

USHA MARTIN LIMITED

HUMAN RIGHTS POLICY

Usha Martin Limited (“The Company”) respects and supports the dignity, well-being and human rights of all stakeholders. The Company recognizes upholding of human rights as an integral aspect of doing business and promotes human rights in accordance with the National/International policy frameworks including the United Nations Guiding Principles on Business and Human Rights (UNGPs), International Labour Organization Declaration on Fundamental Principles and Rights at Work, Universal Declaration of Human Rights, etc.

The Company is committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers). Our commitment entails respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing, and reducing potential adverse impacts through due diligence and management of issues, and resolving grievances from affected stakeholders effectively.

The Policy is applicable to all directors, employees of the Company, both permanent and contractual, its subsidiaries and joint ventures, consultants, vendors, suppliers, contractors, value chain partners or other third parties engaged with the Company and its subsidiaries or joint venture companies.

Commitment Framework:

- Responsibility towards employees and contractors: The Company is committed to:
 - maintaining positive legal compliance with applicable constitutional and regulatory human rights requirements.
 - undertaking an iterative, due diligence process, the focus of which is identifying, assessing and managing potential risks and impacts.
 - promoting awareness of the human rights with employees at various levels of our operations through training and communication.
- Community and Stakeholder engagement: The Company is committed to engaging with stakeholders in our communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. The Company recognizes and respects the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.

- **Harassment Free Workplace:** The Company is committed to providing a work environment free from harassment. The Company policy prohibits sexual harassment and harassment based on race, religious creed, colour, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, or any other type of harassment protected by federal, state, or local law or ordinance or regulation.
- **Diversity & Inclusion:** The Company aims to create an inclusive workplace and leverage the power of diversity for sustainable competitive advantage, where employees from different backgrounds can have the opportunity to participate, develop and contribute freely and equitably. The Company strives to maintain workplaces that are free from discrimination or harassment based on race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, placement, development, training, compensation, and advancement in the organization is qualifications, performance, skills and experience.
- **Avoiding connivance in Human Right abuses:** The Company ensures its non-involvement in human right abuses related to child labour, forced or compulsory labour, including bonded labour, slavery and human trafficking.
- **Health, Workplace Safety and Environment:** The Company is committed to demonstrating a high standard of environmental protection and provision of a safe and healthy workplace. The Company has in place various practices, policies and financial & non-financial measures to ensure a safe and healthy workforce.
- **Freedom of association and right to collective bargaining:** The Company recognises its workers' democratic rights to participate or not participate in trade unions, or other collective bargaining organisations, without fear of intimidation, pressure or reprisal.
- **Minimum wages:** The Company is committed towards offering fair living wages exclusive of overtimes that shall meet the needs of the employee as per local living standards.
- **Equal remuneration:** The Company is committed towards offering fair living wages exclusive of overtimes that shall meet the needs of the employee as per local living standards.
- **Right to Privacy:** The Company is committed to protect the right to privacy of its employees and other stakeholders. The Company does not disclose personal information/data to third parties, without consent of its stakeholders, unless required by law/statutory authorities etc., to do so.
- **Responsibility towards local communities:** The Company is committed to:

- avoid or mitigate risks to and impacts on the health and safety of the local community from both routine and non-routine circumstances across project cycles.
- respect and preserve the cultural lifestyle and heritage of the local communities.
- engage with the local community to understand their priorities and concerns and informing them of operations that might affect them in an accurate, transparent, culturally appropriate, and timely manner.
- avoid and minimize physical and economic displacement of people as much as possible by adopting appropriate practices.

Implementation:

In order to implement this policy, the Company shall (i) communicate this policy to all individuals and incorporate it into periodic general communication practices; (ii) Provide training and guidance as appropriate, including training on induction, management courses, recruitment and selection and promotions related aspects; and (iii) encourage its business associates and partners to abide by this policy.

Reporting violations & disciplinary action:

The Company implements the above standards by incorporating them into related policies, processes and guidelines across all business operations. The Company believes that an empowered workforce is the best way to receive feedback and identify improvement areas. The Company urges its employees to report any violations, possible violations or perceived violations to any of the following concerned authorities within the Company: Head of Department or Head of HR.

Amendments

This Policy may be updated/ amended by the Company from time to time.

Policy effective from: 11th February 2023
Policy last revised on 6th February 2024