

EPL Ltd.

(Formerly known as Essel Propack Limited)

Doc No: HR/POL/DIVERSITY /001	Doc. Title: Diversity & Inclusion, Non Discrimination and Non Harassment Policy			
First Issued Date: 10.10.2020	Revision No.: 03	Revision Date: 1.01.2026	Effective Date: 15.01.2026	Next Review: 1.01.2028
Applicable Location:	Applicable to all units and offices of EPL Limited			
Retention Limit	Permanent with continuous updation			

Authority	Name	Designation	Sign and Date
Approved By	Ms. Sonal Jain	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
1.1.2024	Authorized signatory updated as new Global CHRO. Policy Objectives and Measures updated	All
01.01.2026	Scope of Applicability updated to include Thailand. Review cycle dates updated. Policy reviewed and reaffirmed..	1,2.

Table of Contents

1	Introduction	2
2	Purpose	2
3	Scope	2
4	Review	3
5	Policy objectives	3
6	Policy measures	4
7	Discrimination, harassment and bullying Addressal Procedure	5
8	Communication	6
9	Responsibility and Accountability	6
10	Monitoring Process	7

Diversity & Inclusion, Non-Discrimination and Non-Harassment Policy

GRI 405: 103-1, 103-2, 103-3

GRI 406: 103-1, 103-2, 103-3

HR/POL/DIVERSITY/

Issue Date: 10.10.2020

Review No.: 03

Review Date: 1.01.2026

1 Introduction

EPL does not engage in or support activities that would interfere with an employee's right to exercise, or to meet needs relating to gender, race, caste, national origin, religion, disability, sexual orientation, union membership or political affiliation. EPL does not allow behavior from its employees that is discriminative or harassing in nature. Gestures, language, and physical contact that are sexually coercive, threatening, abusive or exploitive are prohibited

2 Purpose

The purpose of this policy is to provide information and guidelines regarding the prevention of discrimination, harassment and bullying at EPL. The organization is committed to ensuring that all its employees are treated with dignity and respect, and that they treat others in the same way. The company believes that all colleagues have the right to work in an environment which is free from any form of discrimination, harassment, and/or bullying. This applies both in the workplace and outside the workplace in a work-related context, such as on business trips, customer or supplier events, or work-related social events. Additionally, this policy provides an overview of all objectives and measures regarding discrimination and harassment prevention.

3 Scope

EPL operates globally and is dedicated to upholding these principles across all its locations, including India, Egypt, China, Philippines, Thailand, Poland, Germany, United States, Brazil, Colombia, and Mexico. This policy applies to all EPL 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.

This policy also provides an overview of all objectives and measures related to the prevention of discrimination and harassment in these countries, ensuring compliance with local and international standards.

4 Review

Policy on Diversity & Inclusion, Non-Discrimination & Non- Harassment is owned & maintained by the Global CHRO of EPL. The Policy shall be reviewed and updated when appropriate, to adapt it to changes that may arise in the business model or in the context in which EPL operates, always ensuring its effective implementation. The latest, a review shall be conducted every two years and targets shall be reviewed every year.

5 Policy objectives

Harassment and/or discrimination towards employees or any other stakeholder at EPL is considered unacceptable behavior. Anyone found to be in breach of this policy is liable to disciplinary action.

The objectives of EPL's Discrimination and Harassment Policy:

1. Comply with:
 - The Universal Declaration of Human Rights;
 - The United Nations Convention on the Elimination of All Forms of Discrimination Against Women;
 - The United Nations Convention on the Elimination of All Forms of Racial Discrimination;
 - The United Nations Women's Empowerment Principles (WEPs);
 - ILO Conventions 100 (Equal Remuneration);
 - ILO Conventions 111 (Discrimination - Employment and Occupation);
 - The International Covenant on Economic, Social and Cultural Rights;
 - The International Covenant on Civil and Political Rights;
 - WEPs (Women's Empowerment Principles);
 - International Convention on the Elimination of All Forms of Racial Discrimination;
 - Convention on the Elimination of All Forms of Discrimination against Women;
 - Convention on the Rights of Persons with Disabilities;
 - The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013–India Specific:
 - Rights of Persons with Disabilities Act, 2016 and Rules – India Specific;
 - Comply with all other relevant local laws and regulations on discrimination and harassment
2. Ensure no involvement in or support for discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national, territorial, or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other condition that could give rise to discrimination;
3. Stay committed to create and maintain a diverse and inclusive workplace where individuals from all backgrounds, identities, and perspectives are valued and respected.
4. Continue to believe that a diverse workforce brings different viewpoints, ideas, and experiences that foster innovation, enhance creativity, and contribute to the overall success of the organization.
5. Zero tolerance for any behavior that is threatening, abusive, exploitative, or sexually coercive, including gestures, language, and physical contact, in the workplace and, where applicable, in residences and other facilities provided by the company for use by employees.
6. Never subject employees to pregnancy or virginity tests under any circumstances. Support discrimination monitoring and prevention initiatives.
7. Ensure employees are educated about the contents of this policy and the topic in general.
8. Have **zero** reported incidents of discriminatory, intimidating, and harassing behavior every year.
 - Have an **80% or higher** rate of employees who have received training annually on preventing discrimination, harassment, and human rights violations.
 - Have **25%** top management positions filled by women by 2030.
 - Have **>100 Persons with Disability** working with EPL Globally by 2030
 - Have 32% women employees by 2030

6

Policy Measures

With the following measures, EPL strives to achieve its objectives:

- EPL's Management Team is responsible for ensuring a safe working environment free from bullying, discrimination and harassment as described in this policy and must strive for zero incidents of discriminatory, intimidating and harassing behavior every year.
- EPL's management team is responsible for implementing a zero-tolerance culture towards discrimination and harassment, by openly discussing topics related to a safe workplace during bi-annual flow meetings. When a potential violation is reported or identified, managers initiate a confidential and thorough investigation, ensuring that all parties involved have the opportunity to share their perspectives. Throughout the process, clear communication and strict adherence to established policies and legal requirements are paramount. Based on the findings, appropriate corrective actions are taken, which may include disciplinary measures, training, or other interventions aimed at preventing future incidents. This approach not only reinforces EPL's commitment to a respectful and inclusive work environment but also ensures accountability at every level of the organization. In case of an incident, the manager is also expected to openly condemn discriminating behavior and take appropriate action to prevent the incident from happening again.
- EPL's Human Capital (HC) Department is responsible for providing all new employees with the Internal Code of Conduct and ensure employees sign for receipt. This Code describes the way EPL employees are expected to behave and the basic rules that must be followed to prevent situations where employees feel discriminated, intimidated, humiliated or (sexually) harassed. Any adjustments or additions to this Code of Conduct must be communicated within 3 months of the adjustment or addition.
- EPL employees, interns & contractors must complete the online mandatory Discrimination and Harassment Awareness Training course and Human Rights Awareness Training course within the first 3 months of employment or within first 3 months of publishing a new mandatory course.
- HC departments at EPL's production sites are responsible for having informal and formal complaints procedures in place, such as an extensive Whistleblowing procedure and Grievance Procedure to enable employees to report misconduct related to discrimination and harassment.
- EPL's site management is responsible to create a workplace culture that promotes respect, dignity and inclusiveness for People with Disabilities employed at EPL. Encourage open communication and ensure that they are treated as integral members of the team, EPL's site management is responsible for offering sensitivity training to all employees to raise awareness of disabilities and how to work inclusively.
- EPL's site management is responsible for implementing preventive measures, such as adopting the Ethical Trading Initiatives- ETI, framework of Sedex, and performing regular risk assessments, internal audits, and evaluations on discrimination and harassment. Additionally, by implementing an additional local non-discrimination policy & communication focused on local issues if the situation calls for it.
- EPL Limited HC department is responsible for providing, in confidence, **advice and assistance to employees subjected to harassment and/or bullying** and assist in the resolution of any problems.
- EPL Limited HC department is responsible for taking action to **avoid discrimination while recruiting staff** by implementing a fair and transparent recruitment procedure, using non-discriminatory language, advertising widely, refraining from referencing characteristics like age, race or sex, and avoiding unconscious bias, both in job descriptions and in job interviews.
- The HC departments at EPL are responsible for conducting the Women's Empowerment Principles Gender Gap Analysis to **assess gender equality performance** across the workplace, marketplace, and community. The outcome of this analysis should be used to identify concrete actions to ensure gender equality.

