



ESG Policies

ANJ TURNKEY PROJECTS PVT LTD

Issued Date: 10.05.2024

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ANJ TURNKEY PROJECTS PVT. LTD. – ESG POLICIES

Issued Date: 10.05.2024

ANJ TURNKEY PROJECT PVT. LTD.

CIN-U74210MH2008PTC181752

112D, Kandivali Govt. Industrial Coop. Society, Behind OM Sai Honda Service Centre, Hindustan Naka, Kandivali W,
Mumbai 400 067.

Board: +91 022 61714101 Web: www.anj.co.in



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Environmental Policy

ANJ Turnkey Projects Pvt. Ltd.

At ANJ Turnkey Projects Pvt. Ltd., we recognize our responsibility to prevent Pollution and protect the environment and are committed to integrating sustainability into all aspects of our operations and services. We focus on the design, development, commissioning, and successful execution of projects in General Contracting, Design, Design & Build, and Civil Interiors. Guided by our ISO 14001 Standard and industry best practices, we strive to continually improve our environmental performance and contribute to a healthier, safer, and more sustainable future.

We shall:

- Comply with all applicable environmental laws and regulations.
- Conserve natural resources by reducing energy, emissions, and water use.
- Prevent pollution and manage materials, chemicals, and waste responsibly, promoting reuse and recycling.
- Ensure removal of waste as per defined procedures, with reduction of waste as a main focus across the organization.
- Incorporate sustainable design and construction practices that support circular economy principles.
- Build awareness and engage employees, partners, and stakeholders in achieving our environmental goals. Set, monitor, and review objectives to ensure continual improvement of our Environmental Management System.
- Commit to continual improvement in environmental performance through innovation, periodic review, and stakeholder engagement.

This policy will be communicated to all employees and stakeholders and reviewed periodically to ensure its relevance and effectiveness.

Authorized Signatory
For ANJ Turnkey Projects Pvt. Ltd.
Date: 06.05.2024

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Energy Consumption & GHG policy

Green House Gas Emission & Decarbonization Policy:

The purpose of this policy is to affirm ANJ Turnkey Projects Pvt. Ltd.'s commitment to addressing climate change by reducing greenhouse gas (GHG) emissions and progressing towards decarbonization in our operations, furniture manufacturing to support the design and project activities.

Scope: Applicable to all business operations of ANJ Group.

Objective: To integrate decarbonization into our core business by improving energy efficiency, promoting renewable energy, and minimizing emissions from our worksites, factory and logistics. We plan our carbonisation path by creating awareness among employees and stakeholders, setting specific targets aligned with INDC to contribute to a low carbon future.

Targets:

- To Embed decarbonization principles in our design and construction practices.
- Achieve carbon neutrality for Scope 1 and Scope 2 emissions by 2030.
- Progress towards Net Zero carbon emissions across all operations (Scope 1, 2 & 3) by 2040.
- Increase renewable energy share in the energy mix annually until reaching 100% by 2030.

Responsibility: Sustainability committee

Monitoring and Review: Emissions and energy performance will be tracked continuously and reviewed on a monthly basis across sites, with an annual GHG accounting conducted to assess and report progress against targets. Monitoring will include continuous tracking of all emissions to ensure measurable improvements.

Implementation and Commitments:

ANJ is committed to:

- Complying with all applicable climate regulations and aligning with the Country's SDG targets.
- Monitoring energy use and related GHG emissions across operations.
- Improving efficiency in machinery, equipment and building operations.
- Promoting sustainable construction and material practices to reduce embedded carbon.
- Engaging employees, partners, and stakeholders in decarbonization efforts.
- Adopting eco-friendly process improvements and conserving raw materials.

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Decarbonization Strategy - Reduction

This relates to activities undertaken to reduce Greenhouse Gas (GHG) Emission.

Scope 1: Direct emissions are reduced by conserving raw materials, adopting eco-friendly process approaches and using energy efficient equipment and machinery at our factories and project sites.

Scope 2: Indirect emissions from purchased electricity are managed by increasing the use of renewable energy and by adopting efficient HVAC, lighting and electrical systems across operations.

Scope 3: Indirect emissions from transportation and logistics are addressed by encouraging commuting through fuel efficient vehicles, pooling of commuters and promoting the use of electric and CNG vehicles, while also ensuring efficient logistics planning.

Renewable Energy Policy:

ANJ Turnkey Projects Pvt. Ltd. is committed to harnessing renewable energy potential and progressively increasing the use of green energy across its operations. By minimizing reliance on fossil fuels, we aim to reduce our greenhouse gas emissions, support India's clean energy transition and contribute to protecting the environment.

Scope: Applicable to all activities of ANJ Group.

Objective: To increase the share of renewable energy in our overall energy mix, reduce carbon emissions and contribute to a low carbon energy transition.

Targets:

Increase the share of renewable energy in total electricity consumption by 15 percentage points each year, to achieve 75% renewable energy by 2030 and to progress towards 100% RE by 2040, in alignment with ANJ's Net Zero vision.

