



EPL Ltd.

(Formerly known as Essel Propack Limited)

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Retention Limit	Permanent with continuous updation			

Authority		Designation	Sign and Date
Approved By	Ms. Sonal Jain	Global CHRO	

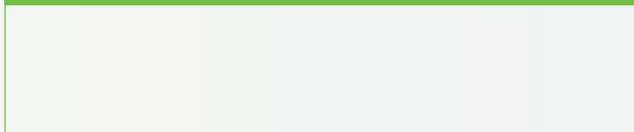
Review Details

Date	Revision Details	Page No
01.01.2026	Scope of Applicability updated to include Thailand. Review cycle dates updated. Policy reviewed and reaffirmed.	1,2

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Speak Up Policy



HR/POL/LR & WC/

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1 Purpose

EPL is dedicated to fostering a culture of transparency, inclusivity, and accountability across all levels of the organization. The Speak Up Policy serves as a cornerstone of our commitment to ethical practices, diversity, sustainability, and employee well-being. It provides employees and stakeholders with a safe and structured platform to voice concerns, suggest improvements, and report unethical behaviors without fear of retaliation. Through this policy, EPL reinforces its role as a responsible and people-centric organization, ensuring psychological safety and enabling an open dialogue that strengthens organizational integrity and trust.

2 Scope

This policy applies to all employees, interns, contractors, and other stakeholders associated with EPL Limited across its global operations. It encompasses all EPL factories and offices located in India, Egypt, China, the Philippines, Thailand, Poland, Germany, the United States, Brazil, Colombia, and Mexico. The policy ensures alignment with local laws and regulations while maintaining uniformity in its principles across all regions.

The policy ensures inclusivity and accessibility for everyone associated with EPL, enabling a collective approach to ethical practices and workplace well-being.

3 Review

Policy on Speak Up 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.

4 Objective

The Speak Up Policy aims to achieve the following measurable targets:

1. **Grievance Resolution:** Respond to 90% of grievances within 30 business days, with critical issues addressed within 10 business days to uphold responsiveness and reliability.
2. **Awareness and Accessibility:** Ensure that 75% of employees are aware of Speak Up channels through biannual surveys, reflecting consistent efforts in communication and training.
3. **Confidentiality and Safety:** Guarantee strict confidentiality for all concerns raised, achieving a benchmark of zero incidents of retaliation, ensuring trust in the reporting system.
4. **Training Coverage:** Achieve **100%** communication coverage annually for all employees on Speak Up usage and ethical practices to build awareness and competency.
5. **Engagement Growth:** Foster a culture of participation with year-on-year increases in platform usage, reflecting enhanced employee engagement and trust.
6. **Satisfaction Levels:** Maintain **90%** positive feedback from employees using the Speak Up system, ensuring continuous improvement and employee-centricity.
7. **Systemic Review:** Conduct quarterly reviews of systemic issues to drive organizational learning, improvement, and alignment with long-term goals.

5 Core Principles



1. Psychological Safety

EPL commits to providing a safe and supportive environment where employees can express their concerns without fear of judgment or retaliation. Open dialogue is encouraged, and every concern is handled with respect, sensitivity, and confidentiality.

2. Addressing Psychological Harm

The organization recognizes the importance of proactively identifying and addressing potential psychological risks, such as harassment or workplace stress. By creating a supportive ecosystem, EPL ensures that employees' mental well-being is prioritized and protected.

3. Transparency and Accessibility

The Speak Up system is designed to be intuitive, accessible, and user-friendly. EPL guarantees that employees are informed about available channels and receive regular updates on the progress and resolution of their concerns.

4. Non-Retaliation

Retaliation against individuals raising concerns through the Speak Up platform is strictly prohibited. EPL upholds a zero-tolerance approach to discrimination, harassment, or any punitive actions against whistleblowers, ensuring their protection and well-being.

5. Global Alignment

By adhering to international frameworks like the UN Global Compact, ILO conventions, and OECD Guidelines, EPL ensures that its Speak Up system aligns with global best practices and complies with ethical and legal standards worldwide.

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How to Raise a Concern

EPL provides a clear, structured process for raising concerns, ensuring simplicity and confidentiality:

Step 1: Speak to Your Manager or HR

Start by addressing the concern with your immediate manager or Unit/Regional HR team. Many issues can be effectively resolved through open dialogue at this level.

Step 2: Use Speak Up Channels

For unresolved or sensitive matters, employees can use the following Speak Up channels:

- Portal Access: Log in to Entgra Production on EP Connect, select the Speak Up option, and complete the mandatory fields.
- Email: Write to speakup.md@epglobal.com.
- Written Communication: Send letters to the MD's Office or Group CHRO at EPL Mumbai.

Step 3: Direct Escalation



For critical issues, employees can bypass earlier steps and directly contact the MD or Group CHRO to ensure timely and sensitive handling of the matter.

All concerns are reviewed by a Listening Officer, who assigns them to the appropriate committee (e.g., Whistle Blower Committee, Sexual Harassment Committee) for resolution, as per EPL's established policies.

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Governance and Oversight

1. Listening Officer

The Listening Officer acts as the first point of review for all Speak Up submissions, ensuring proper categorization and timely assignment to relevant committees.

2. Committees for Resolution

- Whistle Blower Committee: Handles fraud, corruption, and ethical violations.
- Sexual Harassment Committee: Manages harassment-related issues with sensitivity.
- Unit/Regional HR/Global CHRO: Addresses workplace grievances and concerns.

3. Monitoring and Feedback

EPL actively monitors the resolution process to ensure timeliness and effectiveness. Feedback is collected post-resolution to refine processes and enhance employee satisfaction.

4. Remediation procedure for Victims of discrimination and harassment

Operational process or evidence of remediation efforts/remediation programme to support victims of discrimination and/or harassment. Remedy is an operational-level, non-judicial process to help mitigate incidents of discrimination and/or harassment as it helps to identify and correct any harm caused to victims.

The remediation process should include

- a) identification of appropriate responses to the violation
- b) transparency in communication with stakeholders
- c) measures to monitor effectiveness of the implemented remedy.

Policies Supporting Speak Up

The Speak Up Policy is supported by EPL's comprehensive policy framework, including:

- Anti-Corruption Compliance Policy
- EPL Whistle Blower Policy
- Global Code of Conduct
- Supplier Sustainability Code of Conduct
- Diversity and Inclusion Policy
- Policy on Workplace Conditions and Labor Relations
- Policy on Sexual Harassment Prevention

Commitment to Sustainability



EPL's Speak Up Policy reflects its broader commitment to fostering an ethical, inclusive, and sustainable workplace. By adhering to global standards and empowering employees and stakeholders, EPL aims to build an organizational culture founded on trust, accountability, and continuous growth.

One EPL - Express Freely | Suggest Without Hesitation | Inform to Evolve