



EPL Ltd.
(Formerly known as Essel Propack Limited)

Doc No: HR/POL/Human Rights /001	Doc. Title: Human Rights Policy			
First Issued Date: 10.10.2020	Revision No.: 01	Revision Date: 10.10.2022	Effective Date: 10.10.2022	Next Review: 10.10.2024
Applicable Location:	Applicable to all units and offices of EPL Limited			
Retention Limit	Permanent with continuous updation			

Authority	Name	Designation	Sign and Date
Author	Ms. Samali Rasaikar	Global Lead-Employee Engagement	
Reviewed By	Ms. Jaya Mohan	General Manager – Human Capital	
Approved By	Mr. Dileep Joshi	Global CHRO	

Review Details

Date	Revision Details	Page No
10.10.2020	First Release	--
10.10.2022	Policy was reviewed by the policy formulation authorities. We have reworded the policy to adhere to our standard policy format while keeping the scope, purpose, coverage and implementation details intact as per the initial policy. policy stands revised and effective for next 2 years	All

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Introduction:

EPL Ltd is committed to upholding of Human Rights in all its actions and in the manner it conducts business. We also acknowledge the importance of this in all our efforts, towards continued success and reputation of the company.

Purpose:

A General:

The purpose of Human Rights Policy (henceforth referred as Policy) is to establish and demonstrate continual implementation and commitment to Human Rights throughout all its business activities and through the entire organisation e.g., decision makers, employees, contract workers and internal stakeholders.

More explicitly this policy will facilitate as under:

- Maintaining positive legal compliance with applicable constitutional and regulatory human rights requirements
- Aligning and embedding our responsibility and commitment to respect human rights with regard to our existing policies, processes and activities across all businesses
- Promoting awareness of the human rights with employees at various levels of our operations through training and communication
- Valuing diversity, equal opportunity and the need to consider the rights of vulnerable groups such as indigenous peoples, women, migrant workers and other minorities
- Prohibiting all forms of harmful child labour, forced / trafficked labour, discrimination and harassment
- Providing access to remedy by resolving grievances in a timely and culturally appropriate manner
- Developing goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities;
- Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks; and
- Continually improving human rights performance by sharing good practices and learnings, setting and reviewing targets, and monitoring, reporting and disclosing performance
- Communication access covering all employees and periodic monitoring enables quantitative and qualitative outreach

B Background:

EPL Ltd is an Indian Public limited company having manufacturing locations in India and across globe and accordingly policy follows norms as under:

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Approved by:

Dileep Joshi
CHRO (Global)



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1. Section 177(9) of the Companies Act, 2013 (the Act) mandates the following classes of companies to constitute a vigil mechanism:
 - Every listed company
 - Every other company which accepts deposits from the public
 - Every company which has borrowed money from banks and public financial institutions in excess of ₹ 50 crore
2. EPL is signatory to United Nations Global Compact (UNCG) and also supports other International interventions as under:
 - The Universal Declaration of Human Rights (UDHR)
 - International Covenant on Economic, Social and Cultural Rights (ICESCR)
 - International Covenant on Civil and Political Rights (ICCPR)
 - United Nations Guiding Principles on Business and Human Rights (UNGPs)
 - The 10 Principles of the United Nations Global Compact
 - Sustainable Development Goals 2030
 - The International Labour Organization's (ILO's) Fundamental Conventions
 - The Organisation for Economic Cooperation and Development's (OECD's) Guidelines for Multinational Enterprises
 - Convention on the Rights of the Child
 - Convention on the Rights of Persons with Disabilities

Scope:

This policy applies to all EPL Ltd offices, manufacturing units, subsidiaries and business activities. All officers and employees, including executives, permanent staff and contract staff, shall know, understand, and comply with the provisions contained in the policy. In addition, EPL Ltd will continue to encourage all stakeholders related to EPL Ltd business, including customers, suppliers, third parties with which EPL Ltd collaborates or invests, agents, brokers, subcontractors, and local communities to support this policy and work together to promote respect for human rights.

