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HUMAN RIGHTS POLICY

ANJ TURNKEY PROJECTS PRIVATE LIMITED

2025-26

I. INTRODUCTION

At ANJ Turnkey Projects Private Limited (“ANJ”), we are committed to conducting our business operations with integrity, fairness, and in full compliance with national and international human rights standards. We recognize the inherent dignity and equal rights of all individuals and strive to uphold and promote these rights across our operations and value chain.

ANJ Group is committed to respecting and protecting human rights throughout our operations, supply chain, and business relationships. This policy applies to all employees, directors, officers, contractors, suppliers, and business partners across all regions where ANJ Group operates.

II. FUNDAMENTAL PRINCIPLES

The Constitution of India, adopted by the Constituent Assembly on 26th November 1949 and enforced from 26th January 1950, guarantees fundamental human rights as enforceable Fundamental Rights. These include:

- Right to Equality (Articles 14 to 18),
- Right to Freedom (Articles 19 to 22),
- Right against Exploitation (Articles 23 and 24),
- Right to Freedom of Religion (Article 25 to 28),
- Cultural and Educational Rights (Articles 29 and 30),
- Right to Constitutional Remedies (Articles 32 and 226).

These rights draw their essence from the Universal Declaration of Human Rights, 1948 (UDHR). ANJ’s commitment to human rights is grounded in and guided by:

- National Human Rights Commission of India (NHRC)
- Human Rights Council of India (HRC)
- Human Rights Association of India (HRAI)
- The United Nations Global Compact,
- The Universal Declaration of Human Rights,
- The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work,
- The National Guidelines on Responsible Business Conduct, 2018 (NGRBC), aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs),
- And the Fundamental Rights enshrined in the Constitution of India.

We ensure that ANJ is not complicit in human rights abuses. Where discrepancies arise between national laws and international standards, we strive to follow the higher standard. In cases of conflict, we respect national law while endeavoring to adhere to international human rights principles.

III. SCOPE AND APPLICABILITY

This Human Rights Policy applies to:

- Employees (permanent, temporary, or contract);
- Suppliers, vendors, and contractors;
- Business associates, joint venture partners, and subcontractors;

- End-customers, communities, and other external stakeholders directly or indirectly impacted by our operations.

IV. EMPLOYMENT PRACTICES AND COMMITMENT FRAMEWORK

1. Dignity of all stakeholders –

- Community* - Company should consult regularly with local communities in a sensitive and open process. Strive to achieve the free and informed consent of indigenous people to proceed with developments
- Employees* – Employees need to adhere to ANJ's Code of Conduct and shall be treated with dignity and in accordance with the ANJ policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological.
- Contractors/ suppliers* - Contractors and suppliers are expected to maintain a work environment free of all forms of harassment, whether physical, verbal or psychological. ANJ shall ensure that violations within ANJ's premises are addressed appropriately.

2. Equal Opportunity and Non-Discrimination, Workforce Diversity and Inclusion

ANJ is committed to a workplace that values diversity and ensures equal opportunities irrespective of gender, religion, caste, ethnicity, sexual orientation, disability, race, colour or any other characteristic. Our hiring and promotion practices are merit-based and aligned with the Equal Remuneration Act, 1976, the Rights of Persons with Disabilities Act, 2016, and relevant labour laws.

Company will not discriminate, directly or indirectly, based on the age of the person. Company will ensure not to treat anyone less favorably because of their actual or perceived age.

Company will not discriminate on the basis of gender on any aspect of employment (hiring, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment) and will establish employment targets to maintain gender balance.

Company will not discriminate because of marital status (i.e. single, married, in a de facto relationship, separated, divorced or widowed). Company will treat fairly and not ask discriminatory questions that point to marital status or family issues. Men & women, without any limitation, have the right to marry as per the local laws.

All differently abled will be treated with dignity and respect. Company will provide necessary facilities that should be available to disabled people that include blind, partially blind and handicapped (whether physically or mentally). Company will not do such things, which expose differently abled to undue hardships (for eg: asking them to lift heavy objects etc.).

