

## LABOUR & HUMAN RIGHTS POLICY

(Applicable to all locations: Vatva GIDC – Ahmedabad & Sayakha – Gujarat)

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**Approved by:** Managing Director

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### Preamble

Crystal Quinone Pvt. Ltd. (CQPL) is a manufacturer of fine chemicals, specialty intermediates, dye intermediates and CDMO products operating at two sites in Gujarat, India — **Vatva GIDC, Ahmedabad** and **Sayakha**. CQPL firmly believes that the dignity, safety, rights and well-being of every individual working at or for our organisation are fundamental to sustainable business success. This Labour & Human Rights Policy establishes CQPL's commitments across all aspects of employment, workplace safety, social dialogue, training, and protection from exploitation and discrimination.

CQPL is a signatory of the United Nations Global Compact (UNGC) and is committed to upholding and advancing the Ten Principles of the UNGC on human rights, labour standards, environmental responsibility and anti-corruption in all its operations and business relationships.

This policy applies to all employees (permanent, temporary, contract and apprentice), management, trainees and third-party workers at both CQPL locations. It is aligned with applicable Indian labour legislation, ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, and Labour & Human Rights sustainability requirements.

### 1. Employee Health and Safety

CQPL recognizes that chemical manufacturing involves significant occupational health and safety risks, and is committed to providing a safe and healthy working environment for all employees and contractors. CQPL is committed to:

- Complying with all applicable occupational health and safety laws and regulations, including the Factories Act 1948, The Occupational Safety, Health and Working Conditions Code 2020, MSIHC Rules, PESO regulations and applicable GPCB/CPCB requirements at both sites.

- Implementing and maintaining a formal Occupational Health & Safety Management System (OHSMS) aligned with ISO 45001, covering hazard identification, risk assessment, risk control and incident investigation for all site operations.
- Providing all employees and contractors with appropriate Personal Protective Equipment (PPE) and ensuring its correct use through training, supervision and enforcement.
- Conducting regular safety inspections, job hazard analyses (JHA), process safety reviews and emergency drills to proactively identify and eliminate or control workplace hazards.
- Maintaining fully equipped first-aid facilities and trained first-aiders at each site, and ensuring prompt access to medical treatment in the event of a workplace injury or illness.
- Investigating all workplace accidents, near-misses and occupational illnesses in a structured, root-cause manner, and implementing corrective and preventive actions to prevent recurrence.
- Monitoring occupational health through periodic medical examinations for employees exposed to hazardous chemicals, noise, heat or other occupational health risks, in accordance with applicable legal requirements.
- Setting and tracking KPIs for occupational health and safety performance (e.g. LTIFR, TRIFR, near-miss frequency) and using these to drive continuous improvement.
- Communicating safety information, procedures and emergency plans to all workers in a language and format they can understand.

## **2. Working Conditions**

CQPL is committed to providing fair, lawful and humane working conditions for all employees at both sites. CQPL is committed to:

- Complying with all applicable Indian labour laws and regulations governing wages, working hours, overtime, leave entitlements, social security and employment terms, including the Minimum Wages Act, Payment of Wages Act, Code on Wages 2019, and Employees' State Insurance (ESI) and Provident Fund (PF) obligations.
- Ensuring that all employees receive written employment contracts or appointment letters clearly specifying their role, compensation, working hours, leave entitlements and applicable terms and conditions of employment.

- Paying all employees at least the statutory minimum wage applicable to their category and location, on time and in full, with transparent pay slips provided for every payment period.
- Limiting working hours and overtime to those permitted under applicable law, ensuring that all overtime is voluntary, appropriately compensated and does not endanger employee health or safety.
- Providing all statutory leave entitlements including annual leave, sick leave, maternity/paternity leave and public holidays, and facilitating their timely and fair utilisation.
- Ensuring safe, clean and adequate workplace facilities including sanitation, drinking water, rest areas and canteen facilities, in line with Factories Act requirements.
- Respecting employees' right to a work-life balance and refraining from practices that require unreasonable working hours or impose excessive physical or psychological demands on workers.
- Maintaining all required statutory registrations, licences and filings related to employment at both Vatva and Sayakha sites.

### 3. Social Dialogue

CQPL believes that open, constructive and respectful communication between management and employees is essential for a healthy, productive and fair workplace. CQPL is committed to:

- Respecting employees' rights to freedom of association and collective bargaining as provided under applicable Indian law, including the Industrial Disputes Act, Trade Unions Act and applicable provisions of the Labour Codes.
- Providing effective channels for employees to raise concerns, suggestions and grievances without fear of retaliation, intimidation or adverse employment consequences.
- Maintaining a formal, accessible and confidential **Grievance Redressal Mechanism** at each site, with defined timelines for acknowledgement, investigation and resolution of employee complaints.
- Conducting regular structured communication between management and employees through toolbox talks, town halls, departmental meetings, safety committees and notice boards, ensuring timely and transparent sharing of information on matters that affect employees.

- Consulting employees or their representatives, where applicable, on significant changes to working conditions, health and safety measures, and organisational matters, in accordance with legal requirements.
- Engaging with workers through participatory safety committees and similar bodies to jointly identify workplace hazards, review incidents and propose improvements.
- Maintaining a zero-tolerance stance on retaliation against any employee who raises a concern, reports a violation or participates in a legitimate labour dispute or grievance process.

