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Policy Owner	Human Resources	Policy Approver	ESG Committee

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## 1. Forward

At Advanta, our business strategy is driven by a vision to build a fairer, more socially inclusive world. We must strive for a better tomorrow and as such, are fully committed to respecting human rights across our global business operations.

We believe that business can only flourish in societies where human rights are respected and protected. We acknowledge our responsibility to respect international guidelines on human rights, affirming the equality and dignity of all people. We also understand that, in principle, every aspect of our operations and business relationships can influence human rights, both positively and negatively.

Our commitment to respect human rights are guided by United Nations Guiding Principles on Business and Human Rights (UNGP's), OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises and International Labour Organization's Declaration.

This Human Rights Policy Statement reflects our core commitment to respecting human rights. We take deliberate steps to integrate this commitment and its guiding principles into the policies and processes across our business. This policy applies to the entire Advanta Group and provides human rights specific guidelines for all our activities worldwide.

## 2. Our Commitment

Advanta Enterprises Limited, along with its group companies worldwide (collectively referred to as "Advanta" or "Advanta Group") is committed to the principles set out in the United Nations Guiding Principles on Business and Human Rights<sup>1</sup>. This commitment encompasses internationally recognized human rights as outlined by the International Bill on Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), OECD Guidelines for Multinational Enterprises<sup>2</sup> and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work<sup>3</sup>.

We recognize the diversity of local laws in the locations where we operate, and where our products are used. Our principle is that where any local laws and international guidelines on human rights differ, we will adhere with local laws while seeking ways to respect international guidelines on human rights to the maximum extent possible.

## 3. Purpose

The objective of this policy is to clearly communicate our responsibilities, expectations and commitments regarding human rights to all our employees/ workers and stakeholders across the entire organization. It serves as a guide for all Advanta employees/ workers to foster a corporate culture that supports and recognizes human rights. It provides guidelines for situations that may pose a risk to human rights due to our extensive operations across various geographies and collaborations with multiple third-party partners. We are committed to identifying, preventing and mitigating adverse human rights issues that may arise from our business activities. This policy

<sup>1</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)

<sup>2</sup> <https://mneguidelines.oecd.org/mneguidelines/>

<sup>3</sup> <https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>

outlines the procedures and actions Advanta will undertake in response to complaints or breaches to mitigate violation of human rights principles and standards.

#### **4. Scope**

This policy is applicable to all employees/ workers of Advanta across the globe. This includes full-time and part-time employees/ workers, interns, trainees, contractual staff, and temporary employees/ workers. This policy needs to be communicated to everyone in an appropriate and meaningful manner.

#### **5. Our Approach**

We strive to respect, protect and uphold human rights across our global business operations including:

- Our own employees/ workers
- Our suppliers' employees/ workers (direct and indirect suppliers/ contractors)
- Our customers and third-party business associates
- Other potentially impacted stakeholders

We have identified the following priority risk areas that are relevant across our global business operations based on internationally recognized human rights guidelines:

##### **5.1 Child Labour**

Advanta Group has zero tolerance to child labour, in accordance with the United Nations Convention on the Rights of the Child, International Labour Organization (ILO) Conventions No. 138 (Minimum Age Convention) and No. 182 (Worst Forms of Child Labour Convention). In alignment with these principles, Advanta Group has developed a specific Child Labour Policy that explicitly prohibits any form of child labour practices within our premises, offices, factories, warehouses and entire supply chain.

Advanta must not engage in or support the use of any sort of child labour in their business operations. They must comply with the minimum employment age limit defined by the International Labour Organization's (ILO) conventions or the applicable local laws, whichever is higher. Advanta shall implement an age verification mechanism within its recruitment process to verify the age of all employees/ workers to ensure compliance.

We have incorporated non-negotiable clauses in all our contracts with the suppliers to prohibit the use of child labour. Further, we conduct regular inspections, including surprise visits on our suppliers and business partners. Any supplier/ business partner found to be using child labour will be blacklisted by Advanta Group.

