Human Rights Policy

Version 1.0

Approval and Effectiveness

This Policy was reviewed and approved by the Board of Directors of Saatvik Green Energy Limited during its meeting held on 11th December 2025. The Policy is effective from the same date and shall remain in force until amended or replaced by the Board/ ESG Council of Saatvik.

1. Prologue

Respect for the human rights is fundamental to the sustainability of any business and communities in which we operate and also, it is a constitutional right provided to all of us by the Government of India. Constitution of India provides its citizens the following 6 rights:

a. Right to equality

b. Right to freedom

c. Right against exploitation

d. Right to freedom of religion

e. Culture and educational rights

f. Right to constitutional remedies

2. Objective

2.1. To establish a formal framework demonstrating Saatvik's commitment to upholding and implementing its Human Rights Policy ("Policy").

2.2. To ensure conformance to fundamental labour principles including the prohibition of child labour, forced labour, freedom of association and right to collective bargaining and protection from discrimination of any nature.

3. Scope & Applicability

This Policy, titled "Human Rights Policy" ("Policy"), is applicable across operations of Saatvik Green Energy Limited and its subsidiaries (collectively referred to as the "Saatvik Group" or "Saatvik").

The Policy applies to all employees (including directors, officers, permanent staff, trainees, probationers, and temporary workers), as well as contractors, suppliers, agents, business partners, and any other third parties representing Saatvik directly or indirectly, to ensure compliance with the highest standards of corporate governance and regulatory requirements.

4. Basic Principles and Governance

Saatvik acknowledges and aligns its practices with the principles outlined in the following international standards:

4.1. United Nations Sustainable Development Goals (SDGs)

4.2. Applicable labour laws

5. Policy, Procedure & Guidelines

5.1. Saatvik recognises the valuable role that business can play in the longer-term for the protection of human rights. Saatvik is committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers).

5.2. Our commitment entails respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing and minimising potential adverse impacts through due diligence and management of issues, and resolving grievances from affected stakeholders effectively and the Saatvik endeavours to achieve our commitment by following:

a. **Legal Compliance and Due Diligence:** Saatvik shall maintain positive legal compliance with applicable constitutional and regulatory human rights requirements and align with its Sustainable Business Framework. Saatvik shall undertake an iterative, due diligence process, the focus of which is identifying, assessing and managing potential human rights risks and impacts;

b. **Policy Alignment:** Saatvik shall align existing policies, processes and activities with commitment to respect human rights, including those that apply to labour practices, engagement with indigenous peoples; land acquisition, supply chain, and security management;

c. **Training and Awareness:** Saatvik shall promote awareness of human rights among employees at various levels of operations through training and communication, engaging with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities;

d. **Employee Health and Safety:** Saatvik shall prioritize the health and safety of its employees, workers, contractors, and all stakeholders across all business operations. Saatvik has established comprehensive health and

safety management systems, which include regular risk assessments, safety training, and the provision of personal protective equipment (PPE) and is dedicated to continuously enhancing its health and safety practices across all areas. All facilities comply with local and international health and safety standards, with ongoing monitoring of workplace hazards to protect well-being;

e. **Freedom of Association and Collective Bargaining:** Saatvik shall respect the right of all workers to form, join, and participate in trade unions and collective bargaining activities of their choice, without fear of intimidation or reprisal, in accordance with national laws. Engagements with worker representatives shall be promoted, documented, and non-retaliation principles shall be strictly upheld;

f. **Safe and Healthy Working Conditions:** Saatvik shall provide safe working conditions for employees, customers, business partners, and visitors, while continuously working to improve safety performance and minimize risks while promoting awareness and strict adherence to applicable health and safety laws.

g. **Human Rights in Supply Chain:** Saatvik shall influence contractors, suppliers and other organizations with whom Saatvik has leverage to adopt Sustainable Business Framework and to encourage and support the development of equivalent management systems and developing goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities;

h. **Continuous Improvement:** Saatvik shall 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 learning, setting and reviewing targets, and monitoring, reporting and disclosing performance.

i. **Fair Working Hours and Wages:** Saatvik shall ensure that employee work schedules comply with applicable local labour laws governing maximum working hours and rest periods. Employees shall be entitled to at least one day of rest within every seven-day period. All overtime work shall be voluntary and compensated, in accordance with legal requirements.

Deductions from wages as a form of disciplinary action shall be strictly prohibited.