Responsibility: Sustainability Department

Monitoring and Review: Energy consumption and renewable energy usage will be monitored continuously, with annual reviews of the energy mix and procurement sources. Adjustments will be made based on performance, regulatory changes, and availability of renewable energy in the market.

Actions Taken:

- Rooftop solar panels installed at ANJ's IGBC Platinum factory in Wada, generating 800 kW of clean renewable energy, enabling the facility to operate as a Zero Net Energy Building.
- Integration of renewable energy in new project planning and design.

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Collaboration with the Global Network for Zero (GNFZ) under the Net Zero Factory Certification Program, following the completion and validation of Scope 1, 2, and 3 GHG emission assessments by GNFZ to support ANJ Factory's journey toward Net Zero certification.

Water

Water Management Policy:

The purpose of this policy is to affirm ANJ Turnkey Projects Pvt. Ltd.'s commitment to responsible water management by reducing water consumption, minimizing wastage, and safeguarding water resources across all operations, including its offices, project sites, during design and execution up to project handover.

Scope: Applicable to all activities of ANJ Group.

Objective: To implement sustainable water practices by reducing consumption, enhancing reuse and recycling, and promoting conservation and recharge. To integrate rainwater harvesting and groundwater recharge into site development and operations. To raise awareness among employees, workers and stakeholders to ensure responsible water management across all facilities and project sites.

Targets:

Reduce overall freshwater consumption to 80% by 2030 from the FY 2024-25 baseline through efficiency improvements, reuse and recycling measures.

Ensure 100% installation of water efficient fixtures (aerators, low flow taps, sensors) at ANJ's facilities by 2030.

Implement rainwater harvesting systems at all major facilities by 2030.

Responsibility: Sustainability committee

Monitoring and Review: Water consumption and recycling are monitored monthly through water meters and site level tracking. An annual review assesses progress and incorporates changes based on operations, regulations, and stakeholder feedback.

Actions to be Taken:

- Provision of safe and clean drinking water for all workers and staff at sites, with regular quality monitoring and responsible usage practices.
- Regular monitoring and repair of leaking taps/pipes to prevent water wastage.
- Establish Water efficiency indicators (e.g., liters per person per day or per project area) by FY 2025–26 and track annual improvements thereafter.
- Conduct water use assessments annually to identify top high consumption activities and reduce usage through optimized scheduling or equipment.

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- Explore Zero Liquid Discharge (ZLD) or near-zero discharge practices at factory and major sites by 2030.
- Segregation and proper treatment of wastewater from the operations Awareness programs on water conservation among workers and staff.

Materials, Chemicals & Waste

Waste Management Policy:

To minimize waste generation, promote reuse and recycling and ensure safe handling and disposal of hazardous and non-hazardous waste in compliance with all applicable legal requirements and sustainability standards.

Scope: Applicable to all activities of ANJ Group

Objective: To reduce impact to the environment by substituting input materials with less hazardous or toxic alternatives and ensuring proper handling and disposal of all waste types.

Targets:

Divert at least 90% of interior and operational waste from landfills by 2030, through material reuse, recycling and responsible disposal supporting ANJ's circular economy goals.

Maximize reuse and recycling of interior materials, such as wood, metal, glass and packaging materials, to minimize waste generation at source.

Ensure 100% waste segregation across factory, offices and project sites to enable efficient recycling and recovery.

Responsibility: All employees of ANJ Group.

Monitoring and Review: The Environmental Team monitors monthly waste generation and disposal data at factory and project sites. Annual reviews incorporate regulatory updates, industry practices and stakeholder expectations to ensure continuous improvement.

Implementation & Actions Taken:

Procedure:

Segregation System: Hazardous waste to be stored separately from general or biomedical waste. Clearly labeled containers with type, date, and hazard symbols. Corian dust and adhesives must be collected in sealed, inert containers.

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Non-Hazardous Waste Management: Biodegradable and recyclable wastes (wood, paper, cartons, plastics, metal scraps) are collected and sent to authorized recyclers for reuse and recovery.

Hazardous Waste Management: Hazardous wastes such as paint residues, adhesives, sealants, used chemical containers and contaminated rags or PPEs are segregated and stored in labelled hazardous waste and disposal is carried out only through MPCB authorized handlers in compliance with the *Hazardous and Other Wastes Rules, 2016*.

Awareness & Training: Regular training and awareness sessions are conducted for employees, contractors, and workers on safe waste segregation, handling, and disposal.

Customer Health & Safety

Customer Health & Safety Policy:

The health and safety of our customers, end users, and all stakeholders are of paramount importance. At ANJ, we are committed to delivering projects and services that meet the highest standards of safety, quality, and environmental compliance. We safeguard the health and safety of employees, customers and communities through eco-friendly practices and strict adherence to legal and product safety requirements.

Scope: Applicable to all operations of ANJ Group.

