

SANGHI INDUSTRIES LIMITED

Policy on Freedom of Association

The Sanghi Industries Limited's (SIL) - "Freedom of Association Policy" is in alignment with the Adani Group's "Freedom of Association" Policy

Group Policy on "Freedom of Association"

- 1.0 Context:** Freedom of Association is a part of Human Rights. It, however, has some unique features that warrant having a separate policy for this Freedom.
- 2.0 Description:** Freedom of Association can be described as the right of individuals to come together with other individuals in order to collectively express, promote, pursue and / or defend common interests. Freedom of Association applies both to individuals and a collection of individuals as a defined Group. It encompasses the right of individuals to join or leave any group or association voluntarily. It allows the group to take collective action to pursue the common interests of its members. It allows groups to accept or decline membership based on defined criteria.
- 3.0 Duties & Restrictions:** The Freedom of Association comes along with the duties of individuals and groups to ensure that their objectives are not subversive, criminal and are aligned to the business interests of the Company. The organisation may impose specific restrictions on some of the objectives or actions of any individual or Group under this Policy if it has reason to believe that such actions are contravening good governance or are illegal as per the laws of the land.
- 4.0 Policy:**
- 4.1** SIL respects the rights of all individuals employed or associated with the Adani Group through business interests, to the freedom of association and the rights of collective bargaining without interference and discrimination.
 - 4.2** The authorised representatives of the SIL / Group will co-operate in good faith with any bodies that its employees or associates choose to represent them including unions, work councils and similar bodies.
 - 4.3** SIL will allow employees to freely elect or choose its representatives for dialog with the Management.
 - 4.4** SIL will provide, to the extent feasible, facilities that allow representatives of employee bodies to carry out their work within the boundaries of defined organisational work processes.
 - 4.5** The organisation will define, detail and provide forums that allow employees or their representatives to discuss with the management regarding work processes, working conditions and issues related to employee health and safety.
 - 4.6** The organisation will create a Grievance mechanism that will allow employees to raise issues covered under 4.5 above, anonymously.
 - 4.7** The rights and freedoms enshrined in this policy will be reviewed from time to time by Group HR and compliance will be periodically reported to the Board of Director of each entity and the Group.