



SHOVON KNITWEAR LTD.

Manufacturer & Exporter of Quality Knitwear.

(A concern of Shovon Group of Companies Limited)

LABOUR AND HUMAN RIGHTS POLICY



Document No.: SKL-LHRP-POL-004

Version: 01

Effective Date: 01 June 2026

Review Frequency: Annually

Next Review: 01 June 2027

Approved By: Managing Director

Responsible Department: Sustainability Department



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Introduction

At Shovon Knitwear Ltd., we are committed to respecting and protecting the fundamental rights, freedoms, dignity, and well-being of every individual working within or associated with our operations and supply chain.

Our labor and human rights practices are guided by applicable national laws and internationally recognized frameworks, including relevant International Labour Organization (ILO) Conventions, the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the Universal Declaration of Human Rights (UDHR).

This Labor and Human Rights Policy formalize our commitment to maintaining a safe, fair, inclusive, and respectful workplace; preventing human-rights abuses; promoting decent working conditions; and ensuring that workers can raise concerns without fear of retaliation.

We are committed to continuously improving our labor and human rights performance through appropriate policies, risk assessment, worker engagement, training, monitoring, corrective actions, and management review.

Scope

This policy applies to all employees, workers, managers, temporary and contract workers, apprentices, subcontractors, suppliers, and other relevant business partners associated with Shovon Knitwear Ltd., as applicable.

The policy covers the company's own operations and relevant supply-chain relationships, with particular attention to labor and human-rights risks associated with procurement, employment, production, and business activities.

Sl/No	Name Of Site	Address
1	Shovon Knitwear Ltd. – Narayanganj	West Masdair, Fatullah, Narayanganj, Bangladesh.



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Policy Statement

Shovon Knitwear Ltd. is committed to providing a safe, fair, inclusive, and respectful workplace that protects employees' rights, dignity, and well-being. We prohibit child labor, forced labor, discrimination, harassment, and other forms of exploitation while promoting equal opportunities, diversity, fair wages, reasonable working hours, freedom of association, and decent working conditions. We respect internationally recognized human rights and comply with applicable labor laws and regulations. Through regular risk assessments, employee engagement, training, grievance mechanisms, and corrective actions, we strive for continuous improvement in our labor and human rights performance across our operations and relevant supply chain.

Qualitative Commitments

1. Employee Health, Safety, and Well-being

- Maintain a safe, healthy, and hygienic working environment by identifying workplace hazards, assessing risks, and implementing appropriate preventive and control measures.
- Provide suitable personal protective equipment (PPE), safety instructions, and emergency response systems to protect employees from occupational hazards.
- Promote employee physical and mental well-being through health awareness, stress management, and appropriate support programs.
- Provide regular occupational health and safety training, emergency preparedness exercises, and awareness programs to strengthen a positive safety culture.
- Encourage employees to report hazards, accidents, near misses, and safety concerns without fear of retaliation.
- Investigate workplace incidents, implement corrective and preventive actions, and continuously improve occupational health, safety, and employee well-being performance.
- Comply with applicable occupational health and safety laws, regulations, and relevant international labor standards.

2. Inclusive and Respectful Workplace Culture

- Prohibit all forms of discrimination, harassment, bullying, intimidation, and unequal treatment in employment and workplace interactions.
- Promote diversity, equity, inclusion, and equal opportunities in recruitment, training, career development, promotion, and compensation.



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- Ensure all employees are treated with dignity, fairness, and respect, regardless of gender, age, disability, religion, ethnicity, or other legally protected characteristics.
- Maintain accessible, confidential, and anonymous grievance-reporting channels to enable employees to raise concerns without fear of retaliation.
- Investigate complaints fairly and promptly, maintaining confidentiality and protecting individuals who report concerns in good faith.
- Foster an inclusive workplace culture through employee awareness, