

Numaligarh Refinery Limited (NRL) – Human Rights Policy

1. Introduction & Philosophy

“Empowering People, Upholding Rights”

At Numaligarh Refinery Limited (NRL), we believe that upholding human rights for the workforce is a fundamental responsibility and a cornerstone of sustainable business. We are committed to protecting the dignity, equality, and freedom of every individual connected to our organization including employees, contract workers, suppliers, business partners, customers, and communities impacted/ influenced by our operations.

Our philosophy is inspired by the Constitution of India, the Universal Declaration of Human Rights (1948), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) Core Conventions, and the National Guidelines on Responsible Business Conduct (NGRBC).

We also draw strength from India’s ethos of trusteeship, as envisioned by Mahatma Gandhi, believing that our resources and capabilities must be managed responsibly for the benefit of society.

2. Purpose & Objectives

This policy seeks to:

- Provide clear guidance for the protection and promotion of human rights across NRL’s operations and value chain.
- Ensure a safe, fair, and non-discriminatory workplace for all employees and workers.
- Embed ethical business practices following alignment with globally accepted standards.
- Prohibit forced labour, child labour, discrimination, and harassment in every form.
- Encourage transparent reporting and continuous improvement in human rights practices.

3. Scope & Applicability

This policy applies to:

- All employees (permanent, temporary, trainees, and apprentices).
- All contract workers, suppliers, business associates, and contractors.
- Joint ventures, subsidiaries, and third-party partners under NRL’s influence.
- Local communities and stakeholders impacted in our area of operation.

4. Key Human Rights Commitments

(a) Equal Opportunity, Diversity & Inclusion

- We are an equal opportunity employer with zero tolerance for discrimination based on caste, creed, religion, gender, age, disability, sexual orientation, race, colour, marital status, or any other status protected by law.
- Recruitment, training, promotion, and compensation are based on merit, skills, and performance.
- We promote a workplace culture that values diverse perspectives and inclusive practices.
- Facilities and opportunities are extended to support persons with disabilities (PwD) and underrepresented groups.
- The organization implements a respectful workplace culture through which employees must adhere to complete non-discrimination policies regarding workplace conduct.

(b) Freedom of Association & Collective Bargaining

- Employees have the freedom to join/ form trade unions, associations, or representative bodies, as permitted by law.
- We recognize the right to collective bargaining and engage in constructive dialogue with unions and employee representatives.
- Labour representatives have freedom to express employee concerns about wages and workplace policies as well as working conditions to official workplace organizations.
- The company recognizes employees' right to participate in legitimate union activities and workplace conversations while protecting them from any form of threats or detrimental actions.
- NRL ensures that such engagement is based on mutual respect, transparency, and good faith.

(c) Non-Retaliation

- NRL prohibits retaliation against anyone who raises genuine concerns or reports misconduct relating to any aspects of business including human rights.
- Confidentiality and fairness are ensured in grievance investigations.
- Strict disciplinary action is taken against retaliatory behaviour.

(d) Respect for Employee Rights

The fundamental rights of employees and value chain partners at Numaligarh Refinery Limited (NRL) receive dedicated protection as the organization maintains a workplace environment

based on dignity and equality under fairness principles. The company's initiatives in employee rights include but are not limited to:

- Compliance with labour laws, fair wages, working hours, leave entitlements, and social security benefits.
- Upholding the right to safe working conditions and freedom from harassment or exploitation.
- Promoting work-life balance and employee wellness initiatives.

(e) Harassment-Free Workplace

Numaligarh Refinery Limited (NRL) dedicates itself to providing all employees business associates and stakeholders with a workplace free from harassment and abuse. Our organization strictly prohibits every type of harassment at work and includes the following measures:

- Zero tolerance towards sexual harassment, bullying, intimidation, or hostile conduct.
- Full compliance with the POSH Act, 2013 and other applicable laws.
- A legally mandated Internal Complaints Committee (ICC) ensures confidentiality, impartiality, and fair redressal.
- Regular gender sensitization and workplace behaviour training are conducted.

(f) Inclusive Workplace

At Numaligarh Refinery Limited (NRL), we place diversity and inclusion at the heart of our values. We are committed to building workplaces that provide equal opportunities for all, irrespective of gender, age, background, or other demographic differences. Diversity guides our hiring practices, while structured training, mentoring, and leadership development programs ensure that every employee has the opportunity to learn, grow, and progress in their career.

(g) Safe & Healthy Workplace

- The company adopts Occupational Health and Safety (OHS) policies, OHS risk management procedures to safeguard every employee in addition to contracted personnel and visitors.
- The company conducts regular safety evaluations in combination with employee safety education activities while creating emergency action plans.
- The company provides Compensation and support in case of injury, incapacity, or loss of life as per applicable policies and laws.

(h) Prohibition of Child Labour & Forced Labour

Numaligarh Refinery Limited (NRL) maintains the highest possible employment ethics through a strict policy ban which prohibits both child labour and bonded labour together with forced labour and modern slavery for all parts of our operations and supply chains.

- No forced, bonded, or trafficked labour in any form is permitted in the Company.
- Compliance of labour laws is mandatory by contractors and suppliers.
- NRL cooperates with government agencies alongside organizations to confront exploitative labour practices and at the same time it helps create substantial fair employment possibilities.

