



Pharmanza Herbal Pvt. Ltd.
Plot No 214, Borsad Tarapur Road, Kaniya - 388430

Human Rights Policy -
Pharmanza Herbal Pvt. Ltd.

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1. OVERVIEW

Pharmanza Herbal Pvt. Ltd. recognizes the valuable role that business can play in the longer-term protection of human rights of all the employees. The Company is committed to respecting the human rights of our workforce, communities, and those affected by our operations wherever we do business including our vendors. This policy applies to Pharmanza Herbal Pvt. Ltd., the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. Pharmanza Herbal Pvt. Ltd. is guided by fundamental principles of human rights, such as those enumerated in the United Nations Guiding Principles on Business and Human Rights, United Nations Universal Declaration of Human Rights, United Nations Global Compact, and International Labour Organization's Conventions.

Our Human Resource Policy is aimed at fostering socio-economic empowerment through inclusive growth. This policy document provides a broad framework to ensure that all employees are treated with respect and dignity and common set of principles that apply to our business practices to ensure that we do not condone human rights violations or abuses. We adhere to the policy by respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing, and minimizing potential adverse impacts through due diligence and management of issues, and resolving grievances from affected internal stakeholders effectively. It reflects with our belief that as an organization our actions must have a positive impact on the future of all our internal stakeholders. Corporate Human Resources is responsible for reviewing and updating standards on social policies, and for providing guidance and support to all concerned.

This Policy of Human Rights practice for company comprises below clauses:

- Child Labour
- Forced and Compulsory Labour
- Health and Safety
- Freedom of Association and Right to Collective Bargaining
- Discrimination
- Disciplinary Practices
- Working Hours
- Remuneration
- Management Systems

1.1 SCOPE

This policy is applicable for all internal Stakeholders of Pharmanza Herbal Pvt. Ltd.



2. POLICY

We recognize that we are part of the communities in which we operate. We engage with people from different communities' groups. Our aim is to ensure through dialogue that we are listening to, learning from, and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. This includes issues in our company, across our value chain, through which we seek to promote respect for human rights.

We endeavor to achieve adherence to the human rights policy by:

2.1 COMPLIANCE WITH LABOUR LAWS

- Maintaining positive legal compliance with applicable constitutional and regulatory human rights requirements.
- Aligning our existing policies, processes, and activities with our commitment to respect human rights, including those that apply to labour practices.
- Ensuring full compliance with applicable wage, work hours, overtime and benefit laws.
- Abiding by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- Complying with applicable labour and employment laws wherever we operate. Any employee who believes a conflict arises between the language of the policy and the laws, customs, and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management or Human Resources Department.
- Committing to protect the data privacy of employees (including ex-employees and retirees), customers and vendors. we do not disclose information to third parties without explicit consent of our internal stakeholders, unless required by law to do so.

2.2 CONTINUOUS ENGAGEMENT

- Creating awareness of the human rights amongst our employees at various levels of our operations through communication.
- Aiming to create workplace in which open and honest communications among all employees are valued and respected.
- Engaging with all internal stakeholders in an inclusive, transparent, and culturally appropriate manner on human rights concerns related to our business activities.
- Developing goodwill, creating employment and economic opportunities in the communities that host our activities.
- Establishing clear accountability by assigning adequate resources and responsibilities for



effective management of human rights risks; and continually improving human rights performance by sharing good practices and learning, setting, and reviewing targets, and monitoring, reporting, and disclosing performance.

2.3 DIVERSITY AT WORKPLACE

- Valuing and advancing diversity, equal opportunity, and the need to consider the rights of women and minorities; and associated special care and assistance, Assistance to persons with disability.
- Our diversity philosophy celebrates the common values that bring joy, happiness, energy, and enthusiasm to the community and focuses on bridging differences by enhancing commonalities among the diverse work pool.
- To ensure diversity of our workforce, Pharmanza Herbal Pvt. Ltd. exercises positive discrimination in favor of socially disadvantaged communities provided potential employees fulfill its merit-based criteria. These systems and processes are monitored for compliance and subject to continuous improvement.

