

	Human Resources Manual- (Human Rights Policy)		
	VGL, Jaipur		
	Country: India	Updated as on 24th January 2023	Page 1 of 4

Purpose -

The VGL Human Rights Policy sets out the principles for our actions and behaviour in relation to human rights. The Policy and associated practices are expected to strengthen over time as the Company’s operating procedures create an environment where human rights are respected, and to also help ensure that we do not engage in activities that directly or indirectly violate human rights.

Scope -

This Policy applies to all employees of VGL and its affiliates. In addition, our vendors working at our sites are expected to comply with this Policy. We will promote its principles to our vendors and suppliers through our Code for Responsible Sourcing, and also by driving industry- based social and environmental standards, and we will also engage customers and joint venture partners on these issues.

The VGL Human Rights Policy complements and brings together the human rights aspects from other Company policies and guidelines. These include our Code of Business Conduct, the Health & Safety, Environment and Human Resources policies and the Anti-Corruption guidelines. In implementing this Policy, we are subject to the laws of the many countries in which we operate, and we are committed to comply with all such applicable laws.

Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards. In situations where local law is less stringent than the International Human Rights Declarations, we endeavour to develop a response on a case-by-case basis while using our Policy as a guideline. Where local law prohibits us from upholding certain aspects of this Policy, we comply with these local laws while seeking to respect human rights.

Specific commitments and provisions

Commitments to stakeholders:

Employees: We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations. We are committed to train our employees to be aware of and respect human rights in the workplace and in the local communities directly impacted by our operations.

Business partners: We seek to respect and promote human rights when engaging with vendors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions. Suppliers operating in, or procuring from, areas where we identify our most severe risks, will be the key focus of this engagement.

Local communities: We seek to respect the human rights of local potentially affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations.



**Human Resources Manual-
(Human Rights Policy)**

VGL, Jaipur

Country: India

Updated as on 24th January 2023

Page 2 of 4

Specific provisions

Health and Safety:

Promoting Health and Safety –

VGL is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures.

Labour

Promoting Freedom of Association

VGL upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our vendors and suppliers to promote the achievement of this principle.

Eliminating Forced or Compulsory Labour, human trafficking and all forms of Modern Slavery

VGL opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery within its own operations. We will undertake work with our vendors and suppliers including due diligence within our supply chains to avoid indirectly benefitting from or promoting such illegal practices.

VGL will ensure that operational grievance mechanisms allow for cases of forced labour to be submitted and addressed.

Abolishing Child Labour

VGL opposes the use of Child labour. We will work in collaboration with vendors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child.



**Human Resources Manual-
(Human Rights Policy)**

VGL, Jaipur

Country: India

Updated as on 24th January 2023

Page 3 of 4

Eliminating Unlawful Discrimination in the Workplace

VGL is committed to ensure that each employee and potential employee is treated with fairness and dignity.

Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination.

Eliminating Harassment and Violence

VGL is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of the country.

Providing Competitive Compensation and Remuneration

VGL aims to pay competitive wages based on local market assessments and at a minimum seeks to provide a commensurate compensation for each employee.

Upholding Conditions of Employment

VGL complies with all laws regarding conditions of employment including basic and over-time working hours, and will abide by agreements negotiated with our employee representatives.

Respecting Indigenous Peoples' Rights

VGL respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards.

Adopting Proportionate Security Arrangements

VGL aims to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines, such as the Voluntary Principles on Security and Human Rights. We will adapt our security arrangements to balance the need for safety while respecting human rights.



**Human Resources Manual-
(Human Rights Policy)**

VGL, Jaipur

Country: India

Updated as on 24th January 2023

Page 4 of 4

Developing practices for Land and Water use

VGL works towards understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights, and in support of our Environment Policy.

Governance and accountability

Responsibility for the implementation of this Policy lies with the most senior executive responsible for each business segment. These executives will report on any human rights hotspots arising within our operations to the HR Head/ Global MD at least annually.

Implementation

The Company's implementation of this Human Rights Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time as corporate guidance increasingly focuses on the potential for severe human rights issues.

Implementation is supported by Procurement, Human Resources, Internal Audit, Compliance, Community, Environment, and Corporate Responsibility functions.

In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the senior executive responsible for the relevant business segment as soon as possible, and share this information with the HR Department

This Policy is the overarching statement for other standards and procedures – such as the Code for Responsible Sourcing, the External Stakeholder Engagement Procedure and the Community Grievance Mechanisms Manual that will be developed as necessary by VGL on specific human rights matters.