”). Human Rights is the value that AGIIL as a Company is fully committed to and have been continuously making ongoing efforts to go above and beyond its commitments.

This Policy is drafted in accordance with principles of National Guidelines on Responsible Business Conduct (NGRBC) of the Ministry of Corporate Affairs, Government of India and upholds human rights as established in internationally recognized standards and guidelines like UN Universal Declaration of Human Rights, UN Guiding Principles on Business & Human Rights and International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

II. Scope

The scope of this Policy is for AGIIL and their employees. AGIIL also encourages its suppliers, contractors and business partners to comply with the same.

“Employee” here includes all types of people working with the Company. In addition, any individual operating out of Company’s premises, such as permanent employee, contractual employee, vendor manpower, workers, interns/trainee, etc.

III. Community and Stakeholder Engagement

AGIIL believes in sustainable business growth and understands its responsibility to promote social wellbeing. It engages with the community members around the area of its operation on human rights issues like forced labour and child labour, etc. It believes that local issues are better handled at the local level and thus it continues to engage with the local members to understand their issues and their views on the pertinent matters as they conduct the business.

IV. Promoting Environment Free from Bullying and Harassment

AGIIL’s Code of Business Conduct and Prevention of Sexual Harassment Policy is applicable to every person who works within the Company’s premises/area of operations. The Policy has clear provisions against causing harassment to any employee working at any of the Company’s workplace or premise.

Harassment is any form of behaviour that is unwelcome, unsolicited, unreciprocated and undesired. It is the behaviour that has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, and in the perception of the recipient of the conduct, it shall reasonably be considered as having that purpose or effect.

For harassment to happen, the impact of the person's action on the person who is receiving it, together with the nature of the behaviour would determine whether it is harassment or not, and not the intention per se.

V. Sexual Harassment

AGIIL is fully committed at preventing any form of sexual harassment at the workplace. It has Prevention of Sexual Harassment Policy (POSH) in place which clearly prohibits any such action and states the implication of exhibiting, displaying or participating in it. This policy also outlines the actions to be followed when its violation takes place and redressal mechanism is available for the complainant/victim.

Also, it obligates all its employees to undergo POSH training followed by an assessment periodically.

VI. Freedom of Association

AGIIL respects the right of employees to exercise their lawful right of free association, participation, collective bargaining and provide access to appropriate grievance redressal mechanisms. Its employees represent people from diverse background affinities, and skills to facilitate community participation, networking, cultural enrichment and support, based on gender, affinity, ability and orientation.

AGIIL has various programs and initiatives such as, peer-to-peer chat groups, leadership talks, conferences, and special events, to ensure assimilation and engagement of the diverse groups and communities within the large compliance workforce.

VII. Modern Slavery

AGIIL is committed to eradicating modern slavery of all types and forms and exhibits zero tolerance towards it.

VIII. Diversity and Inclusion

AGIIL believes that Diversity and Inclusion (D&I) at workplace is intrinsic for the growth of an organization by bringing in unique experience and perspective on board. It strives to promote a diverse workforce across all levels. Towards this, it also ensures that all the policies and practices are compliant and aligned to all applicable laws and regulations specific to D&I.

The Company is dedicated to creating a fair and transparent work environment with mutual respect for all. Company strives to ensure that all its workplace is free from any type of discrimination or harassment on the basis of gender, marital status, national or social origin, ethnicity, caste, religion or religious beliefs, age, disability, orientation, political opinion or any other status protected by applicable law and that meritocracy will be valued over anything else. The basis for recruitment, hiring, placement, development, training, remuneration, wages and compensation, and advancement at the Company is qualifications, performance, skills, potential, desired behaviour and experience and will be equal for all.

IX. Managerial Authority Abuse

Managerial authority abuse means conduct of a manager towards the employee who reports to him/her and over whom he/she has supervisory/oversight authority and which conduct:

- humiliates, intimidates, or undermines their dignity; or
- makes demands that are unreasonable and/or outside employee's role; or
- excessively scrutinizes the work to deliberately cause problem to the employee; or
- forcefully asks the employee to do a task which violates the AGIIL's Code of Conduct or any other applicable policy.

