GX GROUP™

Responsible Business Conduct Policy



Policy document generated by **GX India Pvt. Ltd.**

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BASIS

This Due Diligence Guidance for Responsible Business Conduct (Guidance) is based on the OECD Guidelines for Multinational Enterprises (OECD Guidelines for MNEs). The OECD Guidelines for MNEs are non-binding recommendations addressed to multinational enterprises by governments on responsible business conduct (RBC). They acknowledge and encourage the positive contributions that businesses can make to economic, environmental, and social progress, and recognize that business activities can result in adverse impacts related to workers, human rights, the environment, bribery, consumers, and corporate governance. The OECD Guidelines for MNEs therefore recommend that businesses carry out risk-based due diligence to avoid and address such adverse impacts associated with their operations, their supply chains, and other business relationships.

PURPOSE

This Guidance helps businesses (enterprises) to understand and implement due diligence for RBC as foreseen in the OECD Guidelines for MNEs (due diligence). This Guidance also seeks to promote a common understanding amongst governments and stakeholders on due diligence for RBC. The OECD Guidelines for MNEs provide enterprises with the flexibility to adapt the characteristics, specific measures, and processes of due diligence to their circumstances. Enterprises should use this Guidance as a framework for developing and strengthening their own tailored due diligence systems and processes, and then seek out additional resources for further in-depth learning as needed. The OECD Guidelines for MNEs have a unique promotion and grievance mechanism – the National Contact Points (NCPs). This Guidance is a useful resource for NCPs in understanding and promoting the OECD Guidelines for MNEs.,

Responsible Business Conduct Thematic area:

I. Human rights:

1.1) Non-Discrimination
   a) Laws for Migrant
1.2) Labor Rights
   a) Working Hours & Overtime
   b) Right to Collective Bargaining
   c) Gender Equality
   d) Supply Chain Responsibility

II. Health and Safety:
   2.1) OHS POLICY

III. Environmental Sustainability
   3.1) Disclosure of Information

IV. Anti-Corruption
V. Stakeholder Engagement
VI. Continuous Improvement
VII. Reporting Mechanisms
7.1) Grievance Mechanism
VIII. Compliance and Monitoring

I. Human Rights:

Objective:

- To uphold and respect human rights in all aspects of our operations and business relationships.
- To promote diversity, non-discrimination, and equal opportunities within our workforce and throughout our supply chain.
- To prevent and address any potential human rights abuses associated with our business activities.

GX India Pvt. Ltd. recognizes the importance of respecting human rights and commits to the following:

1.1) Non-Discrimination:

We are committed to providing a safe environment for all our employees free from discrimination on any ground and from harassment at the workplace. All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Sexual harassment can involve one or more incidents that may be physical, verbal, or non-verbal, and include:

- Commenting on somebody's appearance, sexual orientation, or gender in a derogatory or objectifying way, or in a way that makes them uncomfortable.
- Creating or posting sexually offensive materials in the workplace.
- Flirting at an inappropriate time, for instance in a team meeting, even if these advances would have been welcome in a different setting. These actions can damage a person's professional reputation and expose them to further sexual harassment.
- Flirting with somebody or pursuing them persistently against their will.
- Using obscene comments, gestures, pranks, and jokes that degrade or offend somebody.
- Sending or displaying sexually explicit objects or messages.
- Invading somebody's personal space, for example by touching them inappropriately.

- Threatening, coercing, stalking, or intimidating somebody to pressure them to engage in sexual acts.
- Proposing, demanding, or insinuating sexual favors.
- Sexual assault.

Feel free to reach out to HR in any case of harassment no matter how minor it may seem. If your manager is involved in your claim, anything you disclose will remain confidential.

a) Laws for Migrant

- They include freedom of association, equal pay for equal work, safe working conditions, abolition of forced labour and sex-based discrimination, employment protection, provision of social security, protection of migrant workers, elimination of sexual harassment of women workers and others.

1.2) Labor Rights:

We support the principles of freedom of association and collective bargaining.

Our employees have the right to fair wages, reasonable working hours, and a safe working environment.

a) Working Hours & Overtime:

The regulation of working hours is one of the most long-standing concerns of labor legislation. The very first ILO convention, adopted in 1919 (Hours of Work [Industry] Convention, 1919 [No. 1]), limited hours of work and provided for adequate rest periods for workers.

The ILO Hours of Work (Industry) Convention, 1919 (No. 1) introduced a maximum standard working time of 48 hours per week and eight hours per day as an international norm. In several exceptional cases, workingtime is allowed to exceed these limits, as long as daily working time remains not higher than ten hours, and weekly working time not higher than 56 hours

- Regular working hours (per week, month, and year).
- Overtime working hours (per week, month, and year).
- Rest breaks and days off

ILO Weekly Rest (Commerce and Offices) Convention 1957:
Workday breaks are breaks organized during the working day by pausing the work to rest, eat, or other needs
Weekly rest refers to a minimum break of 24 consecutive hours (1

day) from work within seven days. Daily rest is provided after the end of the working day.

This is the uninterrupted rest period between two shifts within twenty hours.
Annual leave is a yearly vacation or holiday, consisting of consecutive days or weeks off work, which may be paid.

Overtime Working Hours: For an off-role employee who works more than 9 hours in any day, he/she shall, in respect of overtime work, be entitled to receive wages at the rate of twice his/her hourly rate of wages. Also, overtime earned in respect of work on a holiday (vacation), he/she shall be entitled to receive wages at the rate of twice his/her daily wage.

b.) Right to Collective Bargaining

Collective bargaining permits workers to achieve a form of workplace democracy and to ensure the rule of law in the workplace. Workers gain a voice to influence the establishment of rules that control a major aspect of their lives.

