

Paradeep Phosphate Ltd is committed to the principles of sustainable development including protecting and respecting human dignity. We believe that protecting Human Rights is an integral part of conducting business. We are committed to respecting the human rights of our workforce, communities and all those lives we touch, directly or indirectly, by our operations and by our product and services.

We are committed to identifying, assessing and minimising potential adverse impacts through due diligence and management of issues, and resolving grievances for affected stakeholders effectively. The Company is committed to uphold the spirit of human rights, as enshrined in the Constitution and in conformance to the international standards.

We will strive to:

- Be an equal opportunity employer and treat all employees with respect and dignity and judge solely on their performance irrespective of their race, religious creed, colour, national origin or ancestry, physical or mental disability, medical condition, marital status, age, gender;
- Promote fair working conditions and uphold human rights aligned with national regulations and international expectations and conventions;
- Be compliant with labour laws of the country in which we operate and ensure that our employees and business partners (contractors) are fairly and reasonably paid and remuneration structure is compliant with statutory obligations of the jurisdictions in which we operate;
- Include human rights-related requirements within contractual arrangements with business partners and host governments and carry out due diligence for tier 1 business partners;
- Include human rights due diligence into relevant business processes and before undertaking new acquisitions, activities or contractual engagements and all aspects of regular business operations;
- Conduct periodic human rights due diligence in business operations and implement corrective actions;
- In line with our unflinching commitment to good labour practices, we ensure that no person below the age of eighteen years is employed by Paradeep Phosphate Ltd in all our units. We do not engage with vendors and suppliers who use child and/or forced labour. Have zero tolerance for any form of forced, compulsory, trafficked and child labor or anyone held in slavery or servitude either directly or through our business partners;
- Recognize and respect employee rights to associate freely and to collective bargaining, as appropriately directed by law;
- Provide robust grievance mechanism for internal and external stakeholder to address issues of human right violation in operations;
- Measuring & performing on a periodic basis to ensure ongoing management of human rights including the sharing of good practices throughout the organization.

1.1 Complaint Management

All complaints related to Human Rights violation should be reported to the following officials:

→ Manufacturing Units: Welfare Officer

→ Corporate, Sales & Marketing Head Office and Branches/Establishment which are deemed to be an Establishment under the Labour Law: Sales HR Head

The complaints received pertaining to violation of Human Rights by the above officers will be sent to a committee as shown below:

- → Manufacturing Units:
 - Chairman Unit Head
 - Member Unit Finance Head
 - Member/Secretary Unit HR Head
- → Corporate, Sales & Marketing Head Office and Branches/Establishments which are deemed to be an Establishment under the Labour Law:
 - Chairman Sales & Marketing Head
 - Member Respective Regional Manager (only for complaints pertaining to Branches/Establishments)
 - Member/Secretary Sales HR Head

All complaints received by the respective officers mentioned above shall be placed before the above committee for evaluation/enquiry. The committee after necessary evaluation/investigation will recommend appropriate corrective action to the respective Business Units for implementation.

1.2 Review & Monitoring

The Member Secretary will send a quarterly report on the Human Rights violation complaints and the action taken against such violation to the Chief Human Resources Officer and Managing Director on a half yearly basis.

The Company will periodically review the policy, its implementation and effectiveness.

1.3 Communication of the Policy, Reporting & Implementation:

This policy is required to be displayed on the portal accessible to all employees and also communicated widely to all employees in a manner as deemed necessary including on the Notice Board. Human Resource Department along with the Functional Heads of the Company are responsible for ensuring that the policy is implemented throughout the Company.

This version is approved by MD&CEO, PPL