Company will not tolerate any racial harassment like racial slurs, offensive or derogatory remarks about a person's race or color, or the display of racially offensive symbols. While defining and implementing policies, the sensitivity to traditions/ cultural aspects needs to be ensured.

We ensure an inclusive workplace where individuals are treated with respect and dignity and are empowered to achieve their full potential.

Company will not discriminate on the basis of origin/ancestry on any aspect of employment (hiring, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment).

Company will respect language, culture and values of indigenous people. Company may engage in positive discrimination towards indigenous people for vocational training, employment and education. Company will strive to achieve the free and informed consent of indigenous people to proceed with developments. Special arrangements may need to be made to accommodate and protect the prevalent traditional systems and beliefs.

Company respects the practice of faith by its stakeholders. Company does not prevent employees from wearing clothing or other symbols that are an expression of their faith, provided that such clothing or symbols do not increase the risk of accidents in the workplace and do not interfere with their ability to perform their job responsibilities.

Religion & Spiritual practice– In respecting this right, Company will ensure:

- To reasonably accommodate an employee's religious beliefs or practices, unless doing so would cause more than a minimal burden on the operations of the business (examples of some common religious accommodations include flexible scheduling, voluntary shift substitutions or swaps, job reassignments, and modifications to workplace policies or practices)
- No offensive remarks about a person's religious beliefs or practices.

Company shall not support any specific political party or candidate for political office. While Company respects individual's political affiliation or beliefs, any such activity should be done outside the Company premises and Company's resources should not be used (e.g. working hours, infrastructure, etc.)

HIV/AIDS:

- **Compliance:** The Company's policies on HIV/AIDS with regard to its employees will, at a minimum, comply with all relevant Central and State legislation and the Company will implement all policies and directions of the Government regarding HIV/AIDS whenever issued;
- **Safe and Healthy Workplace:**
 - It is the Company's objective that employees will have access to health services to prevent and manage HIV/AIDS
- **Non-discrimination:** The Company will not discriminate against any employee infected by HIV/AIDS with regard to promotions, training and other privileges and benefits as applicable to all employees. A HIV positive employee will be allowed to continue to work in his/her job unless medical conditions interfere with the specific job being done, in which case reasonable alternative working arrangements will be made; or the

employee is incapacitated to perform his/her duties and is declared medically unfit by a medical doctor, in which case the employee will be assisted to rehabilitate himself/herself outside the Company.

3. **Recognizing Collective Bargaining within Regulatory Framework**

We respect the right to freedom of association and collective bargaining as per the Trade Unions Act, 1926 and the ILO conventions ratified by India. Employees are free to form or join trade unions without fear of retaliation, and we engage in good faith dialogue with employee representatives where applicable.

4. **Workplace Safety and Health**

We are committed to providing a safe and healthy working environment in accordance with the applicable laws and other applicable health and safety regulations.

i. Well Being – Physical and Mental Health of Stakeholders

- Making available clean, potable water in the workplace
- Supplying protective equipment and training necessary to perform tasks safely
- Ensure that company operations do not adversely impact long term health of individuals'
- Not subject pregnant or breastfeeding women to conditions that would be harmful for them. Company will grant breastfeeding women reasonable breaks and a designated area where feasible for breastfeeding during work hours
- When operating in areas where contagious diseases are endemic, providing appropriate information and training to mitigate risk
- We identify, assess, and mitigate risks, provide appropriate training, safety equipment, and enforce compliance to ensure physical and mental well-being of our workforce. Appropriate personal protective equipment (PPE) is made available to all relevant personnel.
- Emergency response plans are formulated, regularly updated, and maintained.
- Support mechanisms and resources are accessible to employees to address mental health needs.