Objective: To mitigate adverse health and safety impacts associated with ANJ's products, services and project activities by ensuring design integrity, compliance with applicable laws, proactive risk management through Hazard Identification and Risk Assessment (HIRA) studies at the design and execution stages, supported by continual improvement.

Targets:

Achieve zero customer safety incidents related to ANJ's design, construction and project delivery, and maintain this performance beyond 2030 through continual improvement and preventive measures.

Responsibility: All employees of ANJ Turnkey Projects Pvt. Ltd.

Monitoring and Review: Customer safety performance is monitored through incident reporting systems, periodic audits and customer feedback. Annual assessments are conducted to review safety performance, complaints and corrective actions to ensure continual improvement.

Implementation & Commitments:

- Design, fabricate, and deliver products and services that are safe for customer use.

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- Carry out proactive safety reviews and HIRA studies to identify and minimize risks, including hazards such as sharp edges, confined spaces or slippery surfaces.
- Use safe and sustainable packaging materials, prioritizing biodegradable or recyclable options where feasible.
- Act promptly on customer feedback and complaints with corrective and preventive actions.

Sustainable Design & Advocacy Policy:

At ANJ Turnkey Projects Pvt. Ltd., we recognize that our responsibility extends beyond managing our own environmental impacts. As a design, build, and turnkey contracting company, we are uniquely positioned to integrate sustainability principles into our projects and advocate for responsible design and construction practices that help our clients and partners reduce their ecological footprint.

Objectives:

We are committed to integrate sustainability into the services we deliver by:

- Enabling clients to reduce their carbon footprint through innovative design, energy-efficient solutions, and sustainable material selection.
- Providing alternatives and guidance that support responsible consumption and resource efficiency across client projects.
- Advocating for sustainable practices in the built environment by sharing knowledge, promoting circular economy principles, and encouraging adoption of renewable energy and low-carbon technologies.
- Collaborating with stakeholders to promote awareness of environmental issues and solutions that mitigate climate change, pollution, and resource depletion.

Targets:

- Continue integrating sustainable design and material selection principles, such as low-VOC paints, FSC-certified wood, recycled content materials and efficient lighting, across all turnkey projects, with the goal of achieving 100% integration by 2030.
- Scale up the integration of **renewable energy and low-carbon solutions** in project delivery, aiming for **50% of projects adopting such measures by 2028**.

Activities to be taken:

- Incorporate sustainability advisory into project design and delivery, offering eco-friendly alternatives such as energy-efficient lighting, water-saving fixtures, and low-VOC materials.

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- Provide environmental performance insights (e.g., estimated energy savings, water conservation, and carbon reduction potential) to clients during the project lifecycle.
- Promote reuse, repair, and recycling opportunities in interiors and construction, extending product and material life cycles.
- Advocate for fossil fuel phase-out and renewable adoption by encouraging green energy integration in client projects.
- Support clients in aligning with green building certifications (e.g., IGBC, GRIHA, LEED) to strengthen their sustainability journey.

Monitoring & Review:

The Sustainability Committee will monitor progress annually by tracking the proportion of projects where sustainable solutions were offered and adopted, and by collecting client feedback on environmental services provided. The policy will be reviewed periodically to remain relevant to evolving client needs, market trends, and global sustainability challenges.

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Labour and Human Rights Policy

ANJ Turnkey Projects Pvt. Ltd.

At ANJ Turnkey Projects Pvt. Ltd., we are committed to respecting human rights and upholding fair labor practices across our offices, project sites and factory operations. This policy applies equally to employees and workers engaged in ANJ projects and operations. Guided by the Universal Declaration of Human Rights, ILO Core Conventions, UN Guiding Principles on Business and Human Rights and our ISO

45001 aligning Occupational Health & Safety Management System, we strive to provide safe, inclusive and dignified working environments while ensuring continual improvement in our social performance.

We shall:

- Ensure safe and healthy workplaces through elimination of risk, protective equipment, periodic safety inspections and regular training.,
- Uphold fair working conditions with legal compliance, fair wages, equal pay for equal work, transparent contracts, reasonable working hours with appropriate breaks and rest periods.
- Respect workers' rights to representation, dialogue and grievance redressal without any reprisals or threats of reprisals
- Maintain zero tolerance for child labour, forced labour and human trafficking in all operations and supply chains.
- Promote equality and inclusion by ensuring workplaces free from harassment, discrimination, and bias.
- Support training, career growth, and safety awareness for employees and workers alike.
- Engage and raise awareness and engage among employees, contractors and stakeholders on labour and human rights and workplace safety responsibilities.
- Set and review objectives for continuous improvement in human rights, labour standards, and occupational health & safety.

This policy will be communicated to all employees and workers to ensure awareness and effective implementation.

Authorized Signatory
For ANJ Turnkey Projects Pvt. Ltd.

