



HUMAN RIGHTS POLICY

OF

LLOYDS METALS AND ENERGY LIMITED

(CIN: L40300MH1977PLC019594)

Registered Office: Plot No. A 1-2, MIDC Area, Ghugus,
Chandrapur, Maharashtra - 442505

Tel. Nos.: 07172 285103 / 285398

Corporate Office: A-2, 2nd Floor, Madhu Estate,
Pandurang Budhkar Marg, Lower Parel, Mumbai 400 013

Tel. Nos.: 022 6291 8111

This Policy is effective from 16th March, 2023

1. Introduction:

The rights of our employees and people residing in the areas close to our facilities who are impacted by our operations are respected by Lloyds Metals and Energy Limited (“the Company” / “LMEL”). The standards and guidelines for respecting the rights of our employees and all other stakeholders are contained in our human rights, code of conduct, and protection of women from sexual harassment policies.

At LMEL, we make sure that every employee is treated with respect and dignity, that they have the freedom to choose when and where they work, that they are in a safe environment, and are paid fairly for their work. We take pride in providing all our full-time employees with a safe working environment, reasonable hours and pay, and benefits including healthcare and contributions to their retirement plans. LMEL does not employ or encourage the use of child labor, forced labor in any of its facilities. We work to promote respect for human rights within our spheres of influence.

2. The Scope of this policy is applicable to all the locations of LMEL.

3. Well-being:

The Company sees following steps as essential:

- a. Physical and mental health of stakeholders involved in workplaces of the Company (employees, contractors, etc.)
 - i. Making available clean, potable water in the workplace.
 - ii. Supplying protective equipment and training necessary to perform tasks safely.
 - iii. Ensure that company operations do not adversely impact long term health of individuals.
 - iv. When operating in areas where contagious diseases are endemic, providing appropriate information and training to mitigate risk.

b. Maternity related:

The Company will

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- i. Provide women with maternity leave for the period as prescribed under the Maternity Benefit Act, without risk of losing their employment or responsibilities.
- ii. Grant women temporary leave in case of illness or complication related to pregnancy or birth, without risk of losing their employment.
- iii. Paternity support to the families of recently father with some two privileged
- iv. Provide reward to employee, when body first two delivered during his and her employment.

c. Injury & illness:

This covers an individual with a temporary or permanent disability, physical or otherwise. LMEL will:

Provide emergency care as necessary.

- i. Give reasonable time to recover from the injury or illness.
- ii. When the individual returns, Company will ensure that injured/ ill individuals are given appropriate duties and assistance while they recover from the injury or illness. This might include making reasonable adjustments to the workplace, although these should not cause the business unjustifiable hardships.
- iii. Reasonable insurance to all staff & workers of all locations.

4. Culture of respect & support for Human Rights:

LMEL acknowledges human rights of its stakeholders, and it forms the central part of our community relations:

5. Conditions of work & wages:

- i. Being trained to work and then working in safe, healthy, and environmentally responsible ways comes first and foremost. The Factory Act forms the basis for recording and notification of occupational accidents and diseases in the organization.

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- ii. Ensure that wages are in accordance with the Minimum Wage Act & law of the land.
- iii. Ensure that employees are fairly remunerated, and that wages are regularly reviewed in a fair process.
- iv. The Company will over time harmonize health and safety standards and aim to make them uniform across the geographies it operates in. Health & safety committee involving management and worker representatives shall be formed to identify improvement areas.

6. Privacy:

The Company will:

- i. Not ask workers about their health or pregnancy status except when the status is directly relevant to the performance of job duties and seeking to keep such information confidential.
- ii. Ensure adequate protection of personal information held by the company. We only provide an individual's personal or other information to government authorities to the extent required by law and upon request, or with the individual's permission.
- iii. Seek to minimize the use of monitoring, surveillance and security measures that may invade the privacy of individuals to the extent practicable and using such measures solely for the legitimate business purpose of protecting its assets and the safety of its workers or others.