ii. Maternity related: Company will

- Provide women with maternity leave for the period as prescribed under the Maternity Benefit Act, without risk of losing their employment or responsibilities (being reviewed to further enhance the maternity leave beyond prescribed period);
- Grant women temporary leave in case of illness or complication related to pregnancy or birth, without risk of losing their employment

iii. Injury & illness: This covers an individual with a temporary or permanent disability, physical or otherwise. ANJ will:

- Provide emergency care as necessary
- Give reasonable time to recover from the injury or illness

- When the individual returns, Company will ensure that injured/ ill individuals are given appropriate duties and assistance while they recover from the injury or illness. This might include making reasonable adjustments to the workplace, although these should not cause the business unjustifiable hardships.
- iv. A culture of respect, inclusivity, and psychological safety: ANJ acknowledges human rights of its Stakeholders and it forms the central part of our community relations:
- Understanding the perspectives of local/indigenous people through consultation & respecting their rights:
 - a. Company need to understand the impact that operations can have – and it is often unintended consequences that cause problems for local people, including minorities or indigenous people
 - b. Company should create awareness among our employees of the perspectives of local people's attitudes, beliefs and values which need to be protected
 - c. Employees should draw attention to any gaps or inadequacies, and share insights
 - Conditions of work & wages: Being trained to work and then working in safe, healthy and environmentally responsible ways comes first and foremost. Factory Act 1948 form the basis for recording and notification of occupational accidents and diseases in the organization:
 - a. Ensure that wages are in accordance with the Minimum Wage Act & law of the land.
 - b. Ensure that employees are fairly remunerated, and that wages are regularly reviewed in a fair process
 - c. Company will over time harmonize health and safety standards and aim to make them uniform across the locations it operates in. Joint health & safety committee involving management and worker representatives can be formed to identify improvement areas.
 - Privacy: Company will
 - a. ensure that, upon request, individuals will be made aware of personal information that the business maintains on them, where it is held and how it can be updated
 - b. Not ask workers about their health or pregnancy status except when the status is directly relevant to the performance of job duties, and seeking to keep such information confidential
 - c. Ensure adequate protection of personal information held by the company
 - d. Only provide an individual's personal or other information to government authorities to the extent required by law and upon request, or with the individual's permission
 - e. Seek to minimise the use of monitoring, surveillance and security measures that may invade the privacy of individuals to the extent practicable, and using such measures solely for the legitimate business purpose of protecting its assets and the safety of its workers or others.

5. Supply Chain and Business Relationships

i. Supplier Code of Conduct

- Our commitment to human rights extends across our entire supply chain.
- All suppliers and business partners are expected to adhere to our defined human rights standards.
- Periodic audits and evaluations are carried out to monitor and ensure compliance.

ii. **Responsible Sourcing**

- We are dedicated to eradicating all forms of forced and child labour within our supply chain.
- Robust due diligence procedures have been established to identify and mitigate risks.
- We maintain transparency in our sourcing practices through regular and open reporting.

6. Environmental Measures

ANJ recognizes the right of every individual to a clean and sustainable environment. We comply with the Environment (Protection) Act, 1986, Air and Water Acts, and promote sustainable practices that reduce our carbon footprint and conserve resources. We are committed to circular economy principles and reducing our environmental impact.

7. Prohibition of Child Labour, Forced Labour and Human Trafficking

We maintain zero tolerance towards:

- Child Labour, prohibited under the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986,
- Forced or Bonded Labour, prohibited under the Bonded Labour System (Abolition) Act, 1976,
- Human Trafficking, as per Section 370 of the Indian Penal Code and aligned with international anti-slavery laws.

Our recruitment and third-party engagement practices are designed to ensure full compliance.

ANJ ensures that all our employees and contractor employees (if any) are working voluntarily. We do not engage or support the use of Forced/Bonded Labor in any of offices and sites.

We promote, advice and shall ask all our contractors, sub-contractors and vendors to discourage the engagement of Forced/Bonded Labor.

