

GHCL LIMITED

BRSR POLICY – 5: POLICY ON HUMAN RIGHTS




GHCL LIMITED
NOIDA





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BRSR POLICY – 5: POLICY ON HUMAN RIGHTS

[Regulation 34(2) (f) of SEBI Listing Regulations, 2015)

1. Philosophy:

GHCL Limited respects and promotes human rights for all individuals. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by business activities before or if they occur through human rights due diligence and mitigation processes.

GHCL Limited recognizes its impact on the communities in which it operates. GHCL Limited is committed to engaging with stakeholders in those 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. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

2. **Scope:** This Policy is applicable to all the business divisions of the GHCL Limited.

3. Policy:

- i. The company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.

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- ii. The company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
- iii. The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- iv. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy.

4. Implementation:

- i. The Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's intranet.
- ii. The Managing Director, through the Human Resource Department along with Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the Policy is implemented throughout the Company.
- iii. ~~Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis.~~
- iv. Any grievances/ complaints with respect to violation of the Policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of the Policy to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.

5. General:

- i. In case of any doubt with regard to any provision of the Policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.





- ii. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of Policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.

6. Modification / Amendment in the Policy:

Any or all provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.

7. Change Log:

1.	Type of Document	Policy
2.	Recommended by Audit & Compliance Committee	May 20, 2017
3.	Approved by Board of Directors	May 20, 2017
4.	Reviewed by the Managing Director	April 1, 2024
5.	Document Control	Corporate Secretarial

For GHCL Limited


R S Jalan
Managing Director

