



Embio Ltd.

LABOR AND HUMAN RIGHTS POLICY

DOC-EL-POL-03

REV. NO. 01

Effective Date: 01/01/2024

Next Review Date: 31/12/2027

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Introduction

Embio Ltd. is committed to upholding the highest standards of labor rights and human rights within its operations. This policy outlines our commitments to fostering a safe, inclusive, and equitable work environment that respects and protects the rights of all employees. At Embio, we believe that technology is the backbone of our success and allows us to achieve a leadership position in all the products we manufacture. With over 30 years of experience in Bacterial, Fungal & Category 1 GMO bio transformation, we are focused on creating fully backward integrated GMO biotransformation platforms. Our pipeline of disruptive technologies provides a first-movers' advantage, establishing a leadership position in the global market.

Scope

This policy applies to all workers, employees, contractors, and business partners working within Embio Ltd. It extends to all aspects of employment, including recruitment, working conditions, remuneration, training, career development, and employee well-being. This policy applies to following locations:

Embio Ltd. (Corporate)	501, Sentinel, 5th Floor, Central Avenue Road Hiranandani Gardens, Powai 400076 Mumbai, Maharashtra India
Site Address	E-21, E-22/1/2/3, E-23-1/2/3/MIDC Industrial Estate, Mahad - 402 309, Dist. Raigad, Maharashtra, India

Policy Statement

Embio Ltd. adheres to international human rights principles, including the Universal Declaration of Human Rights and the International Labour Organization (ILO) conventions. We ensure fair treatment of all employees and commit to continuous improvement in our labor and human rights practices.

Key Focus Areas and Commitments

1. Health and Safety at Work

Embio Ltd. will enhance workplace safety by decreasing lost-time injury rates by 30 % and increasing safety compliance audit scores by 20 % by 2030, compared to the 2022 baseline year. This will be achieved through advanced risk assessment programs, enhanced personal protective equipment (PPE) standards, and mandatory safety drills.

2. Working Conditions

Embio Ltd. will improve employee well-being by ensuring at least 90% of employees report a positive work-life balance and reducing reported work-related stress incidents by 25% by 2030, compared to the 2022 baseline year. This will be supported by flexible working arrangements, mental health initiatives, and structured workload assessments.

3. Social Dialogue and Collective Bargaining

Embio Ltd. will strengthen employee engagement by ensuring at least 75 % of the workforce has access to collective bargaining agreements and increasing participation in structured feedback mechanisms by 30 % by 2030, based on the 2022 baseline year. This will be driven by open forums, leadership engagement sessions, and enhanced representation of employee bodies.

4. Career Management and Professional Development

Embio Ltd. will elevate workforce skills by ensuring 100% of employees completes a minimum of 30 hours of professional training per year and increasing internal promotions by 15 % by 2030, using the 2022 baseline year. This will be facilitated through mentorship programs, leadership training modules, and career pathway initiatives.

5. Prohibition of Child, Forced, or Compulsory Labor

Embio Ltd. will eradicate unethical labor practices by ensuring 100% of suppliers undergo annual labor rights audits and increasing whistle-blower report resolutions by 30 % by 2030, relative to the 2022 baseline year. This will be accomplished through supplier code enforcement, grievance redressal mechanisms, and supply chain transparency measures.

6. Prevention of Discrimination and Harassment

Embio Ltd. will foster inclusivity by ensuring at least 15% of managerial roles are held by underrepresented groups and maintaining 0% workplace discrimination cases by 2030, from the 2022 baseline year. This will be achieved through targeted diversity hiring, sensitivity training, and zero-tolerance policy enforcement. Embio Ltd. will promote inclusivity by providing annual inclusion and non-discrimination training to 100% employees and conducting workplace risk assessments each year to identify and address discrimination-related issues.

7. Human Rights Due Diligence

Embio Ltd. will embed human rights in all operations by ensuring 100% of suppliers comply with human rights due diligence assessments and increasing stakeholder engagement on human rights topics by 30 % by 2030, compared to the 2022 baseline year. This will be driven by third-party audits, ethical sourcing policies, and collaborative initiatives with human rights organizations.

8. Fair Compensation and Living Wages

Embio Ltd. will ensure fair pay practices by achieving 100% compliance with living wage standards across all direct employees and increasing salary transparency initiatives by 40 by 2030, compared to the 2022 baseline year. This will be supported by periodic wage assessments, fair pay policies, and open salary structures.

9. Employee Well-being and Mental Health

Embio Ltd. will enhance mental health support by ensuring 100% of employees access to workplace mental health training programs and reducing reported cases of work-related anxiety by 20 % by 2030, relative to the 2022 baseline year. This will be achieved through training programs, conducting stress risk assessments, and proactive mental health campaigns.