All Employees shall have the right to leave the workplace after completing their standard workday and be free to terminate their employment provided they adhere to the notice period clause in their appointment contracts. This is in compliance with Indian Bonded Labor system (abolition) Act 1976 and the contract labor (regulation and abolition) Act, 1970. All employees are informed of the terms of their employment, job duties and hours of work and weekly offs. The Company does not keep original qualification documents of employees.

ANJ will always take proof of age from every employee at the time of offering employment to any person. *(Since the Act allows employment from age 14 upward, only in very special cases, with all safety precautions, and when there is no utilisation of hazardous material or equipment, will ANJ allow employment of labour from age 14 upward)* In case of Associated & Partner Companies, Suppliers, Contractors, etc., ANJ can ask for age proof of their employees, wherever there is a doubt or requirement by law. ANJ follows and will always follow the Child Labour (Prohibition & Regulation Act), 1986 with all its amendments and updates.

8. Prohibition, Prevention & Redressal of Harassment

We maintain a zero-tolerance approach to all forms of workplace harassment, including sexual harassment. We are fully compliant with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and have established Internal Committees at each work location. We also have training programs, awareness campaigns, and confidential reporting mechanisms in place to support a respectful work culture.

9. Inclusive Employment Standards

Our employment policies are in line with India's labour codes and international standards. We promote fair working hours, adequate rest, living wages (as per **Minimum Wages Act, 1948**), and ensure that employment relationships are based on freely given consent with written terms of employment.

B. Human Rights Capacity Building

ANJ regularly conducts training, workshops, and awareness campaigns to build capacity across the organisation on human rights issues. This includes:

- Induction training for new employees,
- Annual refresher sessions,
- Vendor and contractor sensitization programs,
- Leadership commitment to fostering a rights-based culture.

V. Due Diligence

We undertake periodic Human Rights Due Diligence (HRDD) to identify, prevent, and mitigate adverse human rights impacts of our operations. This includes:

- Risk assessments during project planning and procurement stages,
- Evaluating human rights performance of suppliers and partners,
- Incorporating human rights clauses in contracts,
- Ongoing monitoring and audits.

VI. Grievance Redressal

We maintain accessible, confidential, and effective grievance redressal mechanisms that allow stakeholders to raise concerns without fear of retaliation. These include:

- Employee grievance redressal procedures,
- POSH Internal Committees,
- Anonymous reporting channels (email, hotline),
- Escalation to human resources or leadership.

All complaints are addressed promptly, transparently, and in line with the principles of natural justice.

Reporting Channels

- We provide multiple, confidential channels for reporting human rights concerns
- Whistleblower protection is guaranteed
- No retaliation will be tolerated against those who report in good faith

Investigation and Remediation

- All reports are thoroughly investigated
- Appropriate corrective actions are taken

- Lessons learned are integrated into our continuous improvement process

VII. Governance and Accountability

1. Leadership Commitment

- Senior leadership is directly responsible for human rights performance
- Regular review and update of this policy
- Integration of human rights considerations into strategic decision-making

2. Transparency and Reporting

- Annual human rights performance report
- External verification and validation of our practices
- Continuous engagement with stakeholders

VIII. Communication of the Policy

This policy is publicly available on the company's website and is also:

- Circulated to all employees,
- Shared with business partners and vendors,
- Integrated into onboarding and compliance programs.

Efforts are made to communicate the policy in languages and formats understood by all stakeholders.

Contact Information

For any questions or concerns regarding this Human Rights Policy, please contact:

- Human Resources Department
- Ethics and Compliance Office
- Email: hr@anj.co.in

F. Disclosing Performance on Human Rights Policy Commitments

We are committed to transparency in our human rights practices. ANJ will:

- Disclose key metrics in our **Annual Sustainability Reports**,
- Share initiatives, progress, and challenges in upholding human rights,
- Engage with stakeholders and incorporate feedback to improve our practices.

Conclusion

ANJ Turnkey Projects Private Limited is committed to creating a business ecosystem that respects and promotes human dignity. We strive to go beyond compliance, embedding human rights into the core of our values, policies, and operations, and actively contributing to the advancement of a just, inclusive, and sustainable society.