Date: 06.05.2024

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Occupational Health and Safety

Employee Health & Safety Policy:

At ANJ Turnkey Projects Pvt. Ltd., the health and safety of our employees and workers is paramount. We are committed to safe and healthy workplaces across offices, project sites and factory operations by fulfilling the compliance obligations. Guided by our ISO 45001 aligned Occupational Health & Safety Management System, we commit to provide safe and healthy working conditions for the prevention of work-related injury and ill health, to eliminate hazards and reduce risks and embed a culture of safety and continual improvement through consultation and participation of Workers

Scope: Applicable to all activities of ANJ Group.

Objective:

To safeguard the well-being of all personnel by identifying the hazards and eliminating and/or reducing the workplace risks, complying with legal and client requirements and fostering a proactive safety culture with active worker participation.

Targets:

- Report Zero accidents and Injuries.
- Ensure 100% reporting of near misses and taking action plans.

Responsibility: EHS Department / Health & Safety Committee under the HSE Head/Senior Management.

Monitoring and Review: Performance is monitored through incident and near-miss reporting, audits and inspections, and occupational health surveillance. Results are reviewed by management to ensure accountability, corrective actions and continual improvement.

Implementation & Actions Taken:

- Conducting HIRA and control at all sites.
- Ensuring induction and job specific training, daily toolbox meetings (TBM) and periodic safety drills.
- Providing and enforcing PPE use, maintaining first aid, emergency preparedness, and welfare facilities (safe drinking water, sanitation, rest areas, prescribed regular health checks).
- Maintaining 5S/housekeeping standards and scheduled HSE/5S audits.
- Applying permits to work and on-job safety analysis for high-risk activities.
- Encouraging open reporting of hazards, near-misses and incidents without retaliation and empowering personnel to stop unsafe work or remove themselves from imminent danger.
- Ensuring contractors and their personnel comply with ANJ's HSE requirements and applicable laws while executing work at ANJ sites.

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Health & Safety Communication Policy:

At ANJ Turnkey Projects Pvt. Ltd., we are committed to maintaining a safe, healthy and environmentally responsible workplace across all offices, factory operations and project sites. Effective HSE communication ensures that all employees, contractors and stakeholders are informed, aware and engaged in preventing incidents and promoting a strong safety culture.

Objective: To communicate health and safety requirements clearly and consistently to all stakeholders, both internal and external, enabling informed participation and consultation in maintaining safe work environments.

Internal Communication: ANJ will use the following channels to keep employees, contract staff and workers informed and engaged:

- Notice boards, Morning briefings, toolbox talks and site safety inductions.
- Posters, signage and emergency instructions displayed in local languages.
- Training programmes on fire safety, first aid, PPE usage and hazard awareness.

External Communication: ANJ will:

- Collaborate with clients, vendors and contractors to share fire safety, emergency, and workplace safety requirements.
- Include HSE requirements in agreements with suppliers, subcontractors and service partners.

Responsibility: EHS Department

Monitoring & Review: Effectiveness of communication is assessed through:

- Periodic reviews of training attendance, toolbox talks and committee minutes.
- Feedback and suggestions collected via grievance or open-door channels.
- Annual Events shall be organized with Suppliers and Contractors, and best practices will be implemented.

Fire Safety Policy

ANJ Turnkey Projects Pvt. Ltd. is committed to protecting the lives of employees, visitors, contractors, buildings, plants, machinery and surrounding property from fire hazards by maintaining a robust Fire Management System covering prevention, detection, protection and compliance with statutory requirements.

Scope

Applicable to all ANJ offices, factories, warehouses, project sites and contractor premises.

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Objective: To detect and respond quickly to fire emergencies to minimise harm to people, property and the environment. To ensure compliance with national fire safety codes, building bylaws, and client specific fire regulations.

Responsibility: All Employees & Contractors

Implementation & Monitoring:

- Assess the fire load and provide adequate fire-fighting equipment such as extinguishers, hydrants, sprinklers and hose reels as per workplace risk assessment.
- Store flammable or combustible materials safely, away from ignition sources, with clear labelling and segregation of incompatible materials.
- Contractors shall ensure proper handling and storage of ANJ/client supplies, including insurance against fire damage.
- Conduct periodic fire audits, mock drills and evacuation rehearsals at all locations.
- Train designated fire wardens and employees in the proper use of fire-fighting equipment.
- Maintain emergency exits, escape routes and assembly points, keeping them free of obstruction at all times with appropriate signage.
- Contractors and subcontractors must follow ANJ's fire safety instructions and maintain their own fire protection arrangements while on site.

Labour & Human Rights

Working Conditions Policy:

At ANJ Turnkey Projects Pvt. Ltd., we are committed to providing fair, safe and dignified working conditions for all employees and workers across our offices, project sites and factory operations. We ensure compliance with the national labor code, applicable statutory requirements and align our practices with the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our approach emphasizes welfare, Health care, work life balance, worker participation and respect for human rights.

Scope: Applicable to all employees and workers of ANJ Group.

Objective: To uphold the rights of all workers including contractors, ensuring freedom from discrimination, harassment and victimization, while promoting equality, fair pay, safe and Healthy working conditions and respect for dignity in the workplace.