In instances where young employees/ workers (aged 15 to 18) are employed, they must not be assigned tasks that are mentally, physically, socially, or morally hazardous, nor should their work interfere with their education. However, if applicable local laws prohibit the employment of employees/ workers under the age of 18, we will comply with such regulations and refrain from employing young employees/ workers accordingly.

We are committed to compliance with the applicable local laws and international guidelines on labour and human rights, continually striving to ensure that the conduct of all employees/ workers aligns with these requirements.

## **5.2 Forced Labour**

Advanta Group strictly prohibit the use of any form of modern slavery, including servitude, forced or compulsory labour, bonded labour and any form of human trafficking. As part of our commitment to the International Labour Organization (ILO) Conventions No. 29 (Forced Labour Convention) and No. 105 (Abolition of Forced Labour Convention), we are committed to identifying and addressing any instances of modern slavery within our operations and throughout our supply chains.

Advanta must respect the freedom of movement of their employees/ workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent employees/ workers from terminating their employment, provided they comply with requirements for advance notices as specified by the applicable local laws.

## **5.3 Freedom of Association**

We respect our employees/ workers' right to freely join, form or refrain from joining a labour union without fear of reprisal, intimidation or harassment. We also acknowledge that employees/ workers may be interested in joining welfare associations or involving themselves in civil or public affairs in their personal capacities and we fully support their freedom to do so. These labour union or welfare associations may engage in collective bargaining according to the applicable local laws and international guidelines. We commit to the principles set forth in the ILO Conventions No. 87 (Freedom of Association and Protection of the Right to Organize Convention) and No. 98 (Right to Organize and Collective Bargaining Convention).

At Advanta, employees/ workers have the right to elect their own representatives in accordance with the applicable local laws and international guidelines. We are committed to maintaining constructive and open dialogue with our employees/ workers and their representatives, as well as engaging with trade unions where applicable. Employees/ workers serving as representatives will not be disadvantaged or favored in any way, ensuring fairness and impartiality in line with our commitment to respecting labour rights.

## **5.4 Working Time, Wages & Benefits**

We provide competitive compensation to our employees/ workers, aligned with the legal minimum wage provided in the applicable local laws and industry wage agreed within collective bargaining agreements, whichever is higher. We support and respect our employees/ workers' right to rest and leisure by promoting a work-life balance, including offering applicable leave. We are also committed to the principle of equal remuneration for equal work as outlined in the ILO Convention No. 100 (Equal Remuneration Convention).

Advanta must pay compensation to employees/ workers regularly, in a timely manner and in full. We are committed to full compliance with the applicable local laws and international guidelines in relation to wages, work hours, overtime and benefits.

## 5.5 Discrimination and Harassment

Fair and equitable treatment is a fundamental principle at Advanta. We are fully committed to providing equal opportunity to all and do not tolerate any form of discrimination and harassment.

We are fully committed to fair and respectful treatment in our operations, supply chain and committed to the ILO Convention No. 111 (Discrimination Convention). All employees/ workers are mandated to contribute to creating a workplace free from discrimination or harassment based on age, gender, color, disability, ethnic origin, family status, gender expression, gender identity, nationality, physical characteristics, pregnancy, religion, sexual orientation, social origin, union membership, political belief or any other criterion as defined by the applicable local laws. Any form of harassment, abuse, or bullying—whether sexual or otherwise—that is deemed threatening, humiliating, offensive, or intimidating is addressed with stringent measures.

We have robust and effective policies in place, including our Policy on Sexual Harassment at the Workplace and the Whistleblower Policy, which protect against all forms of discrimination and provide a secure platform for employees/ workers to raise concerns. At Advanta, hiring, recruitment, development, compensation, and promotions are strictly based on qualifications, performance, skills, and experience, ensuring a fair and merit-based workplace.

## 5.6 Inclusion and Diversity

We are committed to fostering, cultivating and maintaining a culture of inclusion and diversity, where every individual can bring their authentic selves to work. We promote inclusion and diversity in our business operations across the globe by encouraging a diverse range of skills and experiences which drives innovation and product development.

We are committed to provide to equal opportunity across all aspects of employment for Persons with Disabilities and Transgender Persons, including recruitment, promotions, transfers, training, compensation, and employee benefits in accordance with applicable local laws and international guidelines. This will create a more inclusive and supportive environment for all stakeholders, ensuring that our human rights commitments are upheld across our global business operations.

