
HUMAN RIGHTS POLICY

Authorized by:	Board of Directors
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G. Anand

HUMAN RIGHTS POLICY

1. INTRODUCTION

Usha Martin Limited (hereinafter referred to as “UML” or “Company”) respects and supports the dignity, well-being and human rights of all stakeholders. The Company recognizes the 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.

2. SCOPE

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.

3. 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 internal iterative, due diligence process, the focus of which is identifying, assessing and managing potential risks and impacts.
 - promoting awareness of human rights with employees at various levels of our operations through training and communication. The Company aims to cover 100% of its employees to undergo the awareness session. The sessions can be conducted through online, offline and eLearning methods.
- 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. The Company shall Conduct yearly stakeholder engagement surveys and implement at least 80% of actionable feedback within the next review cycle.
- 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.

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- **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.

The Company shall ensure 100% supplier contracts include a clause prohibiting human rights abuse including child labour, with strict penalties for non-compliance.

- **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. The Company shall strive to maintain zero workplace fatalities and reduce workplace injury rates by at least 10% annually through safety initiatives.
- **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. The Company shall ensure their 100% of employees and contract workers receive wages equal to or above the living wage benchmark.
- **Equal remuneration:** The Company is committed towards offering fair living wages and overtime benefits without any discrimination of gender.
- **Right to Privacy:** The Company is committed to protect the right to privacy of its employees and other stakeholders. The Company shall not disclose personal information/data to third parties, without consent from respective stakeholder(s), unless required by law/statutory authorities etc., to do so.
- **Rights of Persons with Disabilities:** The Company is committed to nurture an inclusive workplace by ensuring equal opportunities for all employees, including people with disabilities, in line with the Rights of Persons with Disabilities Act, 2016. The Company shall implement practices that promote equal opportunity, accessibility, reasonable and a non-discriminatory work environment.
- **Career Management:** The Company promotes career growth through structured skill development and mentorship programs. The Company shall implement training initiatives, leadership development programs, and mentorship opportunities to enhance employee capabilities.
- **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.

4. IMPLEMENTATION

In order to implement this policy, the Company shall

- Communicate this policy to all individuals and incorporate it into periodic general communication practices like posting on the intranet portal, company website and through training.
- Provide training and guidance as appropriate, including training on induction, management courses, etc.
- Encourage its business associates and partners to abide by this policy.

The head of Human Resource shall investigate any allegations pertaining to human rights violations / possible violations / perceived violations of our workforce within the Company and our contractors and suppliers and communities by our operations wherever we do business.

5. REPORTING VIOLATIONS & DISCIPLINARY ACTION

The Company has established a confidential and non-retaliatory grievance mechanism to address human rights concerns. Employees and stakeholders may report violations by sending an email to grievance@ushamartin.co.in

- The Company shall acknowledge receipt of reports within 7 days.
- If an employee is found guilty of a human rights violation, the head of Human Resource may take appropriate action as deemed necessary.
- If a contractor or supplier is found guilty of violation, the Company may black list such person and may cease to deal with him.

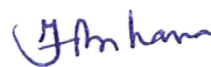
6. GOVERNANCE MECHANISM

The head of Human Resource under the oversight of the Board of Directors (BOD), shall be responsible for implementing and monitoring the Human Rights Policy and continuously improving the Human Rights conditions.

7. AMENDMENTS

This Policy may be amended, modified or supplemented from time to time to ensure compliance with any modification, amendment or supplementation to any applicable law and shall be reviewed on an annual basis.

Signature:

A handwritten signature in blue ink, appearing to read "G. Anand".

Designation : Whole-time Director

Date : 31st March 2025