6. Restriction and Remedial of Child Labour

Saatvik prohibits and restricts child labour in any of its facilities and is committed to adhering to all applicable laws, rules, and regulations to prevent any legal anomaly to ensure the prodigious of the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986.

Saatvik has a strict policy against the employment of any Child and takes strict action against any person responsible for the engagement of any Child at Saatvik.

"Child/Children" as used in this policy means any person(s) below the age of 14 years.

Saatvik recognises and upholds international best practices on the prohibition of child labour, as set out under the International Labour Organization's Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labour). In India, the principal law governing the employment of children is the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986. Under the Act, no child below the age of 14 years is allowed to be engaged in any occupation or process, and no adolescent below the age of 18 years is allowed to be engaged in any hazardous occupation or process.

Saatvik is fully compliant with both the applicable provisions of Indian law and the relevant International Labour Organization conventions.

6.1. Saatvik's Approach to Prohibition of Child Labour:

a. Saatvik is committed to prohibiting the practice of employing Children. Saatvik hires only those individuals who have completed at least 18 years of age, on confirmation of their ages by way of recognized and valid legal documents like birth certificate, SSLC marks card, school transfer certificate, age certificate issued by the Employees' State Insurance medical officer, driving license, and/or passport.
b. Prior to engagement with Saatvik, it is mandatory for any applicant to submit one or more of the recognized legal documents as set out in clause 5.1. Saatvik undertakes verification of the stated credentials by the applicant against the information provided in the documents. Saatvik does not conduct independent verification to determine the veracity of the document.

c. While Saatvik takes best efforts to prohibit the employment of Children, it relies on the information and documents furnished by the candidate to determine the age of such a candidate. In the event of a candidate falsifying any documents to appear above the age of 18/14 years, Saatvik shall proceed to terminate the services of such candidate and may take any action as available to it under law.
d. If any person employed or engaged with Saatvik is found to be soliciting or facilitating employment of any Child, Saatvik shall take strict disciplinary action against such person, which may include termination of the services of such person and reporting to appropriate law enforcement authorities.
e. Saatvik also requires that its suppliers, agents, and contractors commit not to engage or employ Children. Prior to entering into a relationship with Saatvik, all suppliers, agents, and contractors are required to execute an undertaking that they do not engage any Children in respect of their services provided to or on behalf of Saatvik.
f. Each employee of Saatvik has a duty to comply with the provisions of this Policy. If any employee of Saatvik has any knowledge of the employment of any Child in Saatvik or any advertisement of solicitation of Children, he/ she shall immediately report this to his/her Human Resource Head.
g. Notwithstanding any other provision of this policy, nothing in this policy shall be applicable to the engagement of any Child by Saatvik, if such engagement is an internship, and is done after school hours or during vacations, and is with the consent of his/her parents.

6.2. Compliance with Laws:

a. If any person above the age of 15 years, but below the age of 18 years, is employed at Saatvik as permitted by applicable law, Saatvik shall undertake all measures as prescribed under applicable law in respect of employment of such persons, including in respect of their working hours, overtime hours, weekly holidays, and their health and safety.
b. Saatvik shall maintain a register in respect of all such individuals as stipulated in clause 6.2.a, employed by Saatvik, which sets out all the requirements as stipulated by applicable law.

7. Diversity, Equity & Inclusion (DEI) & Anti-Discrimination

Saatvik recognizes diversity, equity, and inclusion as essential to fairness, innovation, and business success. We are committed to maintaining a workplace where every individual is respected, valued, and given equal opportunity to thrive. We have a zero-tolerance stance toward discrimination or harassment and are committed to an inclusive culture that enables all employees to reach their potential.

This section seeks to ensure that all individuals covered under Saatvik's policies, practices, and processes are treated fairly and equitably and are not subjected to less favorable treatment on the grounds of age, race, religion, creed, color, national origin or ancestry, physical or mental disability, marital status, gender, gender identity or expression, sexual orientation, caste, or any other characteristic protected under applicable law.

