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HUMAN RIGHTS POLICY

IGC Group (IGC) acknowledges that there are several human rights issues that must be considered and accommodated with respect to its employees. Particular attention is given to groups of persons who may be more vulnerable to human rights violations, namely, women, ethnic, national or religious minorities, LGBTQ+ and people with disability. IGC understands its responsibility to respect the rights of prospective employees when interviewing and considering candidates for roles within the company. IGC makes sure the hiring process is fair and consistent across the board for all employees, and non-discriminatory hiring decisions are taken. The principles of equal opportunity and non-discrimination are the same whether dealing with existing or potential employees.

Whenever possible, IGC hires new employees that have been referred by trusted sources. In case hiring is done through external channels, the necessary checks are done to guarantee Human Rights are fully respected by those external channels. Once hired, every employee is treated with fairness, equality, respect and dignity. All employees are notified of human rights issues that are of importance to them, including, but not limited, harassment, discrimination and physical, sexual, racial, religious, psychological, verbal or any other form of harassment. Before engaging in a business relationship with a customer or supplier, our Compliance Officers in each of our entities will conduct a due diligence process to verify if the business partner is not violating any Human Rights. By this it means ensuring that no ties to torture, cruelty, degrading treatment, coercive child labour, sexual violence, war crimes, crimes against humanity and genocide are made with IGC Group.

After approval of the Group Compliance Officer (GCO) or a member of the Board of Directors (BoD), the entity can enter into the requested business relationship.
If anyone within IGC suspects or becomes aware of malpractices within our Group or its global supply chain, he/she will notify the GCO immediately. The GCO will then start an investigation and if necessary, will report the practices to the authorities.

In case of a confirmed breach of any of the Human Rights, IGC will attempt to mitigate and remediate the damages caused by the breach. ICG remains committed to respect internationally recognized human rights expressed in the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and the UN Guiding Principles on Business and Human Rights.

Purpose

The overarching aim of this policy is respect human rights across all of IGC activities, which means to avoid infringing on the human rights of others.

Scope

This policy applies to all IGC employees, contractors and supplier workers, customers, communities, and other persons encountered during IGC activities.

Approved by ADS - 06 January 2025

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BASIC HUMAN RIGHTS:

Non-Discrimination

The employees of IGC represent a talented and diverse workforce. Achieving the full potential of this diversity is a business priority that is fundamental to our competitive success. A key element in our human resources management is IGC's commitment to equal opportunity. Business activities such as hiring, promotion, and compensation of employees, are conducted without regard to, but not limited to:

- Race / colour;
- Genetic makeup;
- Age;
- Religion;
- Ethnicity / nationality;
- Disability / medical history;
- Marriage / civil partnership;
- Pregnancy / maternity/ paternity;
- Gender identity or expression / sexual orientation.

Gender Equality

Business activities such as hiring, promotion, compensation of employees and the design and administration of IGC's HR management comply with all applicable laws including those dealing with equal opportunity. IGC respects gender equality among its employees in the following cases, but not limited to:

- Equal pay for similar jobs;
- Protection against discrimination based on marital status;
- Protection against threats of dismissal or any employment decision that negatively affects their employment status in order to prevent them from getting married or becoming pregnant;
- Adherence to the law and the entity's policies on human rights, including human trafficking, harassment, discrimination and physical, sexual, racial, religious, psychological, verbal or any other form of harassment;
- Women employees are entitled to maternity protection, (leave and benefits as well as protection against discrimination) in accordance with the requirements of national laws and regulations or ILO conventions (Nos. 183, 103 and 3);
- Protection against discrimination and disciplinary appeal procedures;
- Protected against all forms of discrimination of employees with family responsibilities, both men and women,
- Provision of equal opportunities for women and men for all aspects of training, personal and professional development and advancement;
- Documented reporting to the GCO and the BoD of the IGC entity.

