



**S.P.APPARELS LTD.**

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WEB : www.s-p-apparels.com  
CIN No. : L18101TZ2005PLC012295

## Human Rights Policy Document

We, the SP APPARELS LTD recognise our responsibility to operate with respect to human rights. Everybody deserves to be treated equally, and with respect and dignity. For us at SP APPARELS LTD, respecting human rights is also about leading with our values

“Treat the people the way you want to be treated”.



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### Document Control Section

Document Name	Human Rights Policy
Abstract	SP Apparels Ltd 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 effectively.

### Authorization

Document Author	Document Owner	Reviewed By	Approved By
1. Suganya.R.S – Legal Dept. 2. Nagaraj A.S - Compliance 3. Shivakumar.R – Corporate HR	Corporate HR	P.V. JEEVA CEO	CMD

### Review & Amendment log

Version	Modification Date	Section	Amendment / Modification / Deletion	Brief Description of Change / Review
1	24.04.2023	NA	NA	NA



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## 1. PURPOSE

It is the purpose of this Policy to define SP Apparels Ltd's commitment to respect Human Rights as defined by the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration of Fundamental Principles and Rights at Work. We also commit to the United Nations Guiding Principles on Business and Human Rights.

## 2. SCOPE AND APPLICABILITY

This policy applies to all individuals working at all levels and grades, including Directors and all the employees (whether Apprentices/trainees, Probationary, permanent and fixed-term), Honorary, consultants, contractors, casual workers and agency staff, volunteers, , agents, sponsors, business partners, stakeholders and third-party representatives anywhere in the world, or any other person associated with us, wherever located who may be acting on behalf of SP APPARELS LTD. It is therefore, the responsibility of everyone to follow and adhere to all elements described in the Policy. In countries where there are more stringent applicable laws, regulations or industry codes, SP APPARELS LTD requires compliance with the most restrictive requirement and the principles set out in this Policy shall stand superseded in those specific countries.

## 3. OUR COMMITMENT

### A. Respect for Human Rights

We emphasize treating individuals with dignity and respect inside our Company and any other person associated with us, such as Board of Directors, government officials, local communities, parties, vendors, buyers, suppliers, customers, customer, candidates attending interview. We commit to continuously review and update



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policies and procedures to proactively identify, address and respond to unfavorable Human Rights impacts with which we are possibly included. We are dedicated to complying with pertinent laws and implement controls wherever we operate. Where national law and international Human Rights standards differ, we follow the higher standard.

#### B. Valuing Diversity

We value the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, gender, colour, national or social origin, religion, age, disability, sexual orientation, gender identity, HIV status, marital status, or any other status protected by the laws or regulations in the locations where we operate.

Regardless of personal characteristics or status, SP APPARELS LTD does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to SP APPARELS LTD employees, but also throughout our supply chain and all stake holders, shareholders & vendors.



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#### C. Freedom of Association and Collective Bargaining

We respect our employees' right to associate or not associate with third-party organizations, join, form or not join a labour union, seek representation, bargain or not bargain collectively in accordance with local laws, without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representative.

#### 4. OUR STANDARDS AND EXPECTATIONS

Respect for Human Rights is fundamental to the success of SP APPARELS, our subsidiaries and the communities where we operate. Employees are united by values that demonstrate our insistence on achieving the right results, the right way:

1. Have the Courage to Lead
2. Communicate Openly and Transparently
3. Commit To and Support Each Other
4. Promote and Protect Quality Outcomes
5. Honour Our Past While We Proudly Pursue Our Future

##### 4.1 Do's and Don'ts

###### Do's

1. The Employee shall approach the members of the GRIC functioning in the company to raise the issue and lodge the complaints with regard to Human Rights Violation occurred in & outside the premises.



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2. Investigation shall be conducted by the GRIC members to find out the genuineness of the complaint and action shall be taken against the person involved in the violation.

**Don'ts**

1. Act or Actions of an employee such as humiliating, starring, shouting, harassment against local communities, parties, vendors, suppliers, customers, agents, government officials, bankers, truck drivers, stake holders and etc... in the company are fully restricted.
2. An employee who indulged or lodging complaints in respect of Human Rights Violations shall not be threatened & abused by another employee(s) are strictly restricted.
3. Allegations over an employee without proper records to substantiate the same shall not be entertained.

**5. RAISING A CONCERN AND PROTECTION**

All SP Apparels Ltd employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Chief Compliance Officer. Concerns should be reported by following the procedure set out in "Anti-Bribery and Anti-Corruption policy".



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An employee who refuses to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. SP Apparels Ltd aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

SP Apparels Ltd Entities will ensure that no one will suffer any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any employee believes that he or she has suffered any such treatment, he or she should inform the Chief Compliance Officer immediately. If the matter is not remedied then Associate should raise it formally to the Chief Compliance Officer and or Human Resource Head.

## 6. LEADING WITH TRANSPARENCY

SP Apparels Ltd's ambition is to lead the way to a more sustainable and responsible future for our industry. We want to drive progress for people, and we believe that impactful and meaningful growth is how we continue to stay relevant to our customers and Associates and secure our long-term business success.

By being transparent with our ambitions and learnings we hope to inspire action and open up for teamwork. We still have a lot to learn, but we know we have the experience, curiosity and determination to make a difference.



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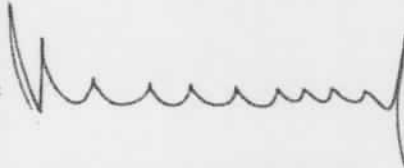
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## 7. COMPLAINTS HANDLING MECHANISM

We regularly review and update the progress on our efforts, and publicly communicate the results. If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it to their Chief Compliance Officer or GRIC Committee established and functioning in the company where we conduct an appropriate investigation. Concerns can be reported through SP Apparels Compliance Helpline anonymously, if desired. It shall be maintained confidentially by the committee. The employee committed Human Rights Violation shall be given MEMO by the concerned Authority.

**Note: English version shall be prevailing in case of discrepancy between the English and Tamil Version of this Policy.**

P. SUNDARARAJAN  
MANAGING DIRECTOR

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