Some objectives of collective bargaining include:

- Maintaining cordial relations between management & and the workers
- Settling disputes/conflicts relating to working conditions & and wages
- Protecting the interest of workers through collective action.
- Ensuring the participation of trade unions
- Resolving the differences between workers and management. Principles for both Union & Management:
- Both the parties should have faith in each other.
- Both parties should have positive views of the whole process rather than thinking of it as a formality.
- Both parties should adhere to all laws applicable to collective bargaining

c.) Gender Equality

GX India commits to ensuring that:

- The contributions of both women and men are visible and valued;
- Both women and men are listened to and exercise influence; and
- Women and men have equal access to, and benefit from, information, assets, services, and opportunities.

HR practices: Gender-sensitive and gender-equitable practices integrated into:

- Job recruitment and hiring;
- Performance evaluations; and
- Remuneration-related processes to ensure equal pay for equal work.

Female staff targets: GX India will continue to insist that advancement and hiring through merit are critical to our success. Women's ability to enter and advance at GX will not be because of their gender but because of their talent, insight, and experience.

d.) Supply Chain Responsibility

We extend our commitment to human rights throughout our supply chain and expect our suppliers to adhere to similar principles.

II. Health and Safety

We prioritize the health and safety of our employees, ensuring compliance with occupational health and safety standards.

2.1 OHS POLICY

- GX group is committed to providing and maintenance of a safe place of work for all employees
- Providing adequate resources, equipment, and training for employees at all levels to fulfill their responsibilities about health and safety work practices and activities.
- We have emergency plans and the provision of first-aid training
- We ensure compliance with applicable legislation and regulations.

III. Environmental Sustainability:

Objective:

- To integrate environmental considerations into our decision-making processes and daily operations.
- To comply with relevant environmental laws and regulations and strive for continuous improvement.
- To innovate and adopt sustainable practices that reduce our ecological footprint.

GX India Pvt. Ltd. acknowledges its environmental responsibilities and commits to**:**

- **Sustainable Practices:** We integrate environmental considerations into our decision-making processes, promoting sustainable practices and resource efficiency.
- **Compliance:** We adhere to environmental laws and regulations, striving to reduce our ecological footprint.
- **Innovation:** We seek innovative ways to minimize environmental impact and contribute to broader sustainability goals.

3.1) Disclosure of Information

All business dealings should be transparently performed and accurately reflected in the Participant's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

- Responsible Sourcing of Minerals

  All the our company supply chain vendor have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

IV. Anti-Corruption:

Objective:

- To operate with integrity and a zero-tolerance policy towards corruption, bribery, and extortion.
- To maintain transparent business practices, including accurate financial reporting and disclosure.
- To actively prevent and address any corrupt practices within our organization and supply chain.

GX India Pvt. Ltd. operates with a zero-tolerance policy towards corruption:

- **Bribery and Extortion:** We prohibit any form of bribery, extortion, or corrupt practices in our business dealings.

- **Transparent Business Practices:** We maintain accurate and transparent financial records and disclose information by applicable laws and regulations.

V. Stakeholder Engagement:

Objective:

- To foster open and honest communication with employees, customers, investors, and local communities.
- To actively engage with stakeholders to understand and address their concerns.
- To contribute positively to the development of the communities in which we operate, respecting their cultural and social values.

GX India Pvt. Ltd. recognizes the importance of engaging with stakeholders:

- **Open Communication:** We foster open and honest communication with employees, customers, investors, and the communities in which we operate.

VI). Continuous Improvement:

Objective:

- To regularly review and update our policies to ensure alignment with evolving international standards and best practices.
- To encourage a culture of feedback, continuous learning, and improvement.
- To strive for excellence in responsible business conduct and corporate social responsibility.

GX India Pvt. Ltd. is dedicated to continuous improvement in responsible business conduct:

- **Regular Review:** We regularly review and update our policies, ensuring they align with evolving international standards and best practices.
- **Feedback Mechanisms:** We encourage feedback from employees and stakeholders to enhance our responsible business practices.

VII). Reporting Mechanisms:

We provide accessible and confidential reporting mechanisms for employees and stakeholders to raise concerns related to potential breaches of this policy.

7.1) Grievance Mechanism

A grievance procedure policy of GX India outlines a business's processes and guidelines for filing a formal complaint regarding a workplace, job, or coworker dispute or issue. Businesses implement a grievance procedure policy to help address employee concerns constructively and fairly.

Employees can file grievances when:

- They have been victims of workplace harassment.
- Their health and safety have been compromised.
- Policy guidelines are violated.
- There is a dispute between coworkers, suppliers, and/or management.

GX India also recognizes that every case is different, and this list is subject to change, depending on the definition filed in the Grievance Complaint Form.

VIII). Compliance and Monitoring:

Objective:

- To establish and maintain accessible and confidential reporting mechanisms for employees and stakeholders.
- To conduct regular audits and assessments to monitor and ensure compliance with RBC principles.
- To take prompt corrective action in cases of non-compliance and continuously improve our processes.

GX India Pvt. Ltd. is committed to monitoring and ensuring compliance with this policy:

- **Regular Audits:** We conduct regular audits and assessments to evaluate the effectiveness of our responsible business conduct initiatives.
- **Corrective Action:** In cases of non-compliance, we take prompt corrective action and continuously improve our processes.

This Responsible Business Conduct Policy reflects GX India Pvt. Ltd's commitment to ethical business practices and adherence to the OECD Guidelines for Multinational Enterprises.