



SUSTAINABILITY POLICIES

Title of the Policy	:	HUMAN RIGHTS POLICY
Policy No.	:	20ML/HO/SAS/POLICY/002
Version no.	:	01
Version date	:	01.10.2024
Revision no.	:	00
Revision date	:	01.10.2024

Policy - Responsibilities:																	
R= Responsible (Process Owner) A= Accountable for Implementation	Process Owners																
	Lead Auditor – SAS	Management	Operation Head	Site Heads	Manager - SAS	Marketing Heads	SCM Heads	Production Heads	Corporate QAQC Heads	Site QAQC Heads	Engineering Heads	Corporate IT Heads	Corporate ER Head	Corporate HR Head	Site HR Heads	Warehouse Head	Mining Head
Authorizations	A	A	A	A	A	A	A	A	A	A	A	A	R	R	A	A	A

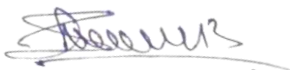
This Policy is applicable to 20 Microns Limited:			
HO	OF	PL	WH
Head Offices	Offices	Manufacturing Plants	Warehouses

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Place: WAGHODIA, VADODARA
Date: 01/10/2024


Narendra Shukla
DGM - ER

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1. Objective:

The objective of this Human Rights Policy is to formalize 20 Microns Limited's commitment to respecting and promoting human rights across all areas of business operations. This policy aligns with international frameworks, including the United Nations Guiding Principles (UNGPs) on Business, the OECD Guidelines for Multinational Enterprises, Human Rights, and is designed to meet both global standards and Indian labour law requirements. Our aim is to prevent, address, and remedy any potential adverse impacts on human rights arising from our operations, supply chain, and interactions with communities and stakeholders.

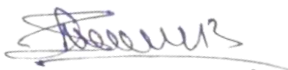
2. Scope:

This policy applies to:

- ⇒ Management, all employees, customers, suppliers, contractors, workers and other stakeholders working directly and indirectly in and for 20 Microns Limited.
- ⇒ Governing and Operating entities of 20 Microns Limited:

Sr. No.	Site Name	Site Address	Site Type
1.	Waghodia	Plot no: 347, GIDC, Waghodia, Dist.; Vadodara, Gujarat, India Plot No: 9-10, GIDC, Waghodia - 391 760, Dist: Baroda, Gujarat, India	Head Office and Registered Office
2.	Mumbai	Hindustan Kohinoor Industrial Complex, Mumbai, Mumbai 400083	Office
3.	Vadodara	307-308, Arun Deep Complex, Race Course, Vadodara, Gujarat	Office
4.	Alwar	B-77 & B-78, M.I.A.; Matsya Industrial Area, Alwar - 301 030, Rajasthan, India.	Manufacturing Plants
5.	Bhuj	Survey No: 149/P-1, 149/P-3, 156, 157, 158/P-1, 158/P-2, Village: Mamuara, Tal: Bhuj, Dist: Kachchh - 370 020, Gujarat, India	Manufacturing Plants
6.	Tirunelveli	104/3, Tenkasi Road, Village & Post - Puthur, Via - Alangulam, Dist: Tirunelveli - 627851, Tamilnadu, India.	Manufacturing Plants
7.	Hosur	Plot No. 23/24, SIPCOT Industrial Area, Phase II, Near TVS School, Hosur - 635 109, Tamil Nadu, India	Manufacturing Plants
8.	Udaipur	F-232-233 & 234, Road No. 1E, MIA, Madri,	Manufacturing Plants

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		Udaipur - 313 003, Rajasthan, India	
9.	Haldwani	Nr. Gola Ganpati Motors, Goraparav, Bareilly Road, Haldwani - 263139, Nainital, Uttarakhand, India	Manufacturing Plants
10.	Nagor	Plot No-I I, Nagor GIDC Estate, Village- Nagor, Bhuj-Kutch - 37000I.	Manufacturing Plants
11.	Parbatsar	H-116-117, IGC RIICO Industrial Area, Parbarsar, Tehsil - Parbarsar, District - Didwana-Kuchaman, Nagour, Rajasthan	Manufacturing Plants
12.	Uran Raigad	Plot no: 172/2, Chinchavan Village, Panvel - 410206, Tal: Raigad, Mumbai, Maharashtra, India	Warehouses
13.	Thiruvallur	Plot no: 127/2A, Thiruvallur High Road, Alamathi Village, Chennai - 600052, Tamilnadu, India	Warehouses
14.	Alampur	Alampur NH - 6, New Kolorah Andul, Near Gurudwara School Compound, B S Tar Pvt. Ltd., Howrah - 711302, West Bengal, India	Warehouses
15.	Mundra	Plot No: 01/02, At: Dhrub Revenue, Survey No: 81/1, Village Dhrub, Near Adani Port, Mundra - 370421, Gujarat, India.	Warehouses
16.	Anantpur	43/1, Near Tractor nagar, Garladinne, Anantpur - 515731, Andhra Pradesh, India	Warehouses
17.	Koliwad Sanjan	Plant No; B1, CTS No: NA239/P1, Supertech Industrial Park, Koliwad, Village: Sanjan, Taluka: Umbergaon, District: Valsad, Gujarat – 396150, India.	Warehouses

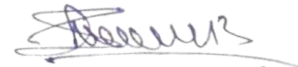
The policy encompasses all company activities and serves as a standard for evaluating human rights compliance throughout our supply chain and partnerships.