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The GCO/BoD will decide upon the necessary corrective and/or preventive actions incase the above are not successfully adhered to The GCO and local compliance officers will organize the effective implementation of the decided actions.
Reasonable time frames, in line with the severity of the case, will have to be respected throughout the procedure.

Right of Freedom and Association

IGC respects the right of employees to associate freely in trade unions or employees' organizations of their choice, without interference of negative consequences to them.
Awareness of and responsibility for compliance with freedom of association and access to collective bargaining requirements is part of the senior management responsibilities in all IGC entities.
IGC does not promote any particular union or employees' association, nor does it coerce employees to join or leave one. If applicable, election of union representatives occurs without obstruction or intervention from the company.

Right of Collective Bargaining

IGC respects the right of employees to collective bargaining and adheres to collective bargaining agreements, where such agreements exist. As applicable law varies significantly across different jurisdictions, IGC makes sure its local entity understands its legal obligations.
Where an employee organization exists, the IGC entity's representative enters into negotiation for the purposes of reaching a collective bargaining agreement. Once a collective bargaining agreement is reached – whether at a company, sector or national level – it is implemented and respected within the business entity.

Health and Safety

IGC is determined to provide its employees with safe and healthy working conditions in accordance with applicable law or other relevant industry standards.
IGC will provide and maintain workplaces with:

- Safe and freely accessible drinking water;
- Clean facilities for eating and storing food;
- Hygienic washing and toilet facilities in line with the number and gender of staff employed;
- Fire safety equipment and alarms;
- Clearly marked, unlocked and unblocked emergency exits and escape routes;
- Access to adequate power supply and emergency lighting;
- Childcare and breastfeeding facilities in accordance with or beyond applicable law;
- Suitable conditions for pregnant or nursing women, or alternative working arrangements to avoid unsuitable workplaces;
- Adequate on-site first-aid provisions and trained first-aid personnel;
- Safe working equipment;

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- Ergonomic workstations;
- Emergency procedures and evacuation plans for all reasonably foreseeable health and safety emergencies. These shall be accessible or clearly displayed, regularly tested, and periodically updated; and
- Adequate on-site guidelines and equipment for the prevention of contagious diseases.

All employees are asked to look out for signs related to potential drug abuse, such as, but not limited to unexplained need for money, frequent absences from work, being chronically late to work, ignoring activities that used to be important to them, tiredness and other unexplained sporadic behavior

Forced Labor and Child Labor

IGC will, under no circumstances, contribute to, facilitate, or endorse forced labor, including bonded, indentured, involuntary prison labor, child labor, child slavery, trafficking of children, forced child labour or use of children in armed conflict. Similarly risks of human trafficking within IGC group, from suppliers, contractors and through recruitment agencies, are assessed and addressed during the selection and recruitment process.

IGC will not unduly restrict employees movement in the workplace, retain original copies of employee's personal documentation, such as identity papers, use deceptive recruitment practices and/or require employees to pay a deposit, equipment advances or recruitment fees as part of the recruitment process. IGC will not withhold any part of the worker's salary, benefits, or property in order to force the worker to continue working or prevent employees from terminating their employment after reasonable notice, in accordance with applicable law.
All employees at IGC enter into an employment contract with IGC voluntary and without pressure.
IGC will not hire any employees under the age as prescribed under ILO Convention 138 (younger than 15):

- All managers and employees are informed of the company policy on not hiring any employee below 18 years of age.
- All advertisement placed for hiring of employees in and outside factory must specify the minimum age of job applicants at 18 years.
- Job applicants are required to present an official document certifying that they reached complete 18 years of age when they submit their job applications.
- The relevant manager is required to verify the age of job applicants.

The entity authorized manager or director, upon signing the employment contract, shall make sure that no person under 18 years old is hired.

Working Conditions

IGC shall ensure that the employment terms regarding working hours, wages, breaks and leave. are communicated to the employees in writing before employment starts, in a language they understand. Employees shall work maximum 48 hours per week or less in accordance with applicable law, not including overtime.

