

Human Rights Policy

Policy No : CHR/ 15 Supersedes : NA Pages : 3

Date of Issue : 26.05.2022 Effective Date : 01.06.2022

| Policy | Human Rights Policy |
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| Introduction | JK Cement Ltd recognizes the valuable role that business can play in the longer-term protection of human rights. The company is committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognized frameworks. Our commitment entails respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing and minimizing potential adverse impacts through due diligence and management of issues, and resolving grievances from affected stakeholders effectively. This document specifies the "Human Rights Policy" of J K Cement Ltd, its Subsidiaries/ other companies. |
| Scope | This policy applies to: Both executive and non-executive Directors of the company All employees of the company on permanent and contract role. Suppliers, subsidiaries, distributors, business contacts, agents, advisors, business associates, including current and potential clients, customers and others acting on the Company's behalf. While dealing with government, public bodies and non-profit organizations including their advisors, representatives, officials, politicians and political parties |
| | Our policies and training program for Code of Conduct (COC) and Prevention of Sexual Harassment (POSH) are intended to give associates the understanding and awareness required to carry out their responsibilities in compliance with legislations and regulations. COC and POSH documents are mandatory to go through. All associates are required to clear these assessments within 30 days of commencement of their employment and whenever considered necessary. |
| Community and Stakeholder Engagement | We recognize that we are part of the communities in which we operate. We engage with communities on human rights matters that are important to them such as access to 'good health'. We also engage with people in those communities, including indigenous people as well as other vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. |
| | Wherever appropriate, we engage with civil society and stakeholders on human rights issues related toour business. This includes issues in our Company, across our value chain and with our various sponsorships, through which we seek to promote respect for human rights. |
| Creating an Environment Free From | Our policies on Code of Conduct, Whistle blowing and Prevention of Sexual Harassment are applicable to everyone who work with or engage in operations of the Company. |
| Bullying And Harassment | Harassment is any form of behavior is unwelcome and unsolicited. For harassment to occur there does not have to be an intention to offend or harass. It is the impact of the behavior on the person who is receiving it, together with the nature of behavior, which determines whether it is harassment or not. |
| | Some common examples of harassment are: - Telling insulting jokes about particular groups or genders. - Displaying offensive posters or screen savers. - Making derogatory comments about someone's race or religion. - Offensive physical contact, derogatory language or intimidating actions. - Using any kind of abusive language in the workplace. - Insulting or threatening gestures or language (overt or implied) or continual and unwarrantedshouting in the workplace. - Unjustified and unnecessary comments about an associate's work or capacity for work. |

- Openly displayed pictures, posters, graffiti or written materials, which might be offensive to some.
- Phone calls or messages on electronic mail/snail mail or computer networks, which are threatening, abusive or offensive to associates.
- The exclusion of an associate or group from normal conversations, work assignments, work related social activates and networks in the workplace.

Sexual Harassment

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. Our Policy on Prevention of Sexual Harassment therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment. The policy outlines the preventive measure taken and framework for dealing with complaints, if raised.

The Company mandates all associates who join the company to undergo an e-learning training followed by an assessment.

Abuse of Managerial Authority

Abuse of Managerial authority means conduct by a reporting manager in relation to an associate whoreports to them or over whom they have supervisory authority and which:

- Intimidates, humiliates or undermines another associate by belittling them, or
- Excessively, destructively or inappropriately criticizing or reprimanding them, or excessively scrutinizing their work, or
- Makes demands that are unreasonable and/or outside that other associate's role; or
- Makes demand to perform an action that is in breach of the principles of any policy of JK Cement
- Use of any derogatory words either verbally or in writing

Diversity And Inclusion- D&I

The Company promotes and supports a diverse workforce across all levels. We believe that Diversity and Inclusivity (D&I) at workplace is an instrument for growth and we value and celebrate the uniqueness of every individual by fostering an environment of inclusion and empowerment. Towards this, we also ensure that all our policies and practices are compliant and aligned to all applicable laws and regulations specific to Diversity and Inclusion.

The Company is dedicated to creating a fair and transparent work environment with mutual respect forall. We strive 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. The basisfor recruitment, promotions, development, training, and compensation at the Company is qualifications, performance, skills and experience.

Enabling A Flexible Work Culture

We believe that providing a flexible work culture helps us retain talent and keeps our employees motivated and engaged.

We focus on providing of flexible work arrangements which may include benefits like Paternity and Maternity leave, Time off for personal reasons, and Work from Home (WFH) due to the pandemic/exigencies. WFH ensures continuity of our services during adverse scenarios and helps safeguard the health, safety and welfare of our associates, which is of paramount importance to us.

The company also promotes flexible working hours, especially in metro cities where commuting to office and back may put stress on the employee to reach office on a fixed time due to uncertainties in traffic etc.

Promoting Employee Morale, Skill Upgradation and Career Development

All our employees undergo regular training and development programs that are relevant to their role in the organization. The need for training/ skilling/ coaching is assessed through various methods Our continuous training programs, delivered through online and off-line platforms spans across technology, domain-expertise, business, process, behaviour and leadership.

We provide training to all employees without differentiation on grounds of gender, age or physical abilities. We also have specialized programs for senior leadership.

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| Safe And Healthy | We implement rigorous plans to ensure safety and welfare of Associates and to protect the assets and information from and during a disruption. |
| Workplace | We believe in creating awareness on work place practices and communicating information, instructions and training programs to enable all associates to comply with the Health, Safety and Environment. |
| Workplace Security | We are 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. |
| Data Privacy | JK Cement is committed to protect the data privacy of employees (including ex-employees and retirees), customers and suppliers. Our current data protection and privacy framework includes multilayer password protected authentication systems, automatic tools and tracking mechanisms, audits andinformation sharing on a need-to-know basis. We do not disclose information to third parties without explicit consent of our stakeholders, unless required by law to do so. |
| Human Dignity And Freedom of Association | We are committed to treating those engaged with our Company with dignity and respect. One of our core values is 'People' through which we affirm that we will value individual dignity, uphold the right to express disagreement and respect the time and efforts of others. Through our actions, we will nurture fairness, trust and transparency. |
| | JK Cement and all its 100% subsidiary companies, also respects the right of employees to exercise their lawful right of free association, participation, Collective bargaining and provide access to appropriate grievance Redressal mechanisms. |
| Communication | JK Cement communicates all necessary and relevant information with regards to organizational finances, policies and long term growth with associates. They are also made aware of related laws, guidelines and applicable policies when they join the organization and given periodic reminders duringtheir time in employment. |
| Child Labour | JK Cement prohibits child laborers and forced or compulsory labor including bonded labor, slavery and human trafficking. We prohibit the hiring of individuals that are under 18 years of age. |
| Grievance Mechanism | JK Cement implements the above standards by incorporating it in related policies, processes and guidelines across all our business operations. We believe that an empowered workforce is the best way to receive feedback and identify improvement areas. |
| | JK Cement Whistle-blower Policy is a critical means through which stakeholders can raise actualor suspected violations. |
| Review | The policy is reviewed periodically OR as and when, there are any changes required. |
| Approved by | January Company of the Company of th |
| | Andleeb Jain Chief People Officer |