EPL's Management Team is responsible for **ensuring gender equality** and must ensure a healthy balance between men and women. Equal rights, opportunities, and responsibilities must be ensured and promoted, with help of e.g., equal pay monitoring and fair gender division in job promotions and participation in educational programs such as Leadership Programs.

EPL HC department is responsible for annual data collection and transparently **reporting on incidents of discriminatory, intimidating and harassing behavior**, and gender and age-related labor data, such as number of employees, employee hires, promotions, turnover, and management positions. EPL's affiliates and production sites are responsible for the timely and complete delivery of data to the HC department. All data on discrimination and harassment and equality is publicly disclosed according to the Global Reporting Initiative Standard (GRI) in EPL's annual [Sustainability Report](#).

7 Discrimination, harassment and bullying Addressal Procedure

All allegations of discrimination, harassment and/or bullying will be dealt with seriously, promptly, and in confidence. Employees who feel that they have been subject to harassment and/or bullying must not hesitate in using this procedure nor fear victimization. Retaliation against an employee who brings a complaint of harassment and/or bullying is a serious disciplinary offence, which may constitute gross misconduct and could result in dismissal.

1. If you are in any doubt as to whether an incident or series of incidents, which have occurred, constitute discrimination, harassment, and/or bullying, then in the first instance you should approach your supervisor and/or HC representative on a confidential informal basis. They will be able to advise you as to whether the complaint necessitates further action, in which case the matter will be dealt with formally or informally as deemed appropriate.
2. If an incident happens, which you think may be discrimination, harassment, or bullying, you may prefer to initially attempt to resolve the problem informally, as you deem appropriate. In some cases, it may be possible and sufficient to explain clearly to the person engaging in the unwanted conduct that the behavior in question is not welcome, that it offends you or makes you uncomfortable, and that it interferes with your work. You should make it clear that you want the behavior to stop.
3. In circumstances where this is too difficult or embarrassing for you to do on your own, you could seek support from a friend at work or your HC representative or through Speak Up Platform to the Managing Director. If the incident concerns a customer or other third party, you may wish to ask your manager to intervene for you on an informal basis.
4. If the conduct continues, or if it is not appropriate to resolve the problem informally, or you are not comfortable to raise it informally, you should raise a formal complaint using the procedure set out in our Whistleblowing Procedure and Speak - up.

8 Communication, Responsibility, Authority, Accountability, and Monitoring Process: Communication and Public Reporting:

Communication:

- Stakeholder's communication is undertaken from time to time (for ex. Employees – induction and every year through training, for vendors and supply chain at the time of initial engagements)
- Communicate the policy internally and externally and stipulate expectations: on website / portal
- EPL human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of the company's Report and annual Sustainability Report.
- This reporting covers cross references to the UN Guiding Principles Reporting Framework and other interventions undertaken by EPL

9

Responsibility and Accountability

- Regional HR Heads and Country/Unit Human Capital Team
- Human Rights Committee (comprising of the Global CHRO, Regional HR Head, Local Unit Head)
- In case of sexual harassment, the Internal Committee constituted as per the country specific legal regulations

10

Monitoring Process

- Agenda and discussion during Works Committee Meetings and Focused Group Discussion (FGD) which are conducted monthly and/or quarterly and Internal Committee meetings specifically convened for prohibiting and handling sexual harassment cases.
- 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 doubts about a potential likelihood of human rights violation incidences 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.