



Lee Pharma Limited

LEE PHARMA LIMITED

Reg Office: SY. No. : 257 & 258/1, Door No : 11-6/56-C, Opp : IDPL Factory, Moosapet, Balanagar (Post), Hyderabad – 500 037, India

TITLE: Policy on Human Rights

Policy No: LPHRGNP-015-00

Effective Date: 01-04-2025

Page 1 of 4

Review Date: 31-03-2027

1. Objective

Lee Pharma is committed to respecting and upholding the fundamental human rights of all individuals impacted by our operations, including employees, contract workers, suppliers' workers, customers, and communities in which we operate. We recognize our responsibility to avoid causing or contributing to adverse human rights impacts through our own activities and to address such impacts if they occur.

2. Scope

This policy applies to:

- All directors, officers, and employees of Lee Pharma.
- All contractors, subcontractors, temporary workers, and agency personnel working on our premises or on our behalf.
- Our suppliers, vendors, and business partners throughout our supply chain ("Supply Chain Partners").

3. Guiding Principles

Our Human Rights Policy is founded on:

- The UN Guiding Principles on Business and Human Rights (UNGPs): Protect, Respect, Remedy Framework.
- International Labor Organization (ILO) Core Conventions: Including freedom of association, elimination of forced/child labor, and non-discrimination.
- Universal Declaration of Human Rights (UDHR) & International Bill of Human Rights.

4. Specific Human Rights Commitments

We commit to respecting the following rights

4.1 Fair Labor Practices

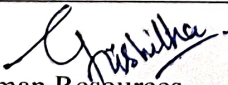
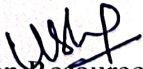
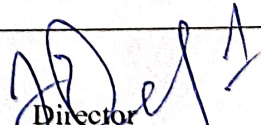
- **Fair Wages:** Payment of at least statutory minimum wage or prevailing industry wage (whichever is higher), providing clear written information on pay, and ensuring timely payment. Overtime will be voluntary, compensated at legally mandated rates, and within legal limits.
- **Working Hours:** Adherence to legally mandated limits on working hours, overtime, and provision of adequate rest periods and leave entitlements.
- **Employment Relationships:** Commitment to providing clear terms of employment, avoiding excessive use of temporary or contract labor for core functions, and ensuring non-permanent workers receive their legal entitlements.

4.2 Freedom of Association & Collective Bargaining

Respecting the right of all employees to form, join, or refrain from joining trade unions or other worker representative bodies of their choice, and to bargain collectively, free from harassment, intimidation, or retaliation, in accordance with applicable laws.

4.3 Safe & Healthy Working Conditions

- Providing a safe, hygienic, and healthy work environment, compliant with all applicable health and safety laws (especially critical in EMS manufacturing with chemicals, machinery, soldering, etc.).

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 Human Resources	 Human Resources	 Director



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Page 2 of 4

- Implementing robust Occupational Health & Safety (OHS) management systems, including risk assessments, safe work procedures, emergency preparedness, and regular training.
- Ensuring access to clean water, sanitation, and adequate rest facilities.

4.4 Prohibition of Child Labor

No employment of individuals below the minimum age for employment (18 years in India) or below the age for completing compulsory education, whichever is higher. Strict adherence to laws regarding adolescent workers.

4.5 Prohibition of Forced, Bonded or Compulsory Labor & Human Trafficking

- No use of forced, prison, indentured, bonded, or trafficked labor.
- Prohibition of debt bondage.
- Workers retain control over their identity documents.
- Workers are free to terminate employment after reasonable notice.

4.6 Non-Discrimination & Equal Opportunity

- Providing equal opportunities in recruitment, hiring, training, promotion, compensation, and termination based on merit and ability, without discrimination based on race, caste, creed, religion, ethnicity, national origin, gender, gender identity, sexual orientation, age, disability, marital status, pregnancy, union membership, political affiliation, or any other status protected by law.
- Fostering a respectful and inclusive workplace culture free from harassment, bullying, and victimization. Strict implementation of the POSH Act.

4.7 Dignity & Respect

Treating all individuals with dignity and respect, fostering a workplace free from any form of harassment, abuse, or corporal punishment.

4.8 Privacy

Respecting employee privacy concerning personal information, consistent with applicable laws and regulations.

4.9 Fair Grievance Mechanisms




Providing safe, accessible, confidential, and effective channels for employees and stakeholders to raise concerns or grievances regarding human rights impacts without fear of retaliation.

4.10 Working Conditions for Vulnerable Groups

Paying specific attention to the rights and needs of vulnerable groups such as women, migrant workers, contract labor and persons with disabilities to ensure they are protected from exploitation and discrimination.

4.11 Community Rights

Respecting the rights of communities surrounding our operations, including meaningful consultation

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Page 3 of 4

where operations may impact land, livelihoods, water, or cultural heritage. Contributing positively to community development where possible.

4.12 Security Practices

Ensuring any security personnel employed or contracted by the Company are trained on human rights principles and use force only when strictly necessary and proportionate, in accordance with the law.

5. Supply Chain Responsibility

- We expect our Supply Chain Partners to adhere to the principles outlined in this policy or equivalent standards.
- We will integrate human rights due diligence into our supplier selection, onboarding, and ongoing management processes.
- We will communicate this policy to all key suppliers and work collaboratively with them to build capacity and address identified risks.
- We reserve the right to audit suppliers (or require third-party audits) for compliance and to take appropriate action, including termination of contracts, in cases of severe or persistent non-remediation of human rights violations.

6. Human Rights Due Diligence (HRDD)

We commit to implementing a robust ongoing Human Rights Due Diligence process, as per the UNGPs, to:

- Identify and Assess: Potential and actual human rights impacts associated with our operations and business relationships.
- Integrate & Act: Take appropriate steps to prevent, mitigate, and address adverse impacts based on our assessment.
- Track: Monitor the effectiveness of our actions.
- Communicate: Report transparently on how we address human rights impacts.




This includes regular risk assessments, impact assessments for new projects or major changes, and ongoing monitoring.

7. Grievance Mechanisms & Remediation

We provide multiple confidential and accessible channels for employees and stakeholders to report concerns or grievances related to human rights violations, including:

Direct managers/supervisors.

- Human Resources Department.
- POSH Committee (for sexual harassment).
- Designated Ethics Hotline / Whistleblower Mechanism (ensuring anonymity where permitted by law and protection against retaliation).
- Worker Representatives / Committees.

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