HUMAN RIGHTS POLICY

OF

APOLLO PIPES LIMITED

Version	Revision Date	Approved by	Date of Approval
1st Version		Board of Directors	25.07.2023
2nd Version	26.10.2023	Board of Directors	26.10.2023
3rd Version	05.11.2026	Board of Directors	05.11.2026

1. Objective

At Apollo Pipes Limited ('the Company'), we are committed to the principles of sustainable development including protecting human rights, respecting the dignity, well- being, and the assurance of equal rights for all individuals. This policy outlines our collective commitment to respecting human rights and preventing any violations. Our policy is in alignment with global frameworks namely SA8000, United Nations Guiding Principles on Business and Human Rights, Principles of the UN Global Compact, and Universal Declaration of Human Rights (UDHR).

2. Scope and Applicability

We are committed to respecting the fundamental rights of all people directly or indirectly related to our business which includes our employees, business partners and communities where we operate.

The principles of this Policy apply to the Company's own operations and are expected to be respected by relevant business partners, contractors, suppliers, service providers, joint ventures and other parties in the value chain, as appropriate to the nature of their relationship with the Company. The Company shall seek to communicate these expectations and encourage such partners to adopt practices consistent with this Policy.

3. Principles of the Policy

a) Gender Pay Equality and Living Wage

We adhere to all the relevant and applicable Central and State labour laws, rules and regulations and ensure that our employees and business partners are fairly and reasonably compensated irrespective of race, religion, caste, gender, or age and remuneration structure is compliant with statutory obligations of the jurisdictions in which we operate. We consistently aim to ensure that our employees are compensated at or above the legally mandated minimum wages.

b) Working conditions

We ensure the right to fair compensation and comply with all applicable laws related to payment of wages, working hours and compensatory off.

c) Equal Opportunity and Non-Discrimination

We operate as an equal opportunity employer, ensuring that all employees are treated with the highest level of respect and dignity throughout their employment, including in recruitment, training, promotion, compensation, termination, or retirement processes. Our goal is to foster an inclusive workplace that embraces diversity, welcoming employees from various backgrounds and perspectives to contribute freely and fairly. We do not discriminate based on race, religion, caste, gender, or age. Employee selection and advancement are based solely on their ability to fulfill their roles and responsibilities and their performance. APL Apollo maintains a zero-tolerance policy towards discrimination, harassment, intimidation, and any other unsafe or disruptive behavior across our operations and value chain.

d) **Forced and Child Labour**

We maintain a strict policy of zero tolerance towards any instances of forced or compulsory labor, whether within our own operations or through our business partners. We strongly oppose the exploitation of child labor (defined as individuals below the age of 18) in any form of work that is detrimental to their mental, physical, social, or moral well-being. We uphold the right of all workers to enter and leave employment of their own free will and do not endorse any form of compulsory or forced labor.

e) Occupational Health and Safety

We are committed to focusing on the holistic well-being and fitness of all employees continuously striving to enhance and advocate for an injury and incident-free workplace (IIF). We provide continuous support for initiatives that promote a healthy lifestyle and the physical and mental well-being of our employees. We have in place various practices and policy measures to ensure a safe and healthy workplace.

f) Modern Slavery

We have a zero-tolerance policy towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organizations relating to forced or compulsory labour. The Company commits to treating all employees and everyone related to its operations with dignity, respect and nurturing an environment of fairness, transparency, and trust.

g) Freedom of Association

Respects the right of employees to exercise free association, participation and provides access to appropriate redressal mechanisms.

h) Harassment Free Workplace

We have zero-tolerance for harassment, intimidation, or humiliation of any kind in the workplace, whether sexual, physical, virtual, verbal or psychological.

i) Community Engagement

We are dedicated to engaging with, preserving, and respecting the culture and heritage of local communities, particularly socially vulnerable groups affected by our operations. We strive to build positive relationships with local communities, actively working to minimize and mitigate the impact of our business operations. We support various initiatives for livelihood, sustainable development, skill enhancement, community infrastructure, healthcare, and education in the communities surrounding our facilities.

4. Our Commitments

- Continue compliance with applicable constitutional and regulatory human rights requirements;
- Align existing practices and business operations with our commitments to respect human rights;
- Continue to improve human rights performance by sharing good practices and learnings;
- Promote human rights awareness at all levels through mandatory training sessions;

- Prohibit contributions to armed conflicts or any other disputes that has the potential to violate human rights;
- Ensure compliance with all existing local, state, and national laws to guarantee equitable payment of wages to all without discrimination;
- Ensure fair compensation for all by adhering to regulatory norms;
- Zero tolerance towards any form of discrimination, child labour, and forced labour;
- Collaborate with local communities to safeguard and honor the cultural and heritage values of indigenous communities in the regions where our business operates;
- Treat all employees and workers with utmost dignity and respect;
- Maintain a strict policy against any form of workplace harassment, intimidation, or humiliation, including but not limited to sexual, physical, verbal, or psychological misconduct;
- Ensure equal access to health care within the company for all employees and workers;
- Creating unambiguous accountability through the allocation of sufficient resources and roles for the efficient management of human rights risks; and
- Appreciating diversity, promoting equal opportunities, and recognizing the importance of safeguarding the rights of vulnerable populations, including indigenous communities, women, migrant laborers, and other minority groups.

5. Grievance Redressal Mechanism

All employees have the option to raise their concerns confidentially through the Whistleblower Policy These concerns should be based on facts and include as much pertinent information as possible to facilitate their evaluation and investigation. An Ombudsperson will receive and document all complaints. As per our Whistleblower Policy, information regarding these complaints will only be shared with employees or third parties when necessary for the investigation. Any breaches of this policy will result in suitable disciplinary actions being taken.

6. Trainings

We shall continue to communicate this policy and raise awareness and knowledge amongst our employees and partners. Periodic trainings on discrimination, diversity, inclusion, respectful workplace behaviour, prevention of harassment, and reporting mechanisms shall be provided to all employees.

7. Governance

The Company shall implement this policy as per the prevailing standards. This policy is overseen by the Company's Board of Directors. Business leaders will be responsible for human rights-related performance and line managers shall be responsible for the full implementation of the related human rights standards.

8. Reporting

The Company shall measure and transparently disclose all the Human Rights Related metrics in accordance with globally recognized frameworks.

9. Review

The content and implementation of this policy will be reviewed periodically.