This policy covers major human rights adherence areas as under:

- No Child Labor
- No Forced Labor and Human Trafficking
- Non- discrimination or harassment
- Diversity and Inclusion
- Working Conditions and Labour Relations
- Work Hours, Wages and Benefits
- Workplace grievances and redressal mechanism
- Freedom of Expression, Association and Collective Bargaining
- Community and Stakeholder Engagement

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No Child Labor:

- EPL Ltd., prohibits the hiring of individuals that are under 18 years of age.
- Please refer to EPL's Policy on No Child Labour & Child Labour Remediation for further details.

No Forced Labor and Human Trafficking

- EPL Ltd, prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.
- Please refer to EPL's Policy on No Forced Labour for further details.

Non- discrimination or harassment:

EPL Ltd:

- Works to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law
- Does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind
- Basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience
- Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace
- Please refer to EPL's Policy on Diversity & Inclusion, Non Discrimination and Non Harassment for further details.

Diversity and Inclusion:

EPL Ltd:

- Values and advances spirit of diversity and inclusion of the people with whom we work
- Extends and is committed to equal opportunity and are intolerant of discrimination and harassment
- Please refer to EPL's Policy on Diversity & Inclusion, Non Discrimination and Non Harassment for further details.

Safe and Healthy Workplace:

- At EPL Ltd safety and health of the employees is of paramount importance
- The policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements
- Provide and maintain a safe, healthy and productive workplace, in consultation with the employees, by addressing and remediating identified risks of accidents, injury and health impacts
- Please refer to EPL's Policy on Working Conditions & Labour Relations for further details

Workplace Security

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- EPL Ltd., is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats
- Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity
- Please refer to EPL's Policy on Working Conditions & Labour Relations for further details

Work Hours, Wages and Benefits

EPL Ltd.:

- Compensates employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements
- Ensures full compliance with applicable wage, work hours, overtime and benefit laws
- Please refer to EPL's Policy on Working Conditions & Labour Relations for further details

Workplace grievances and Redressal mechanism:

- EPL Ltd has a clear, transparent, quick, robust and confidential grievance redressal system which effectively helps to manage workplace conflicts and potentially go a long way in bringing harmony at all EPL Ltd locations.

Freedom of Expression, Association and Collective Bargaining

EPL Ltd respects employees' rights:

- To join, form or not to join a labor union without fear of reprisal, intimidation or harassment
- To associate or not associate and seek representation, to bargain or not bargain collectively in accordance with local laws
- Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.
- Please refer to EPL's Policy on Working Conditions & Labour Relations for further details

Community and Stakeholder Engagement:

- CSR department of EPL Ltd engages with local communities on issues related to the betterment of life in every respect
- Extend support on waste management

Awareness of the Human Rights Policy:

EPL Ltd.,

- Ensures employees are aware of the Human Rights Policy through various modes of internal communication, such as induction, awareness sessions, emailers and posters
- Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with the company through the 'Speak Up' system (formal IT platform set up for this purpose)

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- Employees can also report suspected policy violations through the Focused Group Discussions, Works Committee, or Grievance Redressal Mechanism Every employee can access the Speak Up portal through common ids and computers provided at the shop floor at each Unit.
- No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.
- This policy and related information can be found on the Company's intranet site.

Communication, Responsibility and Accountability and Monitoring Process:

Communication:

Stakeholder's communication is undertaken from time to time (for ex. Employees – induction and every year through training, vendors and supply chain at the time of initial engagements)

Communicate the policy internally and externally and stipulate expectations: on website / portal

EPL Ltd., human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of company's Annual Report and Annual Sustainability Report. This reporting covers cross references the UN Guiding Principles Reporting Framework, GRI and SDGs

Responsibility and Accountability:

- Regional HR Heads and Location Human Capital Team
- Human Rights Committee (comprising of the Global CHRO, Regional HR Head, Local Unit Head)

Monitoring Process:

- Agenda and discussion during Works Committee Meetings and Focused Group Discussion (FGD) which are conducted monthly and/or quarterly
- A formal report should be forwarded to the Human Rights Committee on a six monthly basis
- All employees, supervisors and staff are extended adequate information and training on the subject. Anyone who has doubt about a potential likelihood of human rights violation incidence in spite of all precautions is expected and should report the same immediately through the Speak Up Portal
- Communication about the policy is covered through different channels of internal communication such as – induction, awareness sessions, emailers, internal magazine etc. to ensure 100% employee awareness

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