10. Ethical Supply Chain Management

Embio Ltd. will ensure responsible sourcing by achieving 100% supplier compliance with ethical labor and environmental standards and reducing supply chain-related human rights violations by 25 % by 2030, using the 2022 baseline year. This will be driven by supplier audits, ethical sourcing policies, and capacity-building programs for supply chain partners.

SDGs Covered



Responsibility

Chief Manager HR & Admin (CMHA): Oversees the overall implementation and compliance of this policy.

Chief Manager HR & Admin (CMHA): Ensure workplace rights, safety standards, and training programs are effectively implemented.

Department Heads and Team Leaders: Enforce adherence to labor rights and support employee well-being initiatives.

All Employees: Expected to uphold the principles of this policy and report any violations or concerns through appropriate channels.

Governance Mechanism

Embio Ltd. ensures the effective implementation of its Labor and Human Rights Policy through structured oversight, compliance, and continuous improvement.

- **Oversight:** The Board of Directors provides strategic guidance, while the Labor and Human Rights Committee (LHRC) oversees execution and progress.
- **Implementation:** HR manages fair employment practices, Compliance monitors legal adherence, and Procurement ensures supplier compliance.
- **Monitoring:** Annual audits, grievance mechanisms, and stakeholder consultations drive transparency.
- **Improvement:** The policy is reviewed annually, incorporating audit findings and industry best practices.

This framework upholds accountability, ethical standards, and human rights across all operations.

Measures for Policy Violation

Embio Ltd. enforces strict actions for violations of its labor and human rights policy:

- Investigation: Reported violations are assessed within 30 days by the Ethics and Compliance Team.
- Corrective actions: Employees face warnings, suspension, or termination; suppliers must comply or risk contract termination.
- Disciplinary measures: Minor infractions lead to retraining or suspension; major violations (e.g., forced labor, harassment) result in termination, permanent disqualification, or legal action.
- Remediation: Affected employees receive support, and regular audits prevent recurrence.

This ensures accountability and ethical labor practices.

Do's

- Maintain a safe and healthy workplace, reducing incidents and stress-related risks.
- Ensure fair wages, reasonable working hours, and work-life balance.
- Encourage open social dialogue and respect collective bargaining rights.
- Provide equal opportunities, training, and career development for all employees.
- Conduct regular audits to prevent child labor, forced labor, and human rights violations.
- Promote diversity, inclusion, and a workplace free from discrimination and harassment.
- Hold suppliers accountable for ethical labor practices and compliance.

Don'ts

- Engage in or tolerate child labor, forced labor, or unethical working conditions.
- Ignore workplace hazards, safety violations, or employee well-being.
- Discriminate, harass, or retaliate against employees based on gender, race, or other factors.
- Prevent employees from participating in collective bargaining or social dialogue.
- Overlook supplier non-compliance with labor and human rights standards. Dismiss or delay employee grievances related to unfair treatment or rights violations.

This ensures a responsible, fair, and ethical work environment at Embio Ltd.

Review mechanism

This policy will be reviewed every three years by the Chief Human Resources Officer and Compliance Officer to assess its effectiveness and alignment with evolving labor and human rights standards.


Rev No.	Effective Date	Next Review Date	Section Updated	Description of Changes	Reviewed By	Approved By
0	01/01/2024	01/01/2025	Initial Release	First version of the Labor and Human Rights Policy	Chief Manager – HR/Admin	Vice President- HR / Administration
1.0	01/01/2025	31/12/2027	Governance Mechanism	Added governance structure and policy enforcement measures	Chief Manager – HR/Admin	Vice President- HR / Administration

Last Review Date: 01/01/2025

Next Review Date: 31/12/2027

Approved By: Mr. M. S. Tamhankar

Designation: Vice President- HR & Corporate Affaires

Signature: 



Acknowledgement

I, K. C. Choudhary, acknowledge that I have read, understood, and agree to adhere to Embio Ltd.'s Labour and Human Rights Policy. I recognize the importance of my role in supporting the company's commitment to fair labor practices and human rights and am committed to actively contributing to the implementation of this policy. I will uphold ethical labor standards, ensure compliance with all relevant labor laws and company policies, and promote a safe, inclusive, and respectful workplace.

I understand that my commitment is essential to achieving the company's labor and human rights objectives and fostering a culture of fairness, dignity, and respect. I am dedicated to contributing to our shared vision of ethical employment practices and the protection of human rights across all operations.

Employee Name: K. C. Choudhary

Employee Signature: [Signature]

Date: 04/01/25