

SUZLON ENERGY LIMITED

HUMAN RIGHTS POLICY

1. Policy History

Date of Board approval	Particulars	Effective Date
22 nd July 2024	Implementation of Human Rights Policy	22 nd July 2024

2. Purpose of this Policy

- 2.1 Suzlon Energy Limited (“SEL” or the “Company”) is committed to protecting and promoting human rights in all aspects of its operations. The Company strives to ensure that it respects and upholds these rights at all times and promote human rights in accordance with the National/International policy frameworks. The SUZNITI policy document sets out the Company’s commitment to human rights and the actions that are taken to ensure that this commitment is met.
- 2.2 This policy is in alignment with applicable international and national standards and frameworks, such as United Nations Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, Human Rights Principles (Principle 1 and 2) of United Nations Global Compact, and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

3. Applicability of this Policy

- 3.1 This Policy applies to Suzlon Energy Limited, its subsidiaries, Board of Directors, joint ventures, and equivalent associations, employees, workers, customers, vendors, contractors, communities, and other stakeholders.

4. Definitions

Unless repugnant to the context:

- 4.1 “Act” shall mean the Companies Act, 2013 including the Rules made thereunder, as amended from time to time.
- 4.2 “Applicable Laws” shall mean the Act and Rules made thereunder, the Listing Regulations (as defined hereafter), the NGRBC Guidelines and / or such other Act, Rules or Regulations which are / may be applicable to the objective and/or subject matter of this Policy.
- 4.3 “Board” or “Board of Directors” shall mean the Board of Directors of the Company.
- 4.4 “Company” or “SEL” shall mean Suzlon Energy Limited.
- 4.5 “Guidelines” or NGRBC Guidelines shall mean the National Guidelines on Responsible Business Conduct issued by the Ministry of Corporate Affairs on 10th December 2018.

- 4.6 “Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force.
- 4.7 “Policy” or “this Policy” shall mean this Human Rights Policy.
- 4.8 Interpretation – In this Policy unless the contrary intention appears, words and expressions used and not defined in this Policy but defined in the Applicable Laws shall have the meanings respectively assigned to them in those Applicable Laws.

5. Review of the Policy and disclosure requirements

- 5.1 This Policy has been implemented w.e.f. 22nd July 2024.
- 5.2 This Policy shall be disclosed on the website of the Company.
- 5.3 The Board will review this Policy on a periodic basis to ensure its effectiveness and also compliance with the Act and the Listing Regulations.
- 5.4 This Policy is subordinate to the Listing Regulations or other applicable statutory provisions including the Companies Act, 2013, as amended, and in the event of disparity between this Policy and the Applicable Laws (including due to subsequent amendments to the Applicable Laws), the provisions of the Applicable Laws will prevail.
- 5.5 To the extent any change or amendment is required due to change in the Applicable Laws, the Managing Director or the Chief Executive Officer of the Company shall be authorised to review and amend the Policy to give effect to any such changes or amendments. Such amended Policy shall be placed before the Board for noting and necessary ratification in next board meeting held after such change.
- 5.6 The Board reserves any right to alter, modify, add, delete or amend any of the provisions of this Policy subject to Applicable Laws.

6. Policy Statement

- 6.1 The Suzlon policy document sets out commitment to human rights at Suzlon and the actions being taken to ensure to meet this commitment.
- 6.2 Suzlon believes that every individual is entitled to fundamental human rights, regardless of their race, gender, nationality, religion, sexual orientation, or any other status. The Company is committed to upholding the following human rights principles in operations
- 6.3 The Company is committed to protecting human rights in its supply chain, including in its policies against child labour, forced labour, and works towards worker safety. The Company monitors and audits its suppliers to ensure compliance with its standards, provides training and resources, and collaborates with stakeholders to promote respect for human rights.
- 6.4 The Company is committed to upholding the following human rights principles in its operations:

- i. **Non-Discrimination:** The Company does not discriminate against anyone on the basis of their age, race, regional origin or ancestry, personal beliefs, gender, nationality, religion, sexual orientation, marital status, religious/spiritual practices, or any other status.
- ii. **Human Dignity:** The Company respects the inherent dignity of all individuals and does not engage in any activities that undermine this principle.
- iii. **Freedom of Association:** The Company recognizes the right of individuals to form and join associations and trade unions.
- iv. **Labour Rights:** The Company upholds the rights of all workers, including the right to fair wages, safe working conditions, and freedom from exploitation. All workers have the rights of collective bargaining as a fundamental rights. The Company extends all labour-related policies to third-party workers and contractors to ensure fair treatment and promote a culture of respect and fairness.
- v. **Child Labour Prevention:** The Company does not employ child labour. Any employee and worker who are under the age of 18 years are not employed by the Company or its subsidiaries and its value chain. The Company ensures Zero tolerance for Child labour and Forced labour in operations and supply chain and undertaking due diligence to identify risks and take adequate measures for mitigation. The enforcement of measures such as monitoring and audit of suppliers helps in ensuring compliance with standards, provide training and resources, and collaborate with stakeholders to promote respect for human rights
- vi. **Forced labour Elimination:** The Company is committed to respecting human rights and eliminating forced labour in any of its operations and supply chain. The Company conducts due diligence to identify and assess the risk of forced labour, take measures to prevent and mitigate it, address instances of forced labour and engage with stakeholders to promote awareness and respect for human rights. The Company does not retain any employee identification papers or require them to deposit money as a condition of employment. The Company ensures that its suppliers and business partners uphold the same standards. The Company continually improves its practices to prevent forced labour and trafficking.
- vii. **Environmental Responsibility:** The Company is committed to sustainable practices that minimize harm to the environment and respect the rights of future generations. The company is committed to the responsible use of potentially hazardous chemicals and compliance with applicable laws and regulations, implement safety procedures, monitor use of hazardous chemicals, engage with suppliers, and continuously improve management practices to minimize risks to health, the environment, and communities
- viii. **Safe working conditions:** The Company provides safe and healthy work environment for our employees and workers, taking steps to prevent workplace incidents, accidents and ensuring that employees and workers have access to necessary protective equipment. Health and safety of all its employees and

