

HUMAN RIGHTS POLICY



Overview

Human rights are fundamental rights, freedoms, and standards of treatment to which all people are entitled. Respect for human rights is rooted in our values and applies wherever we do business. Glochem Human Rights and Employment Policy (the “policy”) is intended to succinctly express Glochem communication to respect human rights on a worldwide basis. It embodies common principles reflected in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises.

Scope

The scope of the policy applies to all employees, partners, suppliers, and contractors of Glochem.

Our Policy

- **Diversity and Non-Discrimination**

The makeup of our staff is large and diversified. We respect the diversity of our Board of Directors, workforce, and the versatility of our value chain. We do not tolerate discrimination and strictly forbid any discrimination against any employee based on ethnicity, nationality, region or social origin, social background, social class, lineage, religion, disability, gender, sexual orientation, family responsibilities, marital status, group membership, political affiliation, age, or other status protected by the local laws or laws of other countries.

- **Humane Treatment**

We are committed to treating our employees humanely and do not allow any form of violence or harassment in the workplace. This includes sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse of workers, or threat of any such treatment.

- **Non-Discrimination**

We are committed to providing equal opportunities for all individuals, regardless of their background or characteristics. Glochem will not tolerate any form of discrimination or harassment, including but not limited to discrimination based on race, color, gender, sexual

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orientation, religion, or disability. We aim to foster an environment where diversity is valued, and all employees are treated fairly and with respect.

- **Anti-Harassment**

Glochem is committed to providing a work environment that is free from all forms of harassment, including but not limited to sexual harassment, verbal abuse, bullying, and any form of discriminatory or offensive behavior. We expect all employees, contractors, and stakeholders to treat each other with dignity, respect, and courtesy at all times.

- **PREVENTION OF SEXUAL HARASSMENT:**

The Company is committed to protect the employees from sexual harassment and ensures the compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Company recognizes that protection of employees against sexual harassment and the right to work with dignity are universally recognized human rights by international conventions. The Company shall deal expeditiously and fairly as per its policy for prevention of Sexual Harassment.

- **FREEDOM OF EXPRESSION**

The Company encourages individuals and all other stakeholders to speak up if they believe that the Company policies, or any laws are being breached, or an individual or group is acting in a manner that would adversely impact the reputation of the organization and or its employees. For employees, the Whistleblower Policy lays out the mechanism for any individual to raise a concern about unethical/non-compliant activities.

- **Working hours, Wages and Social Benefits**

- All employment must be in full compliance with all applicable laws and apply international standards where laws are less stringent, including working hours, overtime hours, minimum wage, overtime pay, and legally mandated benefits. Employees shall be allowed at least one day off for every seven working days.
- Glochem is committed to providing a living wage to all categories of employees, ensuring a decent standard of living. This commitment will be sustained by conducting a living wage assessment once every three years.

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- **Child Labor, Forced Labor and Human Trafficking**

- Glochem strictly prohibits the use of child labor in any form within our operations and supply chain.
- We are committed to adhering to international conventions and local laws concerning the protection of children's rights and the prevention of child exploitation.
- We do not tolerate forced labor, human trafficking, or any form of involuntary servitude. We ensure that employment is freely chosen, and all workers have the right to voluntarily leave employment with appropriate notice.
- We adhere to all relevant local, national, and international laws and conventions regarding child labor, including the International Labor Organization (ILO) conventions, the United Nations Convention on the Rights of the Child (CRC), and applicable national regulations.

In the event that child labour is detected, immediate corrective actions will be taken. This may include removing the child from the workplace, ensuring their access to education and support services, and addressing the root cause of the violation. We will work with local authorities and social services to ensure the child's welfare is prioritized.

- **Ethics**

We request that all Glochem members should uphold the highest standards of business ethics, including, but not limited to, maintaining business integrity, using no improper advantage, anti-corruption, avoiding conflicts of interest, protecting intellectual property rights, anti-trust, and assuring conflict minerals in products are from responsible sources.

- **Workplace health and safety**

We are dedicated to providing all workers with a clean, healthy and safe working environment. We maintain an occupational health and safety management system to achieve greater protection, where appropriate. It is our policy to comply with applicable regulatory requirements, reduce health and safety risks, and strive to achieve zero injury and incidents.

- **Freedom of Association**

We recognize that all employees in many of our operation locations have lawful rights to associate with others, form, and join, or refrain from joining organizations of their choice, and

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bargain collectively. We support freedom of expression and are committed to creating an environment where employees can share their concerns or suggestions freely without interference, discrimination, retaliation, or harassment.

- **Career Management & Training**

We are committed to providing opportunities for career development and training. Employees are encouraged to participate in skill-building programs that support personal growth, career advancement, and enhance their performance. Glochem invests in continuous learning and development, ensuring that all employees have access to the necessary tools and resources for success.

- **Value Chain Responsibility**

We expect all suppliers to uphold these same values and comply with our supplier code of conduct. All suppliers shall follow up on the above request and implement practices under an effective mechanism. Suppliers shall pursue actions to identify, monitor, and mitigate any adverse impact along the value chain.

- **Compliance Related to Policies**

The Glochem Human Right Policy is governed by a procedure that demands full compliance. Compliance with this policy will be reported to the Board of Directors annually. Daily practices and regular monitoring are implemented by each site through various modes. Grievance and remedy processes will take place on a continuous basis. Concerns from employees, partners, suppliers, and contractors can be communicated through various channels anonymously. Appropriate documents and records should be maintained to ensure compliance. To ensure the effectiveness of the policy, principles are reviewed annually and updated as needed. Training will be provided accordingly to employees and relevant stakeholders.

- **Grievance and Remedy Procedure**

We have put in place a formal grievance channel to enable anyone, including employees, Glochem suppliers, and other external stakeholders, to report human rights concerns. We will promptly investigate allegations and pursue action to mitigate any adverse human rights impact. Glochem does not tolerate retaliation against anyone who in good faith reports

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possible violations of laws, the Glochem Code of Conduct, or other company policies or procedures.

- **Targets:**

- Achieve zero lost-time injuries and occupational illnesses and Total Recordable Incident Rate (TRIR)
- 25% of female employee working in organization by 2033
- Achieve average 35 hours of training per employee annually by 2033
- A fair compensation structure is maintained, aligned with living wage benchmarks, ensuring that 100% of employees are covered under the living wage criteria.
- Continue supporting to employees to form a freedom of association
- 100% compliance to child labour and forced labour policy
- Zero incidents of human rights violation annually
- Ensure 100% of employee trained on refresher module on human rights policy annually.

- **Accountability:**

The responsibility for upholding this policy lies with all levels of management and employees within Glochem. Violations of this policy will not be tolerated and will result in disciplinary actions, which may include termination of employment and legal actions, if applicable.

- **Review**

The Company reserves the right to amend the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at the sole discretion of the management, and all the decisions of the management shall become final. Updated policy will be made available to all stakeholders after revision.