Targets:

To foster a culture of respect, inclusivity, and continuous improvement in working conditions by:

- Encouraging employee feedback and participation.

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- Ensuring access to welfare and healthcare facilities, including **annual health check-ups** for employees and workers.
- Promoting proactive workplace safety, health, and well-being enhancements.
- Provide migrant workers with adequate accommodation at the project sites.

Responsibility: Human Resources (HR) Department

Monitoring and Review:

- Regular internal audits and site inspections.
- Worker feedback and grievance redressal mechanisms.
- Health and safety performance tracking, including annual health check-up records.
- Review of welfare facilities, working hours, and wage compliance.
- Monitoring incidents, near-misses, and corrective actions taken.
- The HR Department and senior management jointly review these results periodically to ensure compliance, identify gaps, and drive continual improvement in working conditions and employee well-being.

Implementation & Actions Taken:

- Ensure non-discrimination based on race, gender, age, disability, nationality, religion or any other factor.
- Uphold the right to freely chosen employment and prohibit child labor, forced labor, and trafficking.
- Respect the right of workers to participate in representation and collective dialogue.
- Provide a safe and environmentally responsible workplace, with proper welfare facilities.
- Conduct PPE audits regularly to ensure proper and consistent use of approved protective equipment.
- Ensure compliance with working hours, minimum wage provisions and statutory labor welfare requirements.
- Providing employees with clear, written details of wages and benefits for each pay period.
- Display the rights of workers in the local languages (understandable to the workers) and the related sign boards at all prominent places.

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Wages, Benefits & Compensation Policy:

At ANJ Turnkey Projects Pvt. Ltd., we are committed to providing fair wages, benefits, and compensation that support a decent standard of living for all employees. We uphold the principle of adequate living wages ensuring that pay respects human dignity, promotes financial security, and contributes to sustainable livelihoods. Our approach goes beyond compliance by striving for continual improvement and alignment with international labour standards.

Scope: This policy applies to all employees and workers of ANJ, including permanent, temporary and contractual staff across offices, project sites and factories. Contractors and suppliers engaged by ANJ are also expected to comply with these principles.

Objective: To ensure that all employees are fairly compensated through transparent, timely and lawful wage practices, including proper compensation for extra working hours, while progressively aligning with adequate living wage principles and providing statutory benefits such as leave, insurance and social security.

Targets:

Achieve 100% compliance with statutory minimum wage laws and overtime pay requirements across all operations-

Conduct annual wage benchmarking to ensure adjustments remain above inflation and aligned with industry standards as per the wage codes.

Responsibility: Human Resources (HR) Department, Finance Department, Legal Team

Monitoring and Review:

1. Regular Wage Audits

Verify through annual audits that all employees, including contract workers, are consistently paid wages equal to or above the applicable statutory minimum, and address any wage disparities across shifts, roles, or locations.

2. Contractor/Subcontractor Wage Compliance Tracking

Collect and review monthly wage disbursement records from all contractors to ensure their workers receive the statutory minimum wage and fair compensation for extra working hours and confirm the availability of supporting documentation such as pay slips and payment receipts.

3. Employee Feedback & Grievance Redressal System

Monitor the grievance system regularly to identify and promptly resolve wage-related complaints, ensuring that recurring issues are escalated and corrective measures are implemented at the root cause level.

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Implementation & Actions Taken:

- Wages and benefits are structured to comply with the Minimum Wages Act, 1948, the Payment of Wages Act, 1936, the Factories Act, 1948 and other applicable statutory requirements.
- The bonuses are fixed through consultation and participation from worker's representatives
- All employees receive clear written communication on wages, allowances, benefits and deductions through monthly payslips.
- Wages are distributed monthly, in compliance with applicable laws, ensuring timeliness, fairness and transparency.
- Compensation for overtime and extra working hours is paid at statutory premium rates and monitored through payroll audits.
- Benefits such as provident fund, insurance, maternity/paternity leave and statutory bonuses are provided as required by law.
- Contractor and subcontractor compliance is monitored to ensure fair wage practices across the supply chain.
- Employees are encouraged to raise wage related concerns through grievance channels without fear of retaliation.
- Awareness sessions and training are provided on employee rights, fair compensation and financial transparency.

Working Hours Policy

ANJ Turnkey Projects Pvt. Ltd. is committed to maintaining reasonable working hours, adequate rest and a healthy work life balance for employees and workers in accordance with the Factories Act, 1948 and other applicable labour and employment laws..

Scope

Applies to all employees, workers and contractors at offices, sites and factories.

Objective

To comply with statutory limits on working hours, overtime, weekly rest and public holidays while ensuring employee well-being.

Targets

Maintain a culture that prevents excessive hours and protects rest periods.

Responsibility: Human Resources (HR) Department

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Monitoring & Review: ANJ will monitor compliance with this policy through quarterly payroll and attendance sheet checks, along with regular reviews by the HR department to ensure adherence to overtime and rest day requirements. Employee feedback on working hours or rest provisions will be collected through established grievance channels to support continual improvement.