#### **4. Career Management and Training**

CQPL is committed to the professional development, skills enhancement and career growth of all employees. CQPL is committed to:

- Providing all new employees with a structured induction and onboarding programme covering company values, safety procedures, job-specific skills, environmental responsibilities and applicable policies.
- Conducting regular training needs assessments for all roles and ensuring that training plans are developed and implemented to address identified gaps in knowledge, skills and competencies.
- Providing mandatory training on occupational health and safety, chemical handling, emergency response, environmental compliance and applicable regulatory requirements for all employees in relevant roles.
- Offering opportunities for skill development, career advancement and cross-functional learning, including technical training, process certifications, external courses and professional development programmes.
- Maintaining accurate training records for all employees and using these to demonstrate regulatory compliance and support Sustainability and customer audit requirements.
- Evaluating training effectiveness through assessments, practical demonstrations and on-the-job observation, and improving training content and delivery based on feedback and outcomes.
- Applying fair, transparent and merit-based criteria for promotions, salary reviews and career advancement opportunities, free from bias or discrimination.

- Supporting the development of local talent at both Vatva and Sayakha sites by prioritising local recruitment and providing structured skill-building pathways for entry-level and semi-skilled workers.

## **5. Child Labour, Forced Labour and Human Trafficking**

CQPL has a zero-tolerance policy for child labour, forced labour, bonded labour and human trafficking in all its operations and supply chain. CQPL is committed to:

- Never employing any person below the minimum legal working age as defined under the Child and Adolescent Labour (Prohibition and Regulation) Act 1986 and applicable amendments, or below 18 years of age in any hazardous process or location, without exception.
- Verifying the age of all new employees through official government-issued documents (Aadhaar, birth certificate or equivalent) at the time of recruitment, and maintaining these records for audit purposes.
- Never using, facilitating or benefiting from forced labour, bonded labour, debt bondage, prison labour or any other form of involuntary labour in any CQPL operation.
- Ensuring that all employment is freely chosen, that employees are free to resign without penalty with reasonable notice, and that no worker's identity documents, passports or personal property are retained by the company.
- Not using labour brokers, contractors or staffing agencies that engage in deceptive recruitment, excessive recruitment fees or practices that create debt bondage for workers.
- Extending these requirements to CQPL's supply chain through supplier communication, code of conduct requirements and, where relevant, supplier assessments, to ensure that no tier of CQPL's supply chain uses child or forced labour.
- Immediately reporting any identified or suspected cases of child labour, forced labour or human trafficking to appropriate authorities, and cooperating fully with any resulting investigation.
- Training relevant HR and procurement staff to recognise signs of forced labour and human trafficking in the workforce and supply chain.

## **6. Discrimination and Harassment**

### **Crystal Quinone Pvt. Ltd.**

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CQPL is committed to a workplace that is free from all forms of discrimination, harassment, bullying and victimisation, and where every individual is treated with dignity and respect. CQPL is committed to:

- Ensuring equal opportunity in all aspects of employment including recruitment, selection, placement, promotion, compensation, training, transfer and termination, without discrimination on grounds of gender, age, religion, caste, race, ethnicity, nationality, disability, pregnancy, marital status, sexual orientation or political opinion, in line with applicable Indian law and international standards.
- Maintaining a formal **Prevention of Sexual Harassment (POSH) Policy** and constituting an Internal Complaints Committee (ICC) at each site, as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, and ensuring employees are aware of the ICC process and their rights.
- Defining clearly and communicating to all employees that harassment — including sexual harassment, verbal abuse, intimidation, bullying and any other form of unwanted conduct that creates a hostile work environment — is strictly prohibited and will result in disciplinary action.
- Providing confidential reporting mechanisms for employees to raise concerns about discrimination, harassment or victimisation, and guaranteeing protection from retaliation for those who report in good faith.
- Investigating all complaints of discrimination and harassment promptly, impartially and confidentially, and taking proportionate corrective and disciplinary action where violations are established.
- Conducting regular awareness and sensitisation training for all employees and managers on respectful workplace behaviour, anti-discrimination principles, POSH compliance and unconscious bias.
- Periodically reviewing HR data (recruitment, promotion, compensation, disciplinary actions, attrition) to identify and address any patterns of systemic discrimination or unequal treatment.

### **General Commitments**

In support of all our Labour and human right area, CQPL is committed to:

- Complying with all applicable national and state labour laws, regulations and court or tribunal orders at both Vatva and Sayakha sites, and monitoring regulatory developments to maintain ongoing compliance.
- Communicating this policy to all employees, contractors and suppliers in a language and format they can understand, and making it available publicly on request.
- Integrating labour and human rights considerations into procurement and supplier selection decisions, and requiring key suppliers to adhere to equivalent standards through CQPL's Supplier Code of Conduct.
- Conducting periodic internal audits and management reviews of labour and human rights compliance, and using findings to drive continuous improvement.
- Reporting on labour and human rights performance as part of CQPL's sustainability disclosures, including assessments, customer questionnaires and applicable regulatory reporting.

**Approved by: Aniket Shah**

Managing Director

Crystal Quinone Pvt. Ltd.

Date: 14 / 01 / 2026

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This policy supersedes any previously issued individual policies on occupational health and safety, working conditions, grievance handling or anti-discrimination at CQPL. It is to be reviewed annually or when significant changes in legal requirements or business operations occur.