



Clean Max Enviro Energy Solutions Limited
HUMAN RIGHTS POLICY

November 2024

CMES-HR-HRP-001

Description	The policy is to provide rules and guidelines to be adopted and followed by CleanMax Enviro Energy Solutions Limited and its subsidiaries and joint ventures ("CMES" "we", "us", "our" or "the Organization"), its employees, and any third-party contractors appointed by CMES (to the extent as set out in this document) to ensure the respect and protection of human rights in all operations.
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CleanMax Human Rights Policy	Current Version No.: 1.0
Name & prepared by	Designation
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VERSION CONTROL HISTORY

Version	Date	Author	Reviewed By	Approved By	Summary of Change
1	4-Nov-2024	Rebecca Fernandes	Sweta Sajani	CMES Board Directors	NA

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1. INTRODUCTION

At CleanMax, we are committed to operating with the highest ethical standards. Respecting human rights is fundamental to our business and integrated throughout our decision making, governance and operations. Our commitment to respecting human rights is consistent with our ESG Principles, which include having policies and procedures in place, aimed at ensuring the well-being and safety of employees, mitigating the impact of our operations on the environment, upholding strong governance practices and being good corporate citizens in the communities in which we operate.

This Human Rights Policy (the “**Policy**”) applies to all officers, employees, and temporary workers, collectively “personnel” of Clean Max Enviro Energy Solutions Ltd and all their controlled subsidiaries, and the Board of Directors (collectively, “CleanMax”, “we”, “us”, “our”).

2. OUR COMMITMENT TO RESPECT HUMAN RIGHTS

The purpose of this Policy is to set out our approach to respecting fundamental human rights, which we define by reference to the United Nations Universal Declaration of Human Rights, International Bill of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. We seek to identify and prevent adverse human rights impacts within our businesses and supply chains and to act in a way that aligns with international human rights standards, including:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- OECD Due Diligence guidance for Responsible Business Conduct
- Voluntary Principles on Security and Human Rights

We seek to treat our employees, customers, suppliers, and the communities in which we operate with dignity and in a manner that respects human rights. This includes a commitment to the elimination of forced or compulsory labour; the abolition of child labour; the right to a safe and healthy workplace free of discrimination and harassment, where people are treated irrespective of race, sex, nationality, ethnicity, language, religion, sexual orientation, gender identity and expression, employment and occupation or any other status. We are committed to equal pay for all employees, regardless of gender, ensuring fair compensation based on skills, experience, and job performance to foster an inclusive workplace; recognizing the rights to freedom of association and collective bargaining; and the provision of wages that meet or exceed those required by law.

We seek to include consideration of and engagement with the communities in which we operate, including Indigenous Peoples, women and other vulnerable groups; respect the lawful and safe exercise of freedoms of expression, of association

The above and our human rights program are driven by the salient human rights areas in our business which include but are not limited to occupational health and safety, labour rights, forced labour, and security practices. We review and confirm these areas through regular human rights assessments.

¹ For purposes of the Policy, “temporary workers” include non-full-time employees.

² A controlled subsidiary of CleanMax may have in place or adopt its own human rights policy that is consistent with the provisions of this Policy. Where risk is assessed to be low, portfolio companies may determine that there is no need to establish specific human rights policies and procedures. Where a subsidiary has adopted its own human rights policy (or similar policy) that is consistent with the provisions of this Policy, such policy will govern.

3. OUR APPROACH

We seek to identify, prevent and mitigate adverse human rights impacts in our business activities and supply chain through the implementation of this Policy and the support of the following programs:

