



HUMAN RIGHTS POLICY

As one of the world's leading carbon materials manufacturing companies, Birla Carbon and its affiliate companies create products that contribute to an enhanced standard of living for people throughout the world.

Birla Carbon recognizes the valuable role that business can play in the longer-term protection of human rights. Through our parent company, the Aditya Birla Group, whose sustainability framework has been certified as conforming to the requirements of the UN Global Compact (UNGC), we have also aligned our strategy, adhering to the 10 principles of the UNGC. We are committed to respecting the human rights of our workforce, communities, contractors, suppliers and those affected by our operations wherever we do business in line with internationally recognized frameworks.

Our commitments entail respecting human rights and seeking to avoid involvement in human right abuses, identifying, assessing and minimizing potential adverse impacts through due-diligence and management of issues, and resolving grievances from affected stakeholders effectively.

Every Birla Carbon site shall endeavor to:

- Maintain positive compliance with applicable constitutional and regulatory human rights requirements;
- Undertake an iterative, due-diligence process to identify, assess and manage potential risks and impacts;
- Align our existing policies, processes and activities with our commitment to respect human rights, including those that apply to labor practices, engagement with indigenous peoples, land acquisition, supply chain, and security management;
- Promote awareness of the human rights with employees at various levels of our operations through training and communication;
- Engage with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities;
- Value diversity, equal opportunity and the need to consider the rights of vulnerable groups such as indigenous peoples, women, migrant workers and other minorities;
- Prohibit all forms of harmful child labor, forced/trafficked labor, discrimination and harassment;

- Provide access to remedy by resolving grievances in a timely and culturally appropriate manner;
- Influence our contractors, suppliers and other organizations with whom Birla Carbon has leverage to encourage and support the development of equivalent management systems;
- Develop goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities;
- Establish clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks; and
- Continually improve human rights performance by sharing good practices and learnings, setting and reviewing targets, and monitoring, reporting and disclosing performance.
- Promote personal accountability for security.



Dale Clark

Chief Manufacturing Excellence Officer