7. Equal Opportunity, Non-Discrimination, Diversity, and Inclusion:

The Company encourages an inclusive work environment, wherein diversity is valued, and equal opportunities are available to all the employees and stakeholders. The Company follows applicable laws and regulations in the matter of deciding wages/salaries, hours of work and welfare measures.

a. Age:

No age-based discrimination will be practiced by the company, either directly or indirectly. The company will take care to ensure that no one is given a worse treatment because of their real or perceived age.

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b. Gender:

The business will not discriminate on the basis of gender in regards to any part of employment (hiring, compensation, job assignments, promotions, layoffs, training, fringe benefits, and any other terms or conditions of employment), and it will set employment goals to maintain gender balance.

c. Marital Status:

The business won't make any distinctions based on marital status (i.e., single, married, in a de facto relationship, separated, divorced or widowed) The business will treat employees equally and refrain from making assumptions about their marital status or family circumstances. According to local legislation, both men and women have the right to marry without any restrictions.

d. Differently abled:

All people with disabilities will be treated with respect and decency. The company will provide the facilities that disabled individuals, including the blind, partially blind, and handicapped etc., should have access to (whether physically or mentally) The company won't take any actions that subject people with disabilities to unjustified hardships.

e. Race:

Racial insults, rude or disparaging comments regarding a person's ethnicity or color, or the use of racially objectionable symbols are all prohibited by the company. It is important to ensure that policies are developed and implemented with consideration for customs and cultural characteristics.

f. National/ Regional origin and ancestry:

The business will not engage in any employment-related discrimination based on origin or heritage (hiring, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment). As long as it doesn't negatively affect workplace

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health, safety, or security or interfere with employees' ability to do their job duties, the company will permit employees to use their native tongue in the workplace.

g. Indigenous/regional status:

The business will respect indigenous people's language, culture, and values. Company will work to get the free and informed agreement of indigenous people to move forward with developments. Company may engage in positive discrimination against indigenous people for vocational training, employment, and education. It could be necessary to make special provisions to respect and safeguard the widely practiced traditional systems and beliefs.

h. Religion & Spiritual practice:

To uphold this right, the company will make sure to: Reasonably accommodate an employee's religious practices or beliefs, unless doing so would put an undue strain on the business's operations. Flexible scheduling, voluntary shift substitutes or swaps, job transfers, and changes to workplace policies or procedures are a few examples of typical religious accommodations.

i. Political affiliation:

No political party or candidate for public office may be supported by the company. Although the company respects a person's political views, any such activity should take place outside of the company's facilities, and company resources should not be used (e.g. working hours, infrastructure, etc).

j. Sexual orientation:

The Company will not collect data on sexual orientation No discrimination will be made based on the sexual orientation of the person.

8. Avoiding connivance in Human Right abuses:

The Company will ensure its non-involvement in human right abuses related to:

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a. Child Labour:

- i. We need to make our contractors, suppliers, and others with whom we have a substantial involvement strongly aware of the standards which we expect from them.
- ii. We shall ask for an undertaking on noninvolvement in child labor from our suppliers/ contractors. When in doubt/as needed, the company will conduct surveys, site visits, and audits to keep an eye on their hiring methods. Instead of merely cancelling contracts with problematic suppliers, the company may choose a strategy of constructive engagement. However, the company must end the business relations if no improvement in the employment practices of contractors, suppliers, and others is seen.

b. Forced Labour:

- i. The Company will not make use of slave, forced or compulsory labor in any form.
- ii. The Company will ensure that employees are free to resign.
- iii. Ensure that all feasible measures are taken to prevent workers from falling into debt bondage through company loans.
- iv. The Company will refrain from retaining the personal papers of its employees (for e.g. - passport, Aadhar card, educational certificates etc.)
- v. We will request assurance from our vendors and contractors that they will not use child labor. The business will monitor its recruiting practices by conducting surveys, site visits, and audits when needed or when in doubt. The business may decide to pursue a strategy of constructive engagement rather than merely terminating contracts with problematic suppliers. If, however, there is no improvement in the employment practices of suppliers, contractors, and other parties, the commercial relationship must be terminated.
- vi. Company may opt for a strategy of constructive engagement with offending suppliers, rather than simply terminating contracts with them. However, if there is no positive impact observed in the employment practices of contractors/ suppliers and others; Company must terminate the business dealings.

Human Rights Compliance Officer.

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