Procedure & Implementation

- Display approved shift timings and holiday lists.
- Keep daily attendance and overtime registers (biometric or manual).
- Provide lunch/rest breaks per state law.
- Ensure overtime is voluntary and compensated at premium rates.
- Awareness and display of Leave rules and Leave compensation

Parental Policy

ANJ recognizes the importance of supporting employees during parenthood. We provide paid maternity, paternity and adoption leave, as well as child-care support, aligned with the Maternity Benefit Act, 1961 (amended 2017) and good practices.

Scope

All eligible full-time employees.

Objective

To safeguard employment during maternity or paternity and enable employees to balance family and work responsibilities.

Targets

- Ensure 100% compliance with the Maternity Benefit Act and related leave provisions.
- Offer at least 5–10 days paid paternity leave.
- Provide crèche facilities where ≥ 30 women are employed.

Responsibility: Human Resources (HR) Department

Monitoring & Review: HR will regularly track leave records and health records to ensure timely wage payments during maternity, paternity or adoption leave. An annual compliance review will also be conducted to confirm adherence to statutory maternity benefits, paternity leave provisions and crèche facility requirements.

Procedure & Implementation

- Women with 80+ days service in 12 months get 26 weeks paid maternity leave (12 weeks up to 2 children or 2nd Delivery).

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- Paternity leave of 5–10 days within 3 months of birth/adoption.
- Adoptive/commissioning mothers: 12 weeks leave.
- Crèche or allowance where no facility exists.
- No termination during maternity/paternity leave except gross misconduct.
- Awareness sessions to inform staff of benefits.

Career Management & Training policy:

ANJ is committed to cultivating a culture of continuous learning and competency improvement by implementing a structured Career Management and Training Policy that equips employees with the skills, knowledge, and developmental opportunities necessary to advance their careers, align with business goals, and drive long-term organizational success. The professional growth of the employees shall be through transparent appraisal system with competence as the primary selection criteria without discrimination on grounds of age, race, sex, and religion.

Scope: Applicable to all employees of ANJ Group.

Objective:

To attract committed and high-potential candidates and retain them through structured and motivational human resource practices there by reducing attrition.

Targets:

Achieve a minimum of 10 hours of job-relevant training per employee per year across technical, safety, and leadership modules by 2030.

Conduct annual career progression reviews for at least 90% of employees starting from 2025, to assess growth readiness and realign development goals.

Responsibility: Human Resources (HR) Department, Department Heads (HoDs), Leadership Team.

Monitoring and Review:

1. Individual Development Plan (IDP): Regular Appraisal and feedback of employee IDPs to ensure they are updated, realistic, and aligned with career aspirations and company goals.

Annual appraisals will be conducted by HR and department heads to evaluate plan relevance, progress, and necessary interventions.

2. Internal Mobility & Promotion Metrics: Track rates of internal promotions, lateral moves, and career transitions across functions or roles. Multi-tasking will be provided for all the relevant interested personal.

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3. Employee Feedback & Engagement Surveys: Conduct regular employee satisfaction surveys and their training requirements with career growth opportunities, mentoring, and skill development

Survey results will be analysed annually to identify barriers to growth and inform updates to training and career programs.

4. Training ROI & Skill Gap Assessments: Compare pre- and post-training performance and conduct skill gap analyses using KPIs and supervisor assessments. Annual skill gap analysis and competency matrix will be reviewed to align future training investments with business-critical competencies and evolving technology trends.

Child Labor, Forced Labor and Human Trafficking Policy:

ANJ Turnkey Projects Pvt. Ltd. maintains zero tolerance towards child labour, forced or bonded labour and human trafficking. We are committed to protecting human dignity by ensuring that all employment is freely chosen, lawful and respectful of workers' rights. This policy aims to ensure a safe, respectful, and legally compliant work environment.

Scope: Applicable to entire ANJ Group.

Objective:

- To eliminate all forms of child labour, forced labour and human trafficking from ANJ's operations and supply chain.
- To ensure all employment is voluntary, lawful and free from coercion or retention with or without personal documents.
- To require contractors and suppliers to comply with statutory labour laws and prohibit the engagement of minors under 18 at project sites.

Targets:

Quantitative: Conduct regular internal and third-party audits to ensure 100% compliance with child labor forced labor and anti-trafficking requirements across operations and supply chains on an annual basis.

Responsibility: Human Resources (HR) Department

Monitoring and Review: Compliance is monitored through internal inspections, labor audits, and contractor oversight. Results are reviewed by HR and senior management under ANJ's ESG framework.

Implementation & Actions Taken:

- **Proof of Age Verification:** Age documents are verified during recruitment; no person under 18 years is permitted to work at ANJ project sites.

