

APL Apollo Tubes Limited

Human Rights Policy

1. Purpose

At APL Apollo Tubes Limited, we uphold the values of sustainable development, encompassing the protection of human rights, the promotion of employee well-being and dignity, and the assurance of equal rights for all individuals. This policy outlines our collective commitment to respecting human rights and preventing any violations. Our policy is in alignment with global frameworks namely SA8000, United Nations Guiding Principles on Business and Human Rights, Principles of the UN Global Compact, and Universal Declaration of Human Rights (UDHR).

2. Scope and Applicability

This policy is applicable to all employees of APL Apollo and its subsidiaries. Additionally, we are committed to respecting the fundamental rights of all people directly or indirectly related to our business across the value chain.

3. Principles of the Policy

Gender Pay Equality and Living Wage

We adhere to all pertinent central and state labor laws, rules, and regulations to guarantee that our employees receive fair and equitable compensation, irrespective of race, religion, caste, gender, or age. The company ensures that all employees receive sufficient compensation to sustain a decent standard of living. We consistently aim to ensure that our employees are compensated at or above the legally mandated minimum wages.

Working Conditions

We ensure the right to fair compensation and comply with all applicable laws related to payment of wages, working hours and compensatory off.

Forced and Child Labour

We maintain a strict policy of zero tolerance towards any instances of forced or compulsory labor, whether within our own operations or through our business partners. We strongly oppose the exploitation of child labor (defined as individuals below the age of 18) in any form of work that is detrimental to their mental, physical, social, or moral well-being. We uphold the right of all workers to enter and leave employment of their own free will and do not endorse any form of compulsory or forced labor.

Community Engagement

We are dedicated to engaging with, preserving, and respecting the culture and heritage of local communities, particularly socially vulnerable groups affected by our operations. We strive to build positive relationships with local communities, actively working to minimize and mitigate the impact of our business operations. We support various initiatives for livelihood, sustainable

development, skill enhancement, community infrastructure, healthcare, and education in the communities surrounding our facilities.

Equal Opportunity and Non-Discrimination

We operate as an equal opportunity employer, ensuring that all employees are treated with the highest level of respect and dignity throughout their employment, including in recruitment, training, promotion, compensation, termination, or retirement processes. Our goal is to foster an inclusive workplace that embraces diversity, welcoming employees from various backgrounds and perspectives to contribute freely and fairly. We do not discriminate based on race, religion, caste, gender, or age. Employee selection and advancement are based solely on their ability to fulfill their roles and responsibilities and their performance. APL Apollo maintains a zero-tolerance policy towards discrimination, harassment, intimidation, and any other unsafe or disruptive behavior across our operations and value chain.

Occupational Health and Safety

APL Apollo is dedicated to prioritizing the overall well-being and safety of our employees, continuously striving to enhance and advocate for an injury and incident-free workplace (IIF). We have implemented effective governance mechanisms, processes such as audits, training programs, and monitoring and tracking tools to ensure the health and safety of our employees. All incidents are promptly documented and investigated, and our employees are trained on workplace-related safety hazards, associated risks, and measures to mitigate these risks.

Harassment Free Workplace

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

4. Grievance Redressal Mechanism

All employees have the option to raise their concerns confidentially through the Whistleblower Policy. These concerns should be based on facts rather than speculation and include as much relevant information as possible to facilitate assessment and investigation. The Ombudsperson will receive and document all complaints. Consistent with our Whistleblower Policy, information regarding complaints will be disclosed to employees or third parties strictly on a need-to-know basis for the purpose of investigation.

In case of any violation to this policy, appropriate disciplinary action will be taken.

Ombudsperson Contact Details: -

Email:

Address:

5. Governance

APL Apollo's Human Leadership team shall implement this policy with the oversight of the Sustainability Committee, while 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.

6. Review

We will regularly monitor and report on the performance of our human rights related indicators and train employees on good practices throughout the organization. The content and implementation of this policy will be periodically reviewed.