3. Governance and Allocation of responsibilities:

The Head ER is responsible for implementing and periodically reviewing this policy to ensure alignment with evolving human rights standards, regulatory requirements, and company commitments.

Managers and supervisors play a crucial role in promoting awareness of this policy, overseeing compliance, and supporting a workplace culture that respects human rights.

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All employees, contractors, and associates are expected to understand this policy, adhere to its principles, and report any potential violations or non-compliance they observe.

4. Policy:

Ethical Business Conduct and Anti-Corruption: 20 Microns maintains a zero-tolerance policy towards corruption and unethical practices, recognizing that these can negatively impact human rights and community well-being. Our commitment includes adhering to anti-corruption laws, practicing transparent reporting, and ensuring that all business dealings align with our ethical standards and human rights commitments.

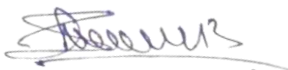
Diversity, Equity and Inclusion (DEI): As part of our human rights commitment, we promote diversity, equity and inclusion across our organization. We aim to create an inclusive workplace by setting measurable goals related to hiring, promotion, and employee development for underrepresented groups. This aligns with our policy on non-discrimination based on race, gender, religion, disability, sexual orientation, age, or any other personal characteristic and contributes to a more equitable working environment. We strive to create a diverse, inclusive, and respectful workplace for all employees, free from discrimination and harassment.

Grievance Mechanism and Access to Remedy: Employees, suppliers, community members, and other stakeholders have access to an established grievance mechanism that enables them to raise human rights concerns confidentially. This mechanism ensures issues are addressed timely and effectively, providing access to remedy for any harm that may arise. Clear procedures for escalating and resolving grievances are outlined and made accessible to all stakeholders.

No Child Labour: We strictly prohibit the use of child labour in all our operations and expect our partners and suppliers to comply with this prohibition. The company adheres to Indian labour laws and international guidelines on the minimum age of employment, actively working to prevent child labour across our supply chain.

No Forced Labour, Compulsory Labour, or Human Trafficking: We strictly prohibit any form of forced labour, bonded labour, or human trafficking in all aspects of our operations. Employment is entered into freely, and no individual is compelled to work under threat, coercion, or without compensation.

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Free, Prior, and Informed Consent (FPIC) and Land Rights: In projects that may impact local communities, we prioritize obtaining the free, prior, and informed consent of affected groups, especially when it comes to land use and development activities. This includes respecting the land rights of Indigenous peoples and other vulnerable communities.

Rights of Communities Where We Operate: We recognize the impact our operations may have on surrounding communities and are committed to conducting business in a manner that supports the social, economic, and environmental well-being of these communities. This includes engaging in open dialogue and supporting Corporate Social Responsibility (CSR) initiatives.

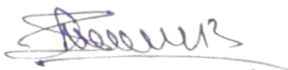
Freedom of Association and Collective Bargaining: We respect our employees' right to freedom of association and collective bargaining, allowing employees to join unions and engage in open communication regarding work conditions without fear of retaliation. We support compliance with both local and international labour laws in this regard.

Environmental Health & Safety (EHS) Alignment: To protect the health and safety of employees and the communities around us, 20 Microns Limited is committed to adopting sustainable practices that minimize environmental impacts. This includes monitoring waste management, emissions, water usage, and implementing best practices for energy efficiency and resource conservation. We encourage transparency and accountability regarding our environmental impact as part of our broader responsibility to human rights.

Right to Decent Work and Occupational Health and Safety: We are committed to providing fair, safe, and healthy working conditions across all operations. This includes compliance with legal requirements on wages, working hours, and workplace health and safety standards. Employees are trained to prioritize both their own safety and the safety of others, reducing risks associated with industrial processes.

Monitoring, Reporting, and Transparency: The company commits to regular monitoring and reporting on human rights impacts, engaging independent audits, and publishing findings in our annual ESG or sustainability report. This includes documenting progress toward human rights KPIs, reporting challenges faced, and setting targets for future improvements to ensure transparency and accountability.

