

22.0 Environment, Social & Governance
P22.7 Human Right Policy
Vardhman Group

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22.7.1. Objective

The objective of the policy is to respect and protect human rights and to provide a safe and healthy working environment for all employees and stakeholders.

22.7.2. Scope & Applicability

This policy applies to all categories of employees of Vardhman Group including workmen, contractual workmen, sub-staff & above employees, interns, and retainers.

Additionally, this policy extends its coverage to the stakeholders including suppliers, partners, contractors, and other affiliated parties who are part of the Vardhman Group value chain.

22.7.3. Protection of Human Rights

1. The Company recognizes its responsibility of treating all employees and stakeholders with dignity, respect, and rights. The protection of human rights and fundamental freedom of citizens is guaranteed under the Constitution of India.
2. The Company must abide by the constitution of India which provides every Indian Citizen:
 - Justice, Social, Economic, and Political Rights.
 - Liberty of thought, expression, belief, faith, and worship
 - Equality of status and opportunity and assuring the dignity of an individual
 - Fundamental Rights
 - Our Policy aligns with the United Nations Declarations of Human Rights and the International Labour Organization's Principles.
3. The Company prohibits discrimination in the matter of compensation, training, opportunities and employee benefits on the basis of caste, creed, religion, language, ethnicity, disability, age, gender, sexual orientation, race, colour, marital status, or union organization or any other status protected by appropriate laws.
4. The Company are supposed to act in certain ways or to refrain from certain acts, in order to promote and protect human rights, whether they are civil and political rights, such as the right to life, equality before the law, and freedom of expression; economic, social and cultural rights, such as the rights to work, social security and education, or collective rights, such as the rights to development and self-determination.
5. We are bound to comply with the "Protection of Human Rights Act, 1993" which provides for the constitution of the National Human Rights Commission for better protection of Human Rights.

22.7.4. Preventive Commitments

The company commits to respecting and preventing violations of human rights, including but not limited to:

- Prohibition of Child Labour, Forced Labour, Slavery, or any form of Human trafficking
- Freedom of Association
- Right to Collective Bargaining
- Equal and Fair Remuneration
- Safe and Healthy Workplace
- Discrimination on any grounds

22.7.5. Due Diligence & Risk Mitigation

- A structured due diligence process is established to identify and assess potential impacts and risks relating to human rights across operations and the supply chain.
- Processes are implemented to mitigate identified human rights risks proactively.

22.7.6. Training & Awareness

- Vardhman mandates company-wide training programs on human rights issues to enhance awareness among employees, suppliers, and partners.
- Periodic assessments and refresher sessions are conducted by the Unit HR/L& D Team to ensure alignment with current & ongoing standards.

22.7.7. Supplier & Partner Requirement

- Suppliers and partners must comply with Vardhman Group's Human Rights policy and applicable laws.
- The company reserves the right to terminate relationships with suppliers and partners found violating human rights.

22.7.8. Grievance Redressal Mechanism

A formal grievance/complaint mechanism is in place to address concerns related to human rights violations. All grievances are handled confidentially and impartially. Employees may report human rights violations to the committee constituted by the management. The mechanism is as follows:

22.7.8.1. Grievance Committee Formation

- A Grievance Committee has been constituted by the management, consisting of representatives from HR, legal, and neutral employees from diverse departments to ensure impartiality.
- The Grievance Committee has a Liaison Officer as well, particularly for grievances related to employees with disabilities.

22.7.8.2. Grievance Committee Members

##	Designation	Name	Department	Role
1	Chairperson	Displayed in respective Units	Human Resources	The HR representative will lead the committee, ensure adherence to policies, and facilitate the grievance process.
2	Senior Management Representative		e.g., Operations, Finance, etc.	To offer senior leadership insights and ensure the grievance process aligns with the organization's strategic goals.
3	Legal/ Compliance/ Liaison Officer		Legal	To ensure that the grievance process complies with relevant laws and regulations, mitigating legal risks.
4	Employee Representative		e.g., Production, Marketing, etc.	To represent the interests of employees and provide their perspective in the grievance resolution process.
5	Departmental Representative		e.g., IT, Finance, etc.	To offer department-specific insights into the grievance, as applicable.
6	External Mediator / Advisor (Optional)	(Optional)	(Optional)	An independent third-party expert who can offer an unbiased perspective and assist in resolving complex grievances.

22.7.8.3. Reporting Mechanism

Employees can report incidents of human rights violations through the following channels:

- i. Writing to ethics@vardhman.com.
- ii. Direct submission to the respective unit grievance committee/ in writing to the HR department, outlining the issue and desired resolution.

22.7.8.4. Acknowledgment of Grievance

Once a grievance is reported, an acknowledgment will be sent to the complainant within 24 hours.

22.7.8.5. Investigation Process

- The committee will conduct an initial review of the grievance to determine its validity and severity and will initiate a thorough investigation within 48 hours basis its validity and severity.
- The committee will investigate the matter, speak with the concerned parties, gather relevant evidence, and analyze the situation.
- Interviews, evidence gathering, and cross-examinations will be conducted confidentially and impartially.
- The investigation process will aim to conclude within 15 working days.

22.7.8.6. Resolution and Remedial Action

- After reviewing the findings, the committee will propose a resolution/ appropriate remedial action, ensuring all actions are within legal and company policy bounds, including counseling, training, disciplinary action, or legal proceedings if necessary.
- The complainant will be informed of the resolution and measures taken to address their grievance and take necessary follow-up actions if required.

22.7.8.7. Appeal Process

- If the complainant is not satisfied with the resolution, they can escalate the matter to a higher authority within the organization.

22.7.8.8. Confidentiality and Non-Retaliation

- All matters discussed within the Grievance Committee will be kept strictly confidential to maintain the integrity of the process and protect the privacy of all parties involved.
- Retaliation against employees who report grievances in good faith is strictly prohibited and will be subject to disciplinary action.

22.7.8.9. Grievance Register

- An online register is maintained to document all grievances, resolutions, and follow-up actions for future reference and policy improvement.

22.7.8.10. Meeting Frequency

- The committee will meet As & When needed when a grievance is reported.

22.7.9. Governance

- The Environment, Social & Governance (ESG) Committee of the Board shall govern the Human Rights Policy.
- A designated committee oversees the implementation and adherence to this policy.
- This committee is responsible for periodic human rights assessments and reporting compliance to the management.

22.7.10. Policy Review

This policy will be reviewed As & When needed, to ensure it will support continuous improvement in human rights practices through regular assessments and stakeholder engagement.