## 5.7 Health and Safety

We are strongly committed to the safety and well-being of all our employees/ workers, customers, business partners, and visitors. This includes access to safe drinking water, adequate lighting, temperature control, ventilation and sanitation at the workplace. A healthy and secure workplace is our top priority, and we strictly adhere to all applicable local laws and international guidelines on workplace health and safety. In alignment with these principles, Advanta Group has established a dedicated HSE Policy overseen by the HSE committee. We provide hygienic, humane, and conducive working conditions for all employees/ workers and staff members, as well as for those residing in the vicinity of our project sites. We encourage our employees/ workers to foster a safe and healthy working environment and promptly report any unsafe or hazardous conditions. We explicitly refrain our employees/ workers from

possessing, consuming or distributing prohibited drugs or controlled substances at the workplace.

Further, Advanta is committed to maintaining an atmosphere free from violence, aggression, intimidation and other dangerous or disorderly conditions. We emphasize the importance of implementing a strong and effective security system across our premises, including factories and formulation sites, to protect employees/ workers from all forms of internal and external threats.

Advanta is committed to identifying and assessing relevant risks and emergency situations in the workplace, surrounding community, and employee accommodations. We will minimize potential impacts by implementing robust fire protection measures, effective emergency plans, regular drills, and response procedures. Continuous training will be provided to ensure that all employees and workers are adequately always protected.

## 5.8 Environment

We acknowledge our responsibility to respect the environment and are aware of the potential impacts of our products, production processes, and procurement activities on the environment, as well as their associated effects on human health and well-being.

We are committed to full compliance with all applicable local laws and international guidelines on environmental sustainability. We encourage our employees/ workers and suppliers to comply with company-wide programs and adhere to these laws and guidelines.

## 5.9 Community Engagement

At Advanta, we ensure that the human rights of the communities we engage with are upheld and protected in all our business operations. We recognize the importance of proactive engagement with all stakeholders, including local communities and vulnerable groups. We are committed to fostering open and continuous dialogue to understand and address their concerns and needs. We strive to create positive impacts through local engagement and investment in education, health, social needs and community projects to uplift and provide adequate support to these local communities and indigenous groups.

We encourage our employees/ workers to volunteer for initiatives that benefit local communities, while maintaining our commitment to fairness and refraining from any promotional activities based on religion or caste.

## 5.10 Data Privacy

At Advanta, we recognize privacy as a fundamental human right, particularly in today's hyperconnected digital landscape. As data privacy regulations continue to evolve globally, we remain committed to upholding accountability and transparency in safeguarding personal information. We adhere to the General Data Protection Regulation (GDPR), ensuring the protection and responsible handling of personal data. For further information on how Advanta manages personal data and ensures compliance with global privacy regulations, please refer to our Advanta Privacy Policy<sup>4</sup>.

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<sup>4</sup> Source: <https://www.advantaseeds.com/privacy-policy>

## **6. Our Compliance Program**

In order to prevent human rights violations and mitigate potential risks at Advanta, we place significant emphasis on a robust compliance program, which includes the following key components:

### **6.1 Legal Compliance**

Advanta Group adheres to all applicable local laws and international guidelines concerning human rights across the regions where we operate. We proactively assess our global business operations to identify any location or areas which may pose a risk of human rights violations. This involves periodically monitoring our operations and business practices to ensure compliance with human rights principles at all levels. When any potential risks are identified, we implement proactive and effective mitigation measures to address and prevent any adverse impacts.

Our approach to legal compliance is supported by our unwavering commitment to responsible, honest and ethical behavior, which is embedded in our Global Code of Conduct. Advanta Group not only seeks to meet the legal requirements but also strives to adopt industry best practices in human rights compliance, ensuring that respect for human rights is maintained throughout our global operations.

### **6.2 Training and Awareness Sessions**

Advanta Group is committed to fostering a deep awareness of human rights across all levels of the organization. We regularly conduct training and awareness sessions for all our stakeholders, including employees/ workers, suppliers and business partners.