7.1. Saatvik's Commitments:

a. Providing a workplace free from discrimination and harassment for all employees. This applies to all employee-related processes and decisions, including but not limited to:
    i. Recruitment, selection, and career progression
    ii. Terms and conditions of employment and compensation
    iii. Working environment and health, safety and welfare measures
    iv. Training and professional development
    v. Redundancy and re-deployment
b. Employing best practices in regard to diversity, equity, and inclusion (DEI) initiatives, benchmarked with globally reputed companies and institutes, and embedding DEI considerations into all HR and business decisions. Saatvik shall provide an environment of equality, dignity, and mutual respect for all employees and contractors.
c. Harassment in any form, verbal, physical, psychological, or sexual, is strictly prohibited, and awareness sessions shall be held annually to prevent such incidents
d. Not discriminating against any individuals based on their gender, age, disability, ethnicity, sexual orientation, family status, marital status, religious beliefs, caste, socio-economic background, nationality, or any other protected characteristic. Saatvik shall operate in accordance with all applicable legislation in the jurisdictions where it operates.
e. Ensuring fairness and avoiding unlawful discrimination in matters including recruitment and selection, remuneration, employment terms and conditions,

promotions, professional development, and performance evaluations. Saatvik shall conduct periodic reviews of these processes to identify and correct potential bias and shall promptly and fairly address complaints of harassment, bullying, or discrimination raised by employees, customers, suppliers, or other stakeholders.

f. Providing reasonable workplace accommodation for employees with disabilities.
g. Reviewing the Group's employment policies and practices to promote fairness and address gender bias and underlying barriers to achieving gender balance, and to enhance the representation of underrepresented groups, including persons with disabilities.
h. Building leadership capability by providing equal opportunities for training and development of staff, as required, to harness their full potential, and providing equal opportunities for all employees in respect of career progression.
i. Ensuring equal pay for equal work by periodically reviewing compensation structures to identify and eliminate unjustified pay gaps.
j. Encouraging suppliers and contractors to uphold equivalent non-discrimination and inclusion standards within their operations and workforce.

7.2. Policies and Practices:

A range of policies, processes and practices are in place to promote equity, inclusion, and dignity at work. These include:

a. **Dignity at work:** Saatvik's policies are designed to be inclusive of all employees, irrespective of gender identity, gender expression, or sexual orientation. Examples include dress code policy, adoption leave policy, paternity leave policy and Maternity Leave Policy. We recognize the domestic partner of an employee, irrespective of their gender, for applicable policies and processes, e.g., the Mediclaim program.
b. **Work-life balance policies:** These include a range of flexible working initiatives, parental leave, and childcare. While every effort will be made to accommodate requests for flexible/alternative working arrangements, consideration must be given to business priorities.
c. **Prevention of workplace harassment:** Saatvik strictly prohibits any form of workplace harassment, whether physical, psychological, verbal, sexual, or digital. Managers are responsible for ensuring a professional environment where all employees feel respected and safe. Awareness sessions on prevention of

sexual harassment, workplace civility, and respectful communication shall be conducted annually.

d. **Training and awareness:** Saatvik shall organize mandatory annual training and sensitization programs for all employees, including managers and contractual staff, covering topics such as diversity, inclusion, unconscious bias, prevention of discrimination, and harassment. Specialized training modules shall also be conducted for recruitment, HR, and supervisory personnel to prevent bias in hiring and promotion processes. Saatvik aims to ensure 100% coverage of employees by FY 2027.
e. **Supplier inclusion:** Saatvik expects its suppliers, contractors, and business partners to uphold equivalent DEI and anti-discrimination principles.

7.3. Roles & Responsibilities:

a. Saatvik's Management and Leadership shall lead and support the Company in creating an inclusive and diverse workplace. They are responsible for ensuring that effective policies and processes are in place to achieve Saatvik's equity and diversity objectives. Management shall provide guidance, resources, and direction for implementing this Policy and advise colleagues on addressing equity-related matters in the workplace.
b. Managers and Functional Heads are responsible for ensuring that all policies and processes relating to recruitment, selection, career development, discipline, and grievance are applied in accordance with statutory requirements and organizational commitments to promote equity and eliminate discrimination. They shall also ensure that employees are encouraged and supported to reach their full potential.
c. Employees are responsible for upholding and implementing the objectives of this policy and contributing to a safe and inclusive environment that celebrates diversity.
d. Employees shall refrain from engaging in any conversation, behaviour, or activity that reflects explicit or implicit bias toward any individual or group. Any violation of this Policy may result in disciplinary action in accordance with company procedures.

7.4. Board Diversity:

a. Saatvik recognizes that diversity within its Board of Directors is integral to effective governance and sustainable decision-making. A diverse Board brings

together a balance of skills, perspectives, and experiences that enhance the quality of oversight and strategic guidance.

b. Saatvik seeks to maintain an appropriate mix of competencies across functional, industry, and leadership domains, while also promoting diversity in gender, age, background, and professional expertise. The Board Nomination and Remuneration Committee shall periodically review the composition of the Board to ensure that it continues to reflect a broad range of perspectives aligned with Saatvik's strategic direction and values of inclusivity.

c. Appointments to the Board shall be made through a formal and transparent process, considering merit, integrity, and the contribution that each candidate can make to Saatvik's governance effectiveness and diversity objectives. The Committee shall also review this Policy periodically and recommend updates to ensure continued alignment with applicable governance requirements and leading practices.

