



Policy on Human Rights & Diversity, Equity & Inclusion

Document No. IMS/Policy/Social/05

Issue Version: 1.1

1. Background

AGEL is committed to upholding of fundamental human rights in line with the legitimate role of business. Our approach includes adherence to corporate business policies and compliance with applicable laws including internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labor Organization's declaration on Fundamental Principles and Rights at Work.

Respect refers to the fact that AGEL will make reasonable efforts to prevent our activities from causing negative impacts on human rights or communities and, if they occur, will endeavor to mitigate, or repair the impact.

We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other category protected by applicable law.

AGEL is committed to delivering value through equality and to nurture and promote human diversity across its operations. We consider diversity to be an important driver of innovation, productivity, and growth.

We promote an inclusive work culture of creating a supportive professional environment that promotes trust, empathy, and mutual respect.

2. Purpose/Objectives

To provide guidelines for fostering Human Rights values and ensuring adherence to Human Rights Principles.

The policy strives for the protection and development of human rights at all levels.

The Policy reveal the commitments towards Diversity, Equity & Inclusion.

3. Scope

This Section of Policy on Human Rights will be applicable to all stakeholders including employees, associates, customers, vendors, contractors, etc and Section on Diversity, Equity & Inclusion will be applicable to relevant stakeholders including employees, associates, contractors etc.

4. Reference Documents

The Policy on Human Rights draws its inspiration from the following seminal works/documents

- a. The Universal Declaration of Human Rights
- b. Social Accountability 8000 (SA8000) Standard
- c. The 2 main Covenants (Civil & Political Rights; Economic, Social & Cultural Rights)
- d. International Treaties & Conventions related to Human Rights

- e. National Guidelines on Responsible Business Conduct and Principles of Business Responsibility and Sustainability Report

5. The Construct of Human Rights

Whereas each organization or entity has a different approach towards Human Rights, in general the construct of Human Rights shall be around the following elements:

- a. **Principles:** Respecting the principles of dignity, liberty, equality, and brotherhood of all people
- b. **Applicability:** In the organizational context this comprises all stakeholders including employees, associates, customers, vendors, contractors, etc.
- c. **Rights at different Levels:** Individual Rights such as the Right to Life and Liberty, Individual Rights towards the Community; Social, Economic and Cultural Rights, etc.
- d. **Freedoms:** such as the Freedom of Speech and Religion; Freedom from Fear and Want
- e. **Duties and Reasonable Restrictions on Rights and Freedoms:** Each Right or Freedom comes with an attached Duty and Responsibility. It is incumbent on each individual stakeholder ensure that their Rights and Freedoms are aligned with the Business Needs and Direction of the Organization, and it is understood that there may be reasonable restrictions imposed on the Rights and Freedoms through stated policies and a Governance framework for the organization.

The commitment towards Diversity, Equality, and inclusion:

The organization shall work consistently to ensure that the workplace is not only welcoming for all genders, ethnicities, backgrounds, age, caste, religion, marital status, color, state/ location, sexual orientation, language, and disabilities but that people are also treated with equality and respect.

AGEL is continuously striving to be an equitable workplace promoting pay parity, skill balancing, inclusive culture and of diverse demography, free from any unfair treatment or unlawful discrimination. This applies to all employee policies and processes including and not limited to

- Recruitment, selection, career progression
- Terms and conditions of employment
- Working environment
- Training and development
- Redundancy and re-deployment

We strive to provide a diverse and inclusive workforce where each individual feels valued and empowered. Individuals with different backgrounds, skills, attitudes and experiences bring fresh ideas and perspectives to AGEL. As a diverse organization, AGEL seeks to encourage and harness these diversities and make our services innovative, relevant and accessible.

6. Policy: Human Rights

- a. It is the duty of all Individuals including functions and departments within the AGEL to actively support and foster Human Rights amongst all stakeholders.
- b. Recognize our responsibility to respect human rights, avoid complicity and actively seek to prevent abuse of human rights and remedy the impact of any violations with respect to Human Rights.