X. Conducive Work Culture

AGIIL's believes that providing a conducive work culture at the workplace is important to retain talent and to keep them motivated and engaged throughout. Pursuant of this, the Company provides a number of benefits to its employees such as medical support, supporting childcare needs of new mother, education assistance, loans, insurance coverage, etc.

XI. Promoting Employee Morale, Skill Upgradation and Career Development

AGIIL believes in promoting upskilling of its employees and thus, provides several learning opportunities to its employees. The learning input it offers spans across technology, domain-expertise, business, process, behaviour and leadership development.

The training programs support the overall development of its employees within and outside the Company.

XII. Workplace Security

AGIIL is committed to maintaining and promoting a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

XIII. Safe and Healthy Workplace

AGIIL believes in having a workplace free from any type of hazard and continually strives to provide safe and healthy workplace to everyone working in its premises and protects assets and information from and during a disruption.

AGIIL has a dedicated Health and Safety Policy that outlines the actions to be taken to avoid the occurrence of hazard and actions to be taken at the time of an emergency. To raise awareness amongst the people, dedicated system is in place to communicate information, instructions and training programs to enable the people to comply with the Health and Safety Policy of the Company.

XIV. Wages, Workhours and Benefits

AGIIL ensures that it complies with all applicable labour laws and practices including compliance with applicable wages, workhours, overtime and relevant social benefit laws.

XV. Data Privacy

AGIIL has a dedicated Data Privacy and Protection Policy which is formulated in accordance with the relevant laws, regulations and guidelines applicable to the Company. AGIIL is committed to protect the data of all its employees, customers and associates. Additionally, it is committed to ensure that no unauthorized access to any sensitive data takes place.

XVI. Human Dignity

AGIIL is committed to promoting individual dignity and condemns any action that lowers dignity and respect of the people. Promoting "Dignity of the Individual" is one of the core values of AGIIL and it strictly follows it and upholds the right to express disagreement and respect the time and efforts of others.

XVII. Communication

All its employees are communicated about the organizational policies, finances and long-term growth aspirations of the Company. They are also made aware of the applicable laws, guidelines and policies at the time of the joining of the organization and given periodic updates during their time in the employment.

XVIII. Child Labour

AGIIL prohibits child labour, forced or compulsory labour including bonded labour, slavery, and human trafficking in its business operation and endeavours to encourage its supply chain like suppliers, business partners, contractors, etc. to do the same. Company's Code of Conduct and Suppliers Code of Conduct also embodies the same principle that the Company strives to follow in letter and spirit. Company prohibits the hiring of individuals that are under 18 years of age.

XIX. Grievance Mechanism

Company has a dedicated Grievance Redressal Policy and Whistleblower Policy which may also be used by its supply chain or external stakeholder to addresses any incident of the human rights violation. An aggrieved person can place the complaint following the detailed procedure mentioned in the said policy. This policy also lays down the detailed procedure to be followed by the investigative officers to redress the grievance in the timely manner.

XX. Assessing Human Rights Risk

Human rights related risks may arise both from direct operations of the Company and indirect business activities of the vendors, contractors or business partners of the AGIIL. Therefore, it strives to monitor,

evaluate and review actual or potential Human Rights risk across its workplace and premises and mitigate the risks. It encourages its supply chain and associated business partners to comply with the Company's policies on the same.

In order to sensitize its supply chain partners on Human Rights issues and encourage them to mitigate the same, Company has drafted and enacted Suppliers Code of Conduct which includes the provision on human rights, and it encourages all its suppliers to uphold the Suppliers Code of Conduct.

XXI. Communication of the Policy

The Policy will be available on relevant medium of communication like intranet and corporate website www.agiinfra.com

XXII. Review

The Policy shall be reviewed by the Head of Human Resources annually or in compliance with the applicable laws, rules and regulation made thereunder.