(i) Right to Privacy & Data Protection

NRL recognizes that the protection of personal information is a fundamental right. In an increasingly digital business environment, safeguarding the privacy and data of employees, customers, and partners is central to maintaining trust. We are committed to handling all information responsibly, with transparency, and in compliance with applicable laws and global best practices.

- Compliance with the Information Technology Act, 2000, relevant data protection laws, and international privacy standards.
- Training in Cybersecurity Awareness: NRL provides data privacy education to its staff members and stakeholders through broad cybersecurity awareness sessions.
- Collection and use of personal data only with informed consent, supported by secure systems and strict confidentiality.

(j) Ethical Business Practices (Anti-Corruption & Bribery)

NRL conducts its business with integrity, fairness, and transparency. We have zero tolerance for corruption, bribery, or unethical conduct across our operations and value chain. Our systems, policies, and oversight mechanisms ensure that decision-making processes are free from undue influence and reflect the highest ethical standards.

- Zero tolerance towards bribery, corruption, and unethical practices in any form.
- Adherence to the Integrity Pact, Vigilance Manual, Whistleblower Policy, and Code of Conduct for Directors, senior management, and employees.
- Transparent and accountable procurement and decision-making processes.

(k) Environmental Stewardship & Climate Action

NRL views environmental protection and climate responsibility as integral to long-term sustainability. We are committed to minimizing our ecological footprint and contributing to India's climate goals by adopting responsible practices, conserving resources, and investing in cleaner technologies.

- Commitment to sustainability, resource efficiency, and pollution prevention in all operations.
- Progressive steps towards energy transition and carbon reduction goals, in alignment with national priorities.

- Integration of environmental and social impact assessments into business planning and project execution.

(I) Community Engagement & Indigenous Rights

NRL recognizes that strong, respectful relationships with local communities are essential for sustainable growth. We are committed to engaging with communities in a transparent and participatory manner, respecting their cultural heritage and traditions, and supporting inclusive development.

- Respect for the values, customs, and traditions of local and indigenous communities.
- CSR initiatives focused on healthcare, education, skill development, and livelihood enhancement.
- Open channels for dialogue with vulnerable and marginalized groups to address their concerns effectively.

5. Implementation & Due Diligence

NRL is committed to embedding human rights principles into all aspects of its operations and value chain. We adopt a structured approach to identify, prevent, and mitigate risks by integrating human rights considerations into decision-making and business practices. This ensures that our policies are not just aspirational but actively shape everyday conduct across the organization and its value chain.

- Embedding human rights principles into daily operations and decision-making.
- Conducting due diligence and risk assessments across business units and supply chains.
- Carrying out regular audits, inspections, and corrective actions where risks are identified.
- Collaborating with external experts and stakeholders to strengthen compliance and accountability.

6. Training & Capacity Building

Awareness and education are key to building a culture of respect for human rights. NRL ensures that all employees, contractors, and business partners understand their responsibilities through structured training programs and continuous engagement. NRL maintains its human rights promotion effort through education initiatives alongside training programs and an open dialogue platform.

- Regular training and engagement for employees and other stakeholders on human rights, workplace ethics, POSH compliance, and OHS standards.
- Induction-level orientation for all new employees.
- Gender sensitization and diversity awareness workshops.

- Engagement programs to encourage employee participation and feedback.

7. Grievance Redressal Mechanism

NRL provides a safe and transparent mechanism for employees and stakeholders to raise concerns without fear of retaliation. Our grievance redressal framework is accessible, confidential, and time-bound, ensuring fair treatment for all complaints. Every employee receives protection through safe practices and confidentiality during the grievance resolution process which includes independent scrutiny leading to immediate corrective measures.

8. Transparency & Reporting

NRL believes that transparency builds accountability. We report our performance on human rights in a structured and open manner, allowing stakeholders to assess our progress and provide feedback. Our reporting practices align with recognized global frameworks to ensure credibility.

- Commitment to publish performance on human rights through the Annual Sustainability Report and Business Responsibility and Sustainability Report (BRSR).
- Disclosures aligned with Global Reporting Initiative (GRI) standards.
- Regular sharing of updates on policy implementation, progress, and stakeholder feedback.

9. Governance & Review

Strong governance is the foundation of effective human rights management. At NRL, responsibility lies with the Board and designated committees, ensuring accountability at the highest level. We regularly review this policy to remain aligned with evolving laws, stakeholder expectations, and international best practices.

- The policy will be reviewed once every three years or as required by changes in law, regulations, or stakeholder expectations.
- We are involved in ongoing engagement with stakeholders allows us to enhance our approach based on their feedback.

10. Interpretation

In case of any ambiguity, difference of opinion, or dispute regarding the meaning, scope, or interpretation of the provisions of this Policy, the decision of the Managing Director of the Company shall be final and binding on all concerned.

11. Conclusion

NRL is committed to conducting its business with respect, fairness, and integrity, ensuring that our operations positively impact society. By embedding human rights into our culture, systems, and supply chains, we aim to create a workplace and community environment that is inclusive, ethical, and sustainable for generations to come. This policy shall be used as the guiding light for upholding human rights in all our operations.