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Data Privacy and Security: In protecting human rights, safeguarding personal data of employees, customers, and stakeholders is crucial. We adhere to data privacy regulations and maintain stringent measures to prevent unauthorized access, misuse, or exploitation of personal information. Our policies ensure respect for individual privacy, aligned with international and national data protection standards.

Consumer Health & Safety: 20 Microns is committed to ensuring the safety and quality of our products and services. This includes compliance with applicable laws and standards related to consumer safety, taking all necessary steps to prevent potential hazards to consumers.

Due Diligence and Stakeholder Engagement: We conduct regular human rights due diligence to identify, prevent, and mitigate potential human rights risks. This process includes ongoing stakeholder engagement with employees, suppliers, local communities, and other parties to address and resolve human rights issues.

Remediation for Policy Violations: Any violation of this policy or human rights-related concern can be reported confidentially to the Human Resources or Customer Care departments. We take prompt action to investigate, and remedy confirmed violations and are committed to ensuring that appropriate corrective measures are implemented.

Governance Commitment: Our Board and senior management demonstrate a commitment to human rights by endorsing this policy, conducting regular reviews, and updating the policy as necessary to meet evolving standards and expectations.

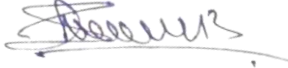
5. Disciplinary Measures for Human Rights Policy Violations

20 Microns Limited is committed to maintaining the highest ethical standards, including integrity, transparency, accountability, and responsible business practices in environmental, social, and governance matters. The company has established clear disciplinary measures for violations of this Policy. These measures ensure accountability and safeguard the integrity of the company's operations.

Issuance of Formal Warnings: For minor violations, employees may receive documented warnings outlining the nature of the violation and corrective actions required.

Mandatory Training or Counselling: Employees found in violation may be required to attend additional training sessions or counselling programs focused on ethical conduct and compliance.

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Suspension Without Pay: In cases of significant violations, employees may face temporary suspension while investigations are conducted.

Termination of Employment: Severe breaches, such as bribery, misrepresentation of information, or consistent non-compliance with Human Rights guidelines, may result in immediate termination of employment.

Legal Action: If the violation involves illegal activities such as bribery, environmental regulation violations, or financial misconduct, the company reserves the right to initiate legal proceedings.

Supplier or Partner Penalties: In cases where violations involve suppliers or business partners, penalties may include suspension or termination of contracts and partnerships.

Public Disclosure of Actions: For severe or repeated violations impacting public trust, 20 Microns Limited may disclose disciplinary actions in its external reporting mechanisms.

6. Key Performance Indicators:

The following Process Performance is to be monitored and measured.

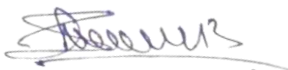
Sr. No.	Key Performance Indicators	Unit of Measurement	Baseline	Target	Timeline	Monitoring Frequency
01	Zero Human Rights Violations/ Incident	Nos.	FY: 2021-22	Zero	March-26	12 Months
02	To provide nos. of Training for Human Rights	Nos.	FY: 2021-22	1/ year	March-26	12 Months
03	To conduct Internal audit for the Human Rights	Nos.	FY: 2021-22	1/ year	March-26	12 Months

7. Training and Communications

We, 20 Microns Limited, should conduct regular training programs to increase awareness and understanding of human rights practices, legal requirements, and responsibilities across all levels of the organization.

The policy is accessible on the company's internal portal and website, ensuring that all employees and partners can easily reference it.

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We, 20 Microns Limited, encouraged suppliers and business partners to adopt similar human rights standards, with regular communication to ensure alignment with our expectations.

8. Review and Update

The Human Rights Policy will be reviewed at least once every two years to ensure its continued relevance and effectiveness. The review will be conducted by the Head ER, Management, Plant HODs, Functional HOD's, and Relevant Team Members in the Management Review Meeting.

In the event of significant changes in our operations or business activities, the Human Rights Policy may be updated outside the scheduled review cycle to ensure alignment with our evolving human rights objectives and compliance requirements.

9. Acknowledgment and Acceptance

Acknowledgement and signing this Human Rights Policy Manual:

I, the undersigned, acknowledge that I have received, reviewed, and understood the Human Rights Policy of 20 Microns Limited. I recognize that this manual serves as a guiding framework for the Company's commitment to sustainable and responsible business practices.

By signing this acknowledgment, I confirm and commit to:

- Adhering to the Company's Human Rights principles, including environmental sustainability, social responsibility, and ethical governance.
- Reporting any actual or potential violations of Human Rights policy.
- Supporting the Company's Human Rights initiatives and best practices.

By signing below, I affirm my commitment to upholding the Human Rights policy of 20 Microns Limited and contributing to the Company's vision of responsible and sustainable business practices.

Employee Name : _____

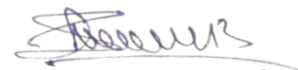
Place: _____

Designation : _____

Date: _____

Signature : _____

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