workers across value chain are of utmost importance to us. The company believes in providing a safe and healthy working environment in line with the ILO Declaration on Fundamental Principles and Rights at Work.

- ix. **Documentation and reporting of accidents, near misses, and illnesses:** The Company is committed to a safe and healthy work environment including its willingness to address incidents. This includes reporting procedures, documentation requirements, confidentiality and privacy measures, investigation procedures and taking immediate corrective actions.
- x. **Indigenous Rights:** The Company respects the rights of indigenous people and communities, including their right to land, resources, and self-determination.
- xi. **Community Engagement:** The Company engages with the communities, understand their needs and concerns. The Company works with communities to develop solutions that promote mutual respect and benefit.
- xii. **Fair compensation:** The Company ensures that employees are paid fairly for their work, including providing equal pay for equal work regardless of gender, nationality, race etc. Employees and workers are offered fair pay solely based on their performance, calibre, educational qualifications, and at no point through the hiring or promotion process is there be any discrimination.
- xiii. **Benefits:** The Company provides all benefits including Maternity and Paternity leave for employees for the period as prescribed under the Applicable Laws, without risk of such employees losing their employment or responsibilities. The Company ensures benefits are provided to its workers in accordance with Applicable Laws. Educational leave and opportunities are provided to the employees and workers for self-development.
- xiv. **Harassment-free workplace:** The Company takes steps to prevent and address any form of harassment, including sexual harassment, bullying, and intimidation.
- xv. **Fair Retrenchment:** The Company is committed to protecting rights and respect of its employees in the process of retrenchment with fair and transparent process. Each of the processes are linked with the policies of the Company and the terms of appointment. The company believes in ensuring the rights of employees are respected and protected through fair retrenchment procedures and providing notice period to affected employees, severance packages. And other benefits provided in compliance with country law and any support that to be offered to affected employees in finding alternative employment.
- xvi. **Protection of migrant contract or temporary workers:** The Company ensures inclusion and protection to migrant, contract, or temporary workers in its human rights policy. The Company ensures that any vulnerable group/s are treated fairly and with respect at the workplace.
- xvii. **Freedom of movement:** The Company respects the fundamental human right of freedom of movement and do not restrict or discriminate against the

movement of its employees, customers, or stakeholders. The Company expects its suppliers and business partners to uphold the same standards.

7. Implementation

- 7.1 The Company implements this Policy in the following manner:
- i. Incorporating human rights considerations in all our business operations and decision-making policies and processes.
 - ii. Providing regular training to our employees and business partners on human rights issues, policy and its implementation.
 - iii. Undertaking formally defined measures to align conduct of all employees on human rights related aspects.
 - iv. Conducting due diligence/ Audit to identify and assess potential human rights policy adherence in our operations annually.
 - v. Due diligence assessment of suppliers to identify risks and take adequate measures for mitigation.
 - vi. Monitoring and audit of suppliers to ensure compliance with standards, provide training and resources, and collaborate with stakeholders to promote respect for human rights.
 - vii. Developing and implementing strategies to prevent and mitigate any adverse human rights impacts of our operations.
 - viii. Company will appoint an ambassador to drive this policy across the organization and ensure that any complaints/ feedback are acted on suitably.
 - ix. Providing effective mechanisms for individuals and communities to raise human rights concerns and seek redress.
 - a. Reporting systems to address the violations is defined as per various forms of grievances, anonymous reporting, and CEO Connect & CHRO Connect portals.
 - b. Detailed investigation while maintaining anonymity of the stakeholder reporting the violation is maintained.
 - c. Disciplinary/corrective action is implemented through an efficient and time based system.
 - d. Governance of ensuring appropriate reporting to the highest Human Resource authority at the group level is ensured.

As a renewable energy company, and as a commitment to ensure Responsible Business Conduct, the Company respects and promotes human rights in all aspects of its operations and also ensures commitment by its suppliers and business partners. The Company is committed to upholding fundamental human rights principles and to implementing the actions necessary to ensure that the Company and all stakeholders meet this commitment. The Company recognizes that this is an ongoing process, and it will continue to review and improve its human rights policies and practices.