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- **Voluntary Employment:** Employees and workers, including contractor employees, work voluntarily. No deposits, original documents or identity papers are withheld.
- **Contractor Compliance:** Contractors and subcontractors must comply with labour laws, including the Child Labour Act and the Contract Labour Act. Violations result in penalties, recovery of damages, or contract termination.
- **Migrant Labours:** Compliance to the Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979, ensuring proper registration, wage parity and welfare provisions for migrant workers.
- **Worker Welfare:** All employees and contract workers, including inter-state migrant labour, are provided safe working and living conditions, adequate rest, health facilities and fair wages as per applicable laws. Employment terms are communicated in a language they understand
- **Supply Chain Due Diligence:** Vendors and suppliers certify that they do not engage in child or forced labour; ANJ may conduct audits and require corrective actions.
- **Training & Awareness:** Employees and contractors are sensitized about prohibitions on child and forced labour, including observance of Anti-Child Labour Day.

Legal & Standards Alignment

This policy aligns with:

- The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986
- The Bonded Labour System (Abolition) Act, 1976
- Section 370 of the Indian Penal Code
- The ILO Declaration on Fundamental Principles and Rights at Work

Discrimination and Harassment

Non-Discrimination, Harassment & Abuse Policy:

ANJ Turnkey Projects Pvt. Ltd. maintains a zero-tolerance approach to all forms of workplace discrimination against sex, color, religion, region language etc., harassment, and abuse. We are committed to fostering a respectful, inclusive, and safe work environment for all employees, contractors and stakeholders.

Scope: Applicable to all individuals employed by or representing ANJ Group in any capacity.

Objective:

- To ensure a workplace free from discrimination, harassment and abuse.
- To promote equal treatment, fairness and respect for all employees.
- To provide safe mechanisms for reporting and addressing grievances without fear of retaliation.

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Targets:

- To provide equal treatment, fairness and respect for all employees irrespective of the position engaged.
- Ensure 100% of employees participate in awareness training on discrimination and harassment by 2028.

Responsibility: HR Department.

Monitoring and Review:

Implementation of this policy is monitored through training participation records, grievance reports and periodic internal audits. Anonymous reporting mechanisms and employee feedback surveys are reviewed regularly to ensure effectiveness. The HR Department, supported by POSH Committees and Senior Management, reviews outcomes to drive continual improvement.

- **Equal Opportunity Practices:** Recruitment, promotion, training and employment conditions are merit-based and free from discrimination on any grounds.
- **Awareness & Training:** All employees undergo periodic training on workplace conduct, diversity and non-discrimination. Awareness sessions reinforce zero tolerance for harassment and abuse.
- **Grievance Redressal:** Employees can raise concerns through confidential and anonymous reporting channels without fear of retaliation. A Grievance Redressal Committee reviews and addresses complaints promptly.
- **POSH Compliance:** Cases of sexual harassment are addressed under ANJ's dedicated POSH Policy, in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, through Internal Committees established at all locations.
- **Governance & Accountability:** The HR Department, POSH Committees and Senior Management oversee the effective implementation of this policy and take disciplinary action against violations.

Diversity, Equity and Inclusion – DEI Policy:

ANJ Turnkey Projects Pvt. Ltd. is committed to a workplace that values diversity, ensures equity and fosters inclusion. We treat all individuals with dignity and respect and provide fair opportunities to thrive, regardless of gender, age, caste, religion, ethnicity, disability, sexual orientation, marital status or any other characteristic.

Scope: Applicable to all individuals employed by or representing ANJ Group in any capacity.

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Objective:

To promote the representation and participation of diverse groups and individuals in the workplace. DEI at ANJ encompasses people of different ages, races, ethnicities, abilities, disabilities, genders, religions, cultures, and sexual orientations however preference will be given to the local talent and workforce.

We believe DEI is vital to creating and maintaining a successful workplace where all people can thrive personally and professionally. Bringing together people of varied backgrounds leads to new and creative ideas.

Targets:

To foster a culture of respect, fairness and inclusion across all levels of the organization. Establish gender balance targets in recruitment and leadership roles and ensure 100% of employees undergo DEI awareness training by 2028.

Responsibility: HR Department.

Monitoring and Review:

Training participation records, employee engagement surveys and grievance reports are reviewed regularly to assess progress. The DEI framework is updated as needed to reflect evolving laws and workplace best practices.

- ANJ provides equal opportunities irrespective of gender, religion, caste, ethnicity, sexual orientation, disability, age, colour, marital status or any other characteristic.
- Hiring and promotion practices are merit-based, aligned with the Equal Remuneration Act, 1976, the Rights of Persons with Disabilities Act, 2016 and relevant labour laws by following equal pay for equal work.
- Employees from marginalized groups provide fair access to training, mentoring and career development.
- Respect for religion and cultural practices is ensured, including reasonable accommodation of beliefs and traditions.
- Differently abled employees are treated with dignity and necessary facilities are provided to prevent undue hardship.
- ANJ does not tolerate racial harassment, derogatory remarks or discriminatory behaviour of any kind.
- Contractors and suppliers are expected to uphold the same standards of diversity, equity and inclusion at ANJ workplaces.
- Political neutrality is maintained, ANJ does not support any political party or candidate and employees' political beliefs remain personal.
- All employees are responsible for the practical application of this policy in their daily activities. Non-compliance will be treated seriously.