2.4 HARASSMENT FREE WORKPLACE

- Maintaining workplace that is free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills, and experience.
- Prohibiting all forms of harmful child labour, forced / trafficked labour including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.
- No person below the age of 18 years should be engaged by us and any of our internal stakeholders at any point, and in the event of discovery of such a case, liabilities for suitable remediation and ensuring well-being of the child would accrue to the defaulting party.
- Committing to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.
- Prohibiting any contribution to armed conflict or human rights abuses in conflict-affected and high-risk areas.
- Recognizing the employees' right to assemble, communicate and join association of their choice in matters related to their employment within the purview of the policies and procedures of the Company.

2.4 SUPPORT AND RESPECT FOR INTERNATIONALLY PROCLAIMED HUMAN RIGHTS

- As part of our commitment to the United Nations Global Compact, we have a responsibility to



uphold human rights in our workplace and within our sphere of influence.

- To this accord, we follow the below steps:
 - Develop and encourage a transparent and rights aware approach in our business operations.
 - We have also formed appropriate grievance redressal mechanism to report any human rights concerns.
 - The Grievance redressal mechanism ensures that No reprisal or retaliatory action will be taken against any internal stakeholder for raising concerns under this policy.

2.5 FREEDOM OF ASSOCIATION

- We believe Freedom of Association is a fundamental right as proclaimed in the Universal Declaration of Human Rights. The right of workers and staff to form and join organizations of their own choosing is an integral part of a free and open society. It ensures that everyone's voice is heard and essential for functioning of not only labour markets but overall corporate governance of the Company.
- We respect employee's right to join, form or not to join a labour union without fear of reprisal, intimidation, or harassment, where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives.
- We believe collective bargaining is a fundamental right as stated in the ILO Constitution. Collective bargaining can be key measure through which employees, organizations and trade unions can establish fair wages and working conditions and ensure equal opportunities between women and men. It also provides for sound labour practices. Typical issues on the bargaining agenda can include wages, working time, training, occupational health and safety and equal treatment, etc. The objective of these negotiations is to arrive at a collective agreement that regulates terms and conditions of employment. Collective agreements may also address the rights and responsibilities of the parties thus ensuring harmonious and productive industries and workplaces. Enhancing the inclusiveness of collective bargaining and collective agreements is a key means for reducing inequality and extending labour protection.
- PHARMANZA is part of the PHARMA industry, which generally has less labour unions as compared to other industry. We introduce very transparent informative system and taking very much care of each employee so that employees satisfied with working environment and system. We have always gone beyond the legal compliance for the welfare of our companies, we provide our employees with much higher wages than the minimum wages of the Land.
- We have mentioned all details relating to wages, bonuses, working hours, benefits, allowances, terms of employment, holidays, working conditions, etc. in the induction programme of the employee.
- The company is committed to bargaining in good faith with representatives.

2.6 HEALTHY AND SAFE WORKPLACE



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- Providing a healthy workplace and comply with applicable health laws and regulations, as well as internal requirements. Also provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.
- Encouraging employees to highlight concerns or health/security hazards to the management.

2.7 GRIEVANCE REDRESSAL MECHANISM

- We implement the above standards by incorporating it in related policies, processes, and guidelines across all our business operations.
- We believe that an empowered workforce is the best way to receive feedback and identify improvement areas.
- No reprisal or retaliatory action will be taken against any internal stakeholder for raising concerns under this policy. We investigate, address, and respond to the concerns and take appropriate corrective action in response to any violation.
- To address employee concerns and complaints pertaining to human rights and decent labour practices, a Grievance Redressal Procedure with appropriate systems and mechanisms has been and is backed by policies and statutory provisions. Implemented through policy, it allows for open and structured discussions on grievances raised on these issues and their resolution in a fair manner.
- We maintain a “Zero Tolerance” approach to Sexual harassment. Also, as per the regulatory requirement we have also formulated a “COMMITTEE” and an Internal Complaint Committee to address such incidents as and when reported. Further to address any act of misconduct, we have the internal complaint committee which takes up the matter. The composition of the committee is as well as the contact details are as below:

Sr. No.	Name	DESIGNATION	Role	Contact Details
1	Mr. Vinit Thakkar	HR - Manager	Special Counselor	8487050016
2	Mr. N. K. Patil	Plant - Manager	Head – Complaint Committee	9427312027
3	Mr. Brijmohan BIRTHARIA	Factory – Manager	Member	8511893116
4	Ms. Nikeeta Mulani	HR – Manager	Member	7043838090

