



HUMAN RIGHTS POLICY

OF

APOLLO PIPES LIMITED

Version	Revision Date	Approved by	Date of Approval
1st Version		Board of Directors	25.07.2023
2nd Version	26.10.2023	Board of Directors	26.10.2023

1. Objective

At Apollo Pipes Limited ('the Company'), we are committed to the principles of sustainable development including protecting human rights, respecting the dignity, well-being and worth of the employees and business partners.

The Company is committed towards its social responsibilities as a direct and indirect employer, and respecting the human rights of all our stakeholders.

Apollo Pipes' Human Rights policy is in alignment with the United Nations Global Compact, reaffirming the company's dedication to creating a fair and equitable workplace that ensures the well-being and equal rights of all.

2. Scope and Applicability

We are committed to respecting the fundamental rights of all people directly or indirectly related to our business which includes our employees, business partners and communities where we operate.

3. Principles of the Policy

a. Gender Pay Equality

Be compliant with all the relevant and applicable Central and State labour laws, rules and regulations and ensure that our employees and business partners are fairly and reasonably paid, and remuneration structure is compliant with statutory obligations of the jurisdictions in which we operate.

b. Working conditions

Promote fair working environment and uphold human rights aligned with national laws, regulations and international standards and conventions.

c. Human Right Violations

Do our utmost to avoid being complacent with adverse human rights impacts including benefitting from the human rights violations caused by others. Forced and Child Labour;

Have zero tolerance for any form of forced, compulsory or child labour either directly or through business partners.

d. Human Dignity

Be an equal opportunity employer and treat all employees with respect and dignity and judge solely on their performance irrespective of their race, religion, caste, gender, sexualorientation, age, or disability.

e. Equal Opportunity and Non-Discrimination

Respect and preserve the culture and heritage of local communities, including socially vulnerable groups which are impacted by our operations and work towards developing a constructive

relationship with such groups. Work with Government agencies to develop a common understanding and agreement to protect human rights in the event of unforeseen situations while protecting our people, equipment and assets.

f. Occupational Health and Safety

We are committed to focusing on the holistic well-being and fitness of all employees. We provide continuous support for initiatives that promote a healthy lifestyle and the physical and mental well-being of our employees. We have in place various practices and policy measures to ensure a safe and healthy workplace.

g. Modern Slavery

We have a zero-tolerance policy towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organizations relating to forced or compulsory labour. The Company commits to treating all employees and everyone related to its operations with dignity, respect and nurturing an environment of fairness, transparency, and trust.

h. Freedom of Association

Respects the right of employees to exercise free association, participation and provides access to appropriate redressal mechanisms.

i. Harassment Free Workplace

We have zero-tolerance for harassment, intimidation, or humiliation of any kind in the workplace, whether sexual, physical, virtual, verbal or psychological.

j. Fair Compensation

The Company ensures that all employees are paid adequately as per the governing laws. We always strive to ensure that our employees are paid in line or higher than the minimum wages prescribed by law.

4. Our Commitments

- Continue compliance with applicable constitutional and regulatory human rights requirements;
- Align existing practices and business operations with our commitments to respect human rights;
- Continue to improve human rights performance by sharing good practices and learnings;
- Promote human rights awareness at all levels through mandatory training sessions;
- Prohibit contributions to armed conflicts or any other disputes that has the potential to violate human rights;
- Ensure compliance with all existing local, state, and national laws to guarantee equitable payment of wages to all without discrimination;
- Ensure fair compensation for all by adhering to regulatory norms;
- Zero tolerance towards any form of discrimination, child labour, and forced labour;
- Collaborate with local communities to safeguard and honor the cultural and heritage values of indigenous communities in the regions where our business operates;
- Treat all employees and workers with utmost dignity and respect;

- Maintain a strict policy against any form of workplace harassment, intimidation, or humiliation, including but not limited to sexual, physical, verbal, or psychological misconduct;
- Ensure equal access to health care within the company for all employees and workers;
- Creating unambiguous accountability through the allocation of sufficient resources and roles for the efficient management of human rights risks; and
- Appreciating diversity, promoting equal opportunities, and recognizing the importance of safeguarding the rights of vulnerable populations, including indigenous communities, women, migrant laborers, and other minority groups.

5. Grievance Redressal Mechanism

Every staff member is encouraged to confidentially report their concerns using our Whistleblower Policy. These concerns should be based on facts and include as much pertinent information as possible to facilitate their evaluation and investigation. An Ombudsperson will receive and document all complaints. As per our Whistleblower Policy, information regarding these complaints will only be shared with employees or third parties when necessary for the investigation. Any breaches of this policy will result in suitable disciplinary actions being taken.

6. Governance

The Company shall implement this policy as per the prevailing standards. This policy is overseen by the Company's Board of Directors. Business leaders will be responsible for human rights related performance and line managers shall be responsible for the full implementation of the related human rights standards.

7. Reporting

The Company shall measure and transparently disclose all the Human Rights Related metrics in accordance with globally recognized frameworks.

8. Review

The content and implementation of this policy will be reviewed periodically.