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Freedom of Association & Collective Bargaining Policy:

ANJ Turnkey Projects Pvt. Ltd. recognizes and respects the right of all employees to freedom of association and collective bargaining. We are committed to constructive social dialogue, fair representation and non-retaliation, ensuring that employees can freely raise and resolve workplace concerns through recognized representatives.

Scope: Applicable to all individuals employed by or representing ANJ Group in any capacity.

Objective:

- To respect employees' right to form and join trade unions, associations or work groups of their choice.
- To engage in good faith dialogue and collective bargaining with employee representatives.
- To ensure employees can exercise these rights freely, without retaliation, harassment or discrimination.

Targets:

- Build constructive relationships with employees and their representatives through structured dialogue.
- Maintain the number of employees covered by a collective bargaining agreement at 100% by 2030.

Responsibility: HR Department and Employee Representative.

Monitoring and Review:

Meeting records, grievance reports, and employee feedback are periodically reviewed to evaluate the effectiveness of social dialogue.

- Provide mechanisms, time, training and resources necessary for participation
- Employees are free to join or establish unions, associations or elected work groups, and to participate in collective bargaining, in line with the Trade Unions Act, 1926 and other applicable labour laws.
- Employee representatives are recognized and given access to their members in the workplace.
- Determine and remove obstacles or barriers to participation.
- ANJ does not interfere with the establishment, functioning or administration of workers' organizations.
- Issues raised are addressed in good faith through dialogue and fair negotiation.
- Grievance mechanisms are available to ensure concerns are addressed promptly and fairly.
- Where employee committees (e.g., health & safety, welfare, workplace forums) exist, ANJ supports their effective functioning.

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Sustainable Procurement Policy

At ANJ Turnkey Projects Pvt. Ltd., we are committed to building a sustainable and resilient supply chain that minimizes environmental impacts, safeguards human rights, and fosters ethical and inclusive business practices. We recognize that our responsibility extends beyond our own operations and into the activities of our suppliers and contractors. Therefore, we actively integrate Environmental, Social and Governance (ESG) principles into our procurement processes to drive sustainability across the value chain.

Scope

This policy applies to all procurement activities, contractors, subcontractors, and suppliers engaged with ANJ Group.

Objectives

- To ensure that all suppliers and contractors uphold the highest standards of environmental protection, social responsibility, and ethical conduct.
- To identify, assess, and mitigate adverse environmental and social impacts within the supply chain.
- To embed ESG considerations into procurement decisions, supplier selection, and ongoing supplier management.
- To create shared value by collaborating with suppliers to continuously improve sustainability performance.

Commitments

ANJ shall:

- Require all suppliers to comply with ANJ's Supplier Code of Conduct, which integrates ESG standards covering environment, labor rights, ethics, governance, and responsible sourcing.
- Include ESG clauses with defined consequences (such as corrective action, suspension, or termination) in all purchase orders and supplier contracts.
- Conduct periodic ESG assessments and audits of suppliers to verify compliance and identify opportunities for improvement.
- Provide capacity building and sustainability training to suppliers and contractors, which must be attended as part of ongoing qualification.
- Encourage suppliers to reduce their own environmental footprint, including emissions, water use, waste generation, and hazardous material handling.
- Ensure suppliers demonstrate strong social practices, including fair wages, safe working conditions, freedom of association, diversity and inclusion, and zero tolerance for forced or child labor.

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Targets

- By 2028, ensure all purchase orders and vendor contracts include Environmental and social clauses covering environmental and labour requirements.
- By 2030, achieve full supplier alignment with ANJ's sustainability and carbon neutrality goals through screening, engagement, and performance monitoring.

Monitoring & Review

- The Procurement and Sustainability teams will jointly track supplier ESG performance through audits, self-assessments, and reporting.
- Suppliers found in non-compliance will be required to implement corrective action plans within defined timelines.
- Repeat violations or refusal to engage in ESG compliance will result in contract suspension or termination.
- Annual reviews will ensure alignment with evolving ESG regulations, client requirements, and stakeholder expectations.

Implementation Measures

- Procurement Planning: Sustainability, cost and market needs are considered during planning to ensure responsible and efficient sourcing.
- Supplier Onboarding: All new suppliers must sign the Supplier Code of Conduct with embedded ESG requirements.
- Supplier Selection: Suppliers are evaluated category wise based on quality, price, ESG compliance, and performance before approval.
- Purchase Orders & Contract Management: ESG compliance clauses are included in all purchase orders and vendor contracts, with explicit consequences for violations.
- Training & Capacity Building: ANJ conducts regular sustainability and ESG awareness sessions, which are mandatory for all suppliers and contractors to strengthen responsible sourcing practices.
- Audits: Periodic ESG performance audits and surprise checks are conducted, with results tracked on a supplier's sustainability scorecard.
- Collaboration: Work with suppliers to co-develop innovative, low-carbon, and circular solutions for materials, products, and services.

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