- c. Employees, agency staff, vendors, customers, and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- d. Ensure compliance and adherence to all the applicable human rights laws, and all legal provisions including rules and guidelines, The Universal Declaration of Human Rights, Social Accountability 8000 (SA8000) Standard, The 2 main Covenants (Civil & Political Rights; Economic, Social & Cultural Rights), International Treaties & Conventions related to Human Rights, National Guidelines on Responsible Business Conduct and Principles of Business Responsibility and Sustainability Report.
- e. Identify and assess, through a process of due diligence or otherwise, any potential risks or adverse impact with respect to Human Rights Policies, especially those that will tarnish the brand and image of the organisation with respect to its commitment to championing Human Rights.
- f. Ensure that our employees have access to communication and reporting channels that allow them to notify AGEL of situations of possible impacts on their rights.
- g. Commit to create a workplace that is free from human trafficking and slavery for its employees and all other stakeholders with whom it does business. For the purposes of this policy, this includes forced labor and illegal child labor. Human trafficking or slavery will not be tolerated or encouraged in any part of our organization, and all stakeholders must abstain from any practice that constitutes human trafficking or slavery.
- h. Commit to pay equal remuneration to men or women working in the same position and similar capabilities and not make discrimination against female employees in the matters of transfers, training, and promotion etc.
- i. Treat everyone who works for AGEL fairly and without discrimination. Respecting the human rights of our customers.
- j. Foster a culture of respecting human rights, promote specific training and awareness and realization in active involvement of human rights and implement tools to our all employees/contractual employees and value chain partners on yearly basis to prevent the infringement of these human rights.
- k. We shall incorporate and review Human Rights policy requirement in all our business agreements and contracts with third party partners and will establish a process to avoid complicity with adverse human rights impacts pertaining to the previous year.
- l. We will make sure that the grievance committee's stakeholder groups are aware of the grievance mechanisms for human rights issues on a yearly basis and will keep track of the number of stakeholders who report human rights related grievances and/or complaints, as well as the cases received and pending for resolution during the year.
- m. We are committed to take remedial action to eliminate complicity with adverse human rights impacts, as well as to modify/introduce business processes for addressing human rights grievances/complaints.
- n. AGEL respects freedom of association and right to collective bargaining and workplace security and safety
- o. AGEL Management has the discretion to review, amend and change the policy once in every two years.

Diversity, Equity and Inclusion

The Diversity, Equity and Inclusion (DEI) policy provides a strategic framework for monitoring and improving the organizational capabilities to

improve representation and promote a more inclusive culture in accordance with the Rights of Persons with Disabilities Act, 2016. All our businesses must demonstrate a commitment to the following principles:

- a. To comply with all applicable government regulations that seek to protect and promote diversity in professional activities.
- b. To Promote Diversity, Equity and Inclusion in all its HR actions like recruitment, compensation, promotions, career growth, performance, etc.
- c. Encouraging stakeholders to inculcate the principles of Diversity, Equity, and Inclusion in all its stakeholders such as Vendors, Partners, Contractors, etc.
- d. To support and empower differently abled individuals in the professional journey by providing accessibility support.
- e. The policy encourages respectful communication and cooperation amongst all employees.
- f. To provide adequate flexibility to accommodate employees' varying needs without any discrimination by the respective authorities in the organization.
- g. To develop holistic training programs for new employees to accelerate their alignment with the organization culture, values, the company mission, and vision.
- h. The organization shall appoint a Review Committee which will monitor the necessary parameters to ensure that Diversity, Equality, and Inclusion (DEI) principles are being deployed in the right spirit. The review committee shall also make appropriate reports and presentations wherever required.
- i. The organization takes allegations of discrimination, harassment and bullying seriously and ensure they are appropriately investigated.

7.0 Reporting inappropriate Conduct:

- i. If any employee believes that they or another individual has been treated unfairly or has been discriminated against on account of any of the parameters mentioned in this policy or its intent, the employee is urged to bring this to the notice of DEI Safeguard Forum
- ii. All reported incidents will be investigated with an effort to keep the source of the report confidential, with the disclosure of information as appropriate to facilitate the investigation or resolution of the matter
- iii. AGEL encourages employees to report in good faith any possible violation of this Policy
- iv. The organization will not tolerate threats or acts of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this policy or in good faith provide information in connection with a report or investigation of any such conduct.
- v. Any employee found to have exhibited any inappropriate conduct or behavior against others will be liable to disciplinary action.

Grievance Redressal

Stakeholders can raise concerns pertaining to human rights issues as per Whistleblower Policy or by using online grievance management system available on Company website/HRMS or by directly reaching to the Grievance redressal team through dedicated email whistleblower@adani.com.

8.0 Periodic Review and Evaluation:

Our Board of Directors will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy, and effectiveness. Our Company reserves the right to vary and/or amend the terms of this Policy from time to time. AGEL Management has the discretion to review, amend and change the policy once in two years.



**Amit Singh
CEO, AGEL**