7.5. Measurement and Impact:

a. Saatvik's diversity, equity, and inclusion initiatives shall be measured on an annual basis. Each year, the Board of Directors shall establish specific objectives for gender diversity and other priority areas of inclusion identified by the Board.
b. Saatvik's current diversity objectives include:
    i. Establishing group-level Diversity Councils with defined charters and agendas;
    ii. Achieving agreed-upon diversity hiring targets for both campus and lateral recruitment; and
    iii. Monitoring year-on-year progress in overall workforce diversity across all levels and functions
c. The following gender diversity indicators have been set for Saatvik and progress shall be reviewed and reported annually:
    i. Percentage of women in senior management
    ii. Percentage of women recruited during the year
    iii. Percentage of total full-time female employees across Saatvik
d. The Human Resources Department shall compile and review these metrics annually, report the outcomes to the Board and the Group Diversity Council, and recommend corrective measures or new initiatives where necessary to support continual improvement.

8. Reporting and Grievance Mechanism

8.1. Reporting of Violations:

Employees, workers, contractors, suppliers, agents, business partners and third-party workers are encouraged to report any suspected instances of bonded labour through Saatvik's Whistleblower Policy and Vigil Mechanism, available on Saatvik's official website.

Reports can be made anonymously. Saatvik has a strict zero-tolerance policy for retaliation and guarantees protection from retaliation for individuals who report concerns in good faith

8.2. Reporting of Harassment and DEI Incidents:

Saatvik provides a confidential and accessible mechanism for reporting incidents of discrimination, harassment, or inequitable treatment. Employees, contractors, or suppliers may report concerns through Saatvik's Whistleblower Policy and Vigil Mechanism, available on Saatvik's official website, or directly to the HR Department. All reports shall be acknowledged within 7 working days and investigated within 30 working days.

8.3. Investigation and Remediation:

Any reported violation of this Policy will be thoroughly investigated by Saatvik. If a human rights violation is discovered, immediate corrective action will be taken to address the situation and provide support to the affected employee.

This may include the provision of financial support, legal assistance, and alternative employment opportunities for the affected individuals.

9. Our Commitments

9.1. Achieve a 20% reduction in Lost Time Injury Frequency Rate (LTIFR) by 2027 compared to the baseline year 2025

9.2. Maintain 100% adherence to health and safety regulations at all facilities on an ongoing basis

9.3. Ensure that all employees have access to clear and transparent two-way communication channels for raising workplace concerns and sharing suggestions by FY 2025

9.4. Conduct annual evaluations of employee pay and benefits to uphold fairness, equity, and competitiveness in compensation structures

9.5. Encourage and safeguard employees' freedom of association and collective bargaining rights in line with applicable labour laws

9.6. Conduct human rights impact assessments on critical operations by FY 2028

9.7. Carry out annual risk-based audits for 50% suppliers by FY 2027, to ensure adherence to Saatvik's Human Rights and Supplier Code of Conduct

9.8. Conduct periodic audits covering at least 50% of high-risk suppliers by 2030 to ensure they are free from child labour practices, with a plan to expand coverage in subsequent years gradually

9.9. Ensure zero tolerance for child labour across Saatvik's own operations and extend compliance requirements to all direct suppliers by 2030

10. Responsibility

The Human Resources department is responsible for developing the human rights policy and proposing annual objectives to the Board of Directors. It must also identify best practices and tools that Saatvik can use to help achieve its commitments and targets.

11. Review and Amendments:

This Policy shall be reviewed annually, or in the event of significant regulatory or operational changes, to ensure its continued alignment with best practices, stakeholder expectations, and legal requirements. Saatvik remains committed to continually improving the human rights practices. Any amendments to this Policy shall be made in writing and will become effective upon approval by the ESG Council of Saatvik.

Disclaimer:
This Policy supersedes all previous policies or practices in Saatvik. The Human Resources Department of Saatvik is the final authority in interpreting and deploying the clauses, rules, and procedures mentioned in the Policy. Saatvik reserves the right to modify the Policy from time to time.