- **Code of Business Conduct and Ethics:** Our Code of Business Conduct and Ethics (“Code of Conduct”) reinforces and supports our commitment to respect human rights. Our Code of Conduct describes our commitment to conducting business in an ethical and responsible manner including respecting human rights.
- **Counterparty Expectations:** We communicate our expectations to counterparties and conduct appropriate due diligence. Our Vendor Code of Conduct (“Vendor Code”) sets our expectations that our vendors respect human rights and maintain processes to identify and prevent adverse human rights impacts that could arise from their own or their supply chain’s operations. We monitor compliance with, and maintain the right to, periodically audit vendors against the Vendor Code and provide an ethics reporting hotline for anonymous reporting of any concerns or potential violations.
- **Supply Chain Due Diligence:** Our Supply Chain Due Diligence Guidelines support the integration of human rights considerations into our procurement processes. Due diligence is carried out on material contracts and includes assessing human rights risks both with our direct suppliers as well as within the broader supply chain.
- **Due Diligence for New Investments:** Our processes support us in identifying and preventing potential human rights risks and impacts throughout the lifecycle of our investments including at the earliest stages. Our ESG Due Diligence Protocol and accompanying Human Rights Due Diligence Guidelines help us identify, avoid, prevent, and mitigate potential human rights risks and impacts within potential investments.
- **Community and Stakeholder Engagement:** We seek to proactively engage with stakeholders including local communities and Indigenous Peoples where we operate and strive to create shared value. Through our engagement and local assessments, we seek to identify, avoid, prevent, and mitigate potential human rights risks and impacts.
- **Assessing Human Rights Risks and Impacts:** We conduct human rights assessments on a regular basis covering our operations and supply chain and including stakeholder input. The outcomes of these assessments inform updates to our program and policies

We provide regular training on our Code of Conduct and wider training and communications to relevant employee groups in line with their roles and responsibilities.

4. GRIEVANCES AND ACCESS TO REMEDY

We provide appropriate channels for our workforce, local communities, partners and other stakeholders to support reporting and recording of grievances raised, including any that are related to human rights. We seek to make available and communicate details of our channels to all stakeholders and partners either through a website or in direct communication with communities in the areas of influence.

We maintain our confidential and anonymous ethics hotline that has been stated in Appendix A. The hotline is hosted by an independent third party and is available to our employees, vendors, partners, communities, and other interested parties. It can be accessed via our website and is available in multiple languages.

All grievances reported through these channels are carefully reviewed and, where appropriate, responded to. In the event that we identify that we have caused or contributed to an adverse human rights impact, we will take appropriate action to mitigate or remedy the impact. When doing so we will consider all the relevant circumstances of the case including, but not limited to (i) the extent to which CleanMax has directly caused or contributed to the impact, (ii) CleanMax' S ability to influence the mitigation or remedy of the impact, and (iii) any wider consequences which may flow from CleanMax' s action.

We seek to promote remediation and will not impede lawful access to judicial process nor retaliate against those who have exercised their rights to raise grievances.

5. INTEGRATION WITH OTHER POLICIES AND PROCEDURES

Our human rights expectations are integrated within CleanMax' s policies and procedures, including but not limited to:

- Code of Business Conduct and Ethics
- Vendor Code of Conduct
- Anti-Bribery and Anti-Corruption Policy
- Whistleblowing Policy
- ESG Policy
- Health, Safety, Security and Environment Policy

³ Additional training includes Anti-Bribery Anti-Corruption (ABC), Health, Safety, Security and Environmental (HSSE) training and Supply Chain Due Diligence training.

6. GOVERNANCE OF THE POLICY

The responsibility for the management of human rights issues extends across Clean Max Enviro Energy Solutions Ltd. CleanMax' s human rights matters are overseen by CleanMax' s Managing Director who is supported by senior representatives from across the business.

Board-level oversight is provided by the Nominating and Governance Committee of the Board of Directors of CleanMax, which has ultimate oversight of our ESG program.

This Policy was reviewed and approved by the Board of Directors of Clean Max Enviro Energy Solutions Ltd.

Appendix A

ETHICS REPORTING LINE:

*For Indian locations, the helpline contact info is as follows –

Phone Line (toll-free) : 1800-202-8303

Web reporting portal : <https://cleanmax.integritymatters.in>

Email: cleanmax@integritymatters.in

*For locations outside India, the helpline contact info is as follows -

The Phone line is accessed in two stages:

1. Dialing the country-specific access code:
 - For Thailand - 1-800-0001-33
 - For Dubai - 8000-555-66
 - For Bahrain - 800-00-001
 - For any other locations outside India, refer: [Access code list](#)
2. Entering the toll-free hotline phone number, 800-603-2869, once prompted

Web reporting portal : <https://report.syntrio.com/cleanmax>

Email: reports@syntrio.com (please include company name 'CleanMax' in the email)

Vendor	Coverage	Language	Support availability
Syntrio	All offices outside India	English, Thai, Arabic	24/7
Integrity Matters	India	English, Hindi	24/7
		Indian Regional Languages	Mon - Fri (10 am to 7 pm) Other timings: Voicemail