Our human rights policies are communicated through a variety of channels, such as campaigns, workshops, training programs, e-learning modules, seminars, and newsletters, ensuring widespread understanding and adherence to our human rights commitments.

### **6.3 Human Rights Due Diligence**

We acknowledge that human rights risks and issues are inherent in global business operations, including our own. To manage these risks, we have integrated human rights due diligence into our policies and internal controls. We conduct human rights due diligence by assessing supplier adherence to our Human Rights Policy and Supplier Code of Conduct through regular dialogue, supplier self-assessments, independent third-party audits, employees/ workers surveys and other forms of assurance. Any non-adherence identified are promptly addressed through corrective action plan.

### **6.4 Grievance Redressal**

At Advanta, we are committed to conducting business in an ethical and lawful manner, recognizing our responsibility to provide remedies in accordance with the applicable local laws and international guidelines. We strongly encourage all stakeholders including employees/

workers to raise any concerns directly with us and ensure that all these stakeholders have access to grievance mechanisms.

This Human Rights Policy is aligned with our Global Code of Conduct, which establishes a grievance mechanism for all stakeholders to address and resolve issues or potential violations. We assure that no action or reprisal will be taken against any stakeholder for raising concerns in good faith under this policy. The Company is committed to investigating, addressing, and responding to stakeholder concerns, taking appropriate corrective action in response to any identified violations. Wherever we identify human rights impacts linked to our business relationships, we will collaborate with our suppliers and partners to address and prevent these issues in accordance with international guidelines.

We strongly encourage all employees/ workers and relevant stakeholders to report any violations of this Policy at a Deloitte managed reporting channel called Tip-Offs Anonymous. Complaints can be made:

- by email at [UPL@tip-offs.com](mailto:UPL@tip-offs.com).
- through a customized website [www.tip-offs.com/UPL](http://www.tip-offs.com/UPL) (in English); or
- by hotline numbers for specific regions.

Please refer to Advanta's Global Code of Conduct<sup>5</sup> for further details on Tip-Offs Anonymous. Our grievance cell is accessible to all stakeholders, ensuring that issues and concerns are addressed with sensitivity and urgency. Employees/ workers can also raise their concerns regarding potential human rights infringements with their manager or supervisor.

We strongly encourage all employees/ workers to adhere strictly to the principles outlined in this policy and to take proactive measures to prevent any violation or suspected violation of this policy. Any individual found in violation of this policy will face strict action from the organization.

We seek the wholehearted support of every entity/ business partner associated with Advanta Group to uphold its commitment towards the human rights of all individuals who work with us and those affected by our business operations.

## 7. Roles and Responsibilities

Our human rights governance is led from the top, overseen by the Global Code of Conduct Committee. This committee is responsible for the implementation and continuous improvement of Advanta's commitments to human rights outlined in this policy. We have established the Regional-Human Rights Committees that provide progress reports on human rights-related activities and present updates at least once a year, as well as on an ad hoc basis when necessary. To ensure our Human Rights Policy remains relevant and effective, we commit to conducting annual reviews and updates. These reviews will incorporate feedback from stakeholders and reflect evolving best practices and emerging human rights issues. Global Code of Conduct Committee will oversee this process, ensuring that our policy continuously aligns with international guidelines and our organizational goals.

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<sup>5</sup> Refer Page 42, Section 7 "Reporting Complaints" of Global Code of Conduct accessible at [Code of Conduct.pdf](#)



## 8. Going Forward

We continually assess and enhance our approach to addressing human rights. We believe that collaboration through external initiatives and partnerships is the most effective way to tackle shared challenges.

Human rights considerations are integrated into Advanta Group's overall business strategy. We align our human rights goals with our corporate social responsibility (CSR) initiatives and sustainability targets.

Cross-functional teams are established to oversee the implementation of the human rights policy, ensuring that it is embedded across all departments and functions. This strategic alignment ensures that our commitment to human rights is reflected in every aspect of our business operations. Leveraging the strength of our purposeful brands to create a positive social impact is a core part of the Advanta Group, which is fundamentally anchored in respect for human rights.