

HUMAN RIGHTS POLICY

Formulated in alignment with the UN Guiding Principles on Business and Human Rights, ILO Core Conventions, and SEBI BRSR Principle 5 (NGRBC)

1. Our Commitment

ShinzoX Group Limited recognises that business enterprises have a responsibility to respect human rights — as articulated in the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. This Human Rights Policy ("Policy") sets out our commitment to upholding human rights across our own operations and value chain spanning healthcare, banking and financial services, information technology and digital services, global trade, spirits, logistics, and industrial equipment.

This Policy is also aligned with Principle 5 of the National Guidelines on Responsible Business Conduct (NGRBC) — "Businesses should respect and promote human rights" — as required for disclosure under the SEBI Business Responsibility and Sustainability Report (BRSR) framework.

2. Scope

This Policy applies to:

- All employees, directors, and workers at all levels across ShinzoX Group Limited and its subsidiaries
- All business operations and facilities in India and internationally
- Business partners, suppliers, contractors, and other entities in the Company's value chain, to the extent of the Company's leverage

3. Human Rights Standards

The Company is committed to respecting the following human rights:

3.1 Labour Rights

- Freedom from forced, bonded, or compulsory labour in any form
- Abolition of child labour — the Company does not employ or engage anyone below the legal working age, and actively opposes child labour in its supply chain
- Freedom of association and the effective recognition of the right to collective bargaining
- Elimination of discrimination in employment and occupation on grounds of gender, caste, religion, disability, age, sexual orientation, or any other protected characteristic
- Fair wages and decent working conditions including lawful working hours, rest periods, and safe workplaces

3.2 Right to Safety and Healthy Conditions

Every worker has the right to safe and healthy working conditions. The Company's Health, Safety and Environment Policy operationalises this commitment across all facilities.

3.3 Right to Privacy

The Company respects the right to privacy of employees, customers, patients (healthcare), and all individuals whose data it processes. The Company's Data Privacy and DPDP Policy operationalises this commitment.

3.4 Rights of Women

The Company is committed to gender equality and the empowerment of women. This includes equal pay for equal work, non-discrimination, prevention of sexual harassment (operationalised through the POSH Policy), and equitable access to development opportunities.

3.5 Rights of Vulnerable Groups

The Company gives particular attention to the rights of vulnerable groups in its operations and supply chain, including persons with disabilities, migrant workers, indigenous and tribal communities near project areas, and workers in informal employment.

3.6 Community Rights

The Company respects the rights of communities, including indigenous communities, to be consulted on activities that may affect their land, livelihood, or way of life. We are committed to free, prior, and informed engagement with communities wherever material impact is possible.

4. Due Diligence

The Company shall conduct ongoing human rights due diligence to:

- Identify actual and potential adverse human rights impacts connected with its operations and value chain

- Prevent and mitigate adverse impacts, with priority given to the most severe

- Track the effectiveness of responses and communicate how impacts are addressed

Human rights due diligence shall be integrated into the Company's risk management framework and reviewed annually. New business ventures, mergers, and entry into high-risk geographies shall include a human rights risk assessment.

5. Supply Chain

The Company expects its suppliers and business partners to share its commitment to human rights. This expectation is embedded in:

- The Business Partner Code of Conduct, which all business partners are required to sign

- Supplier onboarding due diligence

- Periodic supplier audits for high-risk categories (garments, agriculture, chemicals, construction)

6. Grievance Mechanisms

The Company provides accessible, confidential grievance mechanisms for workers and community members to raise human rights concerns:

- Employees: Vigil Mechanism, POSH ICC, HR grievance channels

- Workers/Contractors: HSE reporting, Vigil Mechanism

- Community members: Contact us at community@shinox.com or write to the CSR Committee at Ward No.7 Preet Nagar Chopan District, Sonbhadra - 231205, Uttar Pradesh, India

The Company shall not retaliate against any person who raises a concern in good faith through these channels. Grievances shall be acknowledged within seven days and addressed within 45 days.

7. Remediation

Where the Company identifies that it has caused or contributed to an adverse human rights impact, it shall take appropriate steps to provide or cooperate in legitimate remediation for affected individuals. Remediation may include apology, restitution, rehabilitation, financial or non-financial compensation, or other appropriate measures.

8. Disclosure

The Company shall disclose its human rights performance, material risks, and actions taken in the Annual Report through the Business Responsibility and Sustainability Report (BRSR) as required under SEBI LODR. This Policy shall be published on the Company's website at www.shinzoX.com.

9. Governance

The Board of Directors of ShinzoX Group Limited is ultimately responsible for overseeing the implementation of this Policy. Day-to-day responsibility rests with the Managing Director and functional heads of HR, Legal, CSR, and HSE. The Policy shall be reviewed annually by the Board.

10. Training

The Company shall provide training on human rights responsibilities to relevant employees and managers, with particular focus on those in procurement, HR, legal, community relations, and healthcare functions. Training shall be provided at onboarding and refreshed at least every two years.

Approved by the Board of Directors of ShinzoX Group Limited | Virendra Pratap Singh, Chairman & Managing Director