- We also have the dedicated channels to report any Human Rights Issue:
 - Contact Number: 8487050016
 - Email Id: hrm@pharmanza.com



3. ALIGNMENT WITH UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

All our business policies related to Human Rights are guided by United Nations Guiding Principles on Business and Human Rights. We aim to identify, assess, and address the human rights impact of not only our business operations (including all our employees) but also our associated partners. Our commitment to respect human rights of individuals and communities at large is reflected in our complete business operations and is integrated in our company policies and processes.

3.1 KEY INTERNAL STAKEHOLDERS CONSIDERED WHILE ADDRESSING THE HUMAN RIGHTS ISSUES

- **Employees: -**

We respect human rights of all our employees, including full time employees as well as outsourced ones. Our HR policies address human rights issues, and we continuously work with our employees to assess the impact of our actions with respect to various human rights. We identify vulnerable groups such as women, especially abled employees, etc. and pay special attention to them since they tend to be at greater risks of negative human rights impact. We have an internal complaint mechanism for employees who wish to raise any issues related to human rights violation by the organization / any individual within the organization.

- **Business Partners : -**

We closely work with our partners to ensure that no human rights violation occurs while providing services to them. We have defined a Model Code of Conduct for our employees which covers all aspects of human rights related to employees. Hence, we work closely with all our employees to ensure that they give importance to respecting human rights the same way that we do.

3.1 ACTIONS AND PROCEDURES WE UNDERTAKE TO MEET OUR COMMITMENT

Our progress on aspects of Human Rights is owned by the Business and Functional leadership teams and is under the review and oversight of our Management Review Meeting. We identify and manage Human Rights impacts, risks and opportunities that continuously help strengthen our workplace policies, practices, and programs. To ensure that we meet our commitments related to human rights we take the following actions involving all the relevant internal stakeholders.



Training and Implementation of all policies and process related to Human Rights

Employee Level: – We have defined our Human Rights Policy and Model Code of Conduct for employees which cover all aspects of Human rights. We work with our employees on regular basis by providing them training on these aspects.

3.2 INTERNAL AUDIT AND CERTIFICATION RELATED TO HUMAN RIGHTS

We are certified with ISO 9001:2015 & 22000:2018 Quality, Health and Food Safety Management System to mitigate any factors that can cause employees and business irreparable harm. The goal of this certification is to provide a healthy and safe working environment for our employees and everyone who visits any of our workplaces. Annual audits are carried out by a third-party auditor while renewal of the certification. We conduct various internal audits at regular intervals to ensure no violation of human rights is taking place at our Company.

4. COMPLIANCE OF THE HUMAN RIGHTS POLICY

Internal Stakeholders are expected to comply with this and all applicable Pharmanza Herbal Pvt. Ltd. policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities, where we have sound reason to believe that our internal stakeholders infringe Human Rights, we reserve the right to cease those relationships as warranted.

Specific to this policy, Internal stakeholders are expected to:

- Never infringe on human rights.
- Be alert to any evidence of human rights infringements in our direct operations or in the operations of our company and report any situation in which a human rights infringement is suspected.

5. ISO 9001:2015 QMS & ISO 22000:2018 HEALTH AND FOOD SAFETY MANAGEMENT SYSTEM

Pharmanza Herbal Pvt. Ltd. is certified with ISO 9001:2015 & ISO 22000:2018. This standard goal is to help business to provide a healthy and safe working environment for their employees and



everyone else who visits the workplace. Since Pharmanza Herbal Pvt. Ltd. goal is the safety of its employees and stakeholders and we have achieved it by controlling all the factors that could potentially lead to injury, illness and — in extreme situations — even death. This standard helped us to develop better and more robust occupational health and safety measures. We have demonstrated our commitment to occupational health and safety management within the organization and protect our employees as well as protecting the future health of our organization. This improved our employee's satisfaction, retention and improved employee's health, increased productivity, and reduced absenteeism.

6. APPLICABILITY

This Policy will be applicable from 1st April 2022.