

Human Rights Policy

Document Number: Jindal Steel/Human Rights/2025/01

Version: 1.0, Date: 28.07.2025

All information contained in this document is proprietary and intended solely for use
by

Jindal Steel Limited's Employees.

Any unauthorized duplication or distribution is strictly prohibited.



Document Control

Document Publication History	
Document Prepared by	Nidhi Agrawal Maitreyee Mishra Sahil Goyal Pratik Ghosh
Document Reviewed by	Ashok Mahunta Anirban Basu Dilip Kumar Sinha Prashant Kumar Hota Rajesh Nair Naveen Ahlawat
Document Approved by	Gautam Malhotra
Document Owned by	Corporate Sustainability
Effective Date	28.07.2025
Review Frequency	Annual
Document Classification	Public

Document Distribution List			
#	Name	Organization	Purpose
		Jindal Steel Limited	

Document Approval History				
Version	Date	Name	Role	Comments
1.0	24-11-2025	Gautam Malhotra	CEO	
2.0				



Application of the Human Rights Policy at Jindal Steel:

This policy sets the responsibility and commitments of our company towards protecting the human rights of its employees, workers and other key stakeholders involved in its corporate operations and business activities. This policy applies to all Jindal Steel's group companies and is mandatory for all employees, contract staff, suppliers, contractors, and on-site partners across all locations.

Jindal Steel's Principles for Protecting Human Rights:

Jindal Steel is committed to respecting all internationally recognized human rights, including those set out in the UN Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) Core Conventions, and the OECD Guidelines for Multinational Enterprises. These standards inform our approach to responsible business conduct, labor rights, and due diligence across our operations and supply chains.

1. Jindal Steel's Human Rights Principles towards Employees

- a. **Equal Opportunity:** Jindal Steel provides equal opportunity to each and every individual of same skill set. We don't accept any discrimination on the basis of race, colour, gender, age, religion, ethnicity, nationality, disability, social origin except by way of compliance with the preferential order established if any by law or policy mandated by the Central or State Governments is applicable in the geographical area of its operations. Equal Opportunity is also an essential part of Jindal Steel's Core Values outlined by the Human Resources department.
- b. **Abolition of Child Labour:** Our company strictly rejects the employment of children aged below 18 years of age in company role or by any contractor.
- c. **Rejection of Forced or Compulsory Labour & Human Trafficking:** Jindal Steel rejects the use of any forced or compulsory labour. The company does not accept any material gains to commence an employment relationship or to retain a worker against their will. Furthermore, the company is committed to preventing all forms of human trafficking and forced labor within its operations and supply chain
- d. **Eliminating Harassment:** Jindal Steel rejects any form of harassment; physical, verbal, sexual or psychological abuse; threats; or intimidation in the workplace.
- e. **Health, Safety and Security:** Jindal Steel provides healthy, safe and secure environment to each and every individual working at its workplace.

- f. **Fair Remuneration:** Jindal Steel practices fair & equal remuneration to all for equal work and value. Jindal Steel pays remuneration at par or above the minimum wage decided for the region by appropriate Government
- g. **Work Life Balance:** We understand the requirement of work life balance for its employees, hence Jindal Steel offers and supports employees to spend quality time with family by availing the LTA policy
- h. **Union of Employees:** The Company respects and upholds employees' right to freedom of association and supports their fundamental right to engage in collective bargaining, in line with international human rights standards.
- i. **Skills Development:** Jindal Steel recognizes the need of skill development of its employee and is committed to arrange training programs regularly for updating skills of employees.

2. **Jindal Steel's Human Rights Principles towards Local Communities and Society**

- a. **Culture, Customs and Values:** Jindal Steel will respect culture, customs and values of the people in the communities and will contribute within our scope and capabilities
- b. **Minimizing the Relocation Impact:** Jindal Steel understands the consequences faced by communities due to relocation, so it endeavours to minimize the adverse impact of relocation by engaging with them in their social and economic development towards bettering the socio-economic standards in the community
- c. **Safety:** Jindal Steel is duty bound to protect life, liberty and property of the employees, customers, suppliers, while on its premises and ensures the provision of security in our operations is in accordance with laws, as applicable and necessary. Company uses force only to defend and protect its stakeholders and property when necessary and proportionate to the threat.
- d. **Integrity:** Jindal Steel endeavours to uphold the highest standards in business ethics and integrity for all business relationships. Integrity is also part of our core values established by the Human Resources department.
- e. **Indigenous Peoples:** Jindal Steel respects the rights and culture of indigenous peoples and communities, f) **Communications:** We ensure that all its commercial communications are non-discriminatory and does not affect any section of society adversely.

3. **Implementation and Monitoring of Jindal Steel's Human Rights Policy**

- a. Jindal Steel allocates appropriate budget to the functions related to health, safety, security, ethics and education for skill development.

- b. Jindal Steel has established a Grievance Cell for all complaints related to violation of Human Rights,
- c. Jindal Steel organizes Behavioural Training sessions for employees and where required, we organize; Special training sessions for employees of departments related to Human Rights such as HR, CSR, Liaison, Contracts, Administration, Safety and Marketing.
- d. All harassment related violations are considered by Jindal Steel as a breach of Group Code of Conduct and necessary action is taken accordingly. We have a Committee for Prevention of Sexual Harassment.
- e. To monitor over time working habits, Jindal Steel seeks explanation from the person concerned and her/his reporting manager.
- f. Whenever any stakeholder i.e. either employee or external stakeholder identifies any violation to this policy, she/ he can report the same to Chief of Ethics Committee by email or post. The person reporting the violation is protected by a 'Whistleblower Policy' of the company where the Whistleblower is protected.
- g. For monitoring the implementation of Jindal Steel's Human Rights Policy, the performance related to the commitments made in this policy will be reported in Jindal Steel's global monthly Business Unit meetings as well as in the Business Responsibility Report. We have our speak-up channel which is accessible for all our employees.
- h. All purchase orders and vendor contracts will include mandatory HR compliance clauses, including ethical employment and workforce standards. The company reserves full audit rights to verify adherence, and any breach may trigger corrective actions up to and including contract termination.
- i. We will apply continuous human rights due diligence across our operations, communities, suppliers, and investments to detect emerging or actual impacts. This includes annual HR risk assessments, pre-contract supplier screening, and regular re-evaluation, with any high-risk issues promptly escalated and addressed.

4. Communication and Training on Protecting Human Rights at Jindal Steel:

Jindal Steel conducts mandatory annual human rights training for all employees to ensure a clear understanding of the company's commitments, expectations, and standards. These sessions reinforce awareness of potential risks and promote responsible behavior across all operations.

5. Oversight & Governance of Human Rights Policy:

The Human Rights Policy is governed through board-level oversight, led by the CSR/Sustainability Committee, ensuring accountability at the highest level. Operational

ownership rests with HR in coordination with the Sustainability team, who oversee implementation and monitoring. Clear escalation protocols are in place to address grievances, policy breaches, or emerging human rights risks in a timely and transparent manner.

6. Grievance Redressal & Monitoring Human Rights cases:

An independent third-party grievance channel will be available to all employees and vendors, ensuring anonymity and strict non-retaliation. All cases will follow defined response timelines, with a clear remediation and tracking process until closure. Additionally, we will monitor key indicators including grievance volumes, closure timelines, training completion rates, and supplier screening coverage. Performance against these KPIs will be reviewed regularly, with an annual public report to ensure transparency and accountability.

A handwritten signature in blue ink, appearing to read "Gautam Malhotra".

Gautam Malhotra
Chief Executive Officer