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Overtime shall be permitted when allowed by applicable law or collective bargaining agreements. Overtime shall be, at all times, requested under a voluntary system, and refusal to work overtime shall not be punished, retaliated against, or penalized in any way.
The sum of overtime and the normal working week shall not exceed 60 hours per week unless defined otherwise by applicable law or collective bargaining agreements or under exceptional circumstances such as production peaks, accidents, or emergencies.
IGC will provide its employees with at least one uninterrupted work break of reasonable duration when working longer than six hours or more breaks in accordance with applicable law.
IGC will provide employees with at least one rest day in seven consecutive working days, unless otherwise defined in collective bargaining agreements or applicable law or during peak production periods, as long as these are rare and the longer work time is voluntary and compensated.
IGC will provide its employees with all legally mandated public holidays and leave, including maternity and paternity, compassionate and paid annual leave of at least 3 weeks or more according to applicable law.
IGC shall provide all its employees a wage rate for normal hours worked, not including overtime, based on either applicable law or industry standards, whichever is the highest. If there are performance-related wages, they shall be no less than the legal minimum wage for a normal working week. IGC shall give comparable wages to all employees for carrying out work of equal value and shall not discriminate in accordance with the non-discrimination clause set herein.

Human rights due diligence process

IGC is dedicated to upholding the highest human rights standards through comprehensive due diligence processes. These processes identify, prevent, and mitigate potential adverse impacts across its operations and relationships. IGC equally considers civil, political, economic, social, and cultural rights, conducting risk assessments, stakeholder consultations, and engagements with civil society. IGC aims to avoid and remediate adverse impacts, even if indirectly linked to its business. Annually, IGC transparently communicates its efforts and progress in addressing human rights impacts to its stakeholders.

Non-Discrimination

IGC holds that no employee of IGC Group is discriminated on the basis of race, colour, ethnicity, caste, national origin, religion, age, disability, genetic information, physical appearance, gender, marital status, parental or pregnancy status, family or caring responsibilities, sexual orientation, HIV or other health status, membership of worker representative bodies or political affiliation or any criteria that are unlawful at any level of the organization including the corporate governance body or any other personal characteristics unrelated to the requirements of the work. Discrimination can mean distinction, exclusion, or preference. Throughout all our policies and procedures, we take into account non-discrimination, such as in matters of employment, including recruitment, wages, benefits, promotions, training, transfer, termination and retirement. Where local employment is encouraged or

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laws promote local linkages, positive acts of discrimination are encouraged, namely, by employing people from the local areas.

Harassment and Bullying

IGC Group prohibits all forms of violence and harassment in the workplace, including but not limited to bullying; harsh or degrading treatment; gender-based violence; sexual or physical harassment; mental, physical, verbal, or sexual abuse; retaliation; coercion; and intimidation. Both direct and indirect harassment in any form is not acceptable in any of IGC workplace facilities. IGC ensures its employees are treated with dignity and respect and are not subjected to harassment or violence, or threatened with these towards themselves, their family, or colleagues. Employees have channels available to them where they can safely and securely raise any concerns about harassment and violence.

Disciplinary Action

IGC will only discipline worker's actions/behavior in accordance with applicable law or in line with the BPP/RJC Code of Practices, whichever is more stringent. No corporal or degrading punishment will ever be justified by IGC and therefore shall, at all times, be prohibited.
If required, disciplinary actions are the following:

- Counselling or verbal warning
- Written reprimand and warning
- Suspension or Suspension pending investigation and final determination
- Specific warning of termination
- Termination.

The disciplinary action will always be in proportion to the offence committed by the employee.
IGC shall not make wage deductions unless they comply with applicable law and the employee will not make less than the minimum wage due to this deduction.
In case of a dispute over the disciplinary action between the disciplined employee and management or BoD, the GCO will attempt to mediate between them to find a solution within reasonable time. If the GCO fails to find a solution, the disciplinary actions will stay in effect.
The disciplined employee may always turn to the competent court in case of a termination.

In case of concerns or for more information please contact:

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