

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.

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 employees of the Company, both permanent and contractual.

Commitment Framework:

- **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 Committee is committed to providing a work environment free from harassment. The Company policy prohibits sexual harassment and harassment based on race, religious creed, color, 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.

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.

This Policy is approved by the Board at their Meeting held on 11th February 2023 and the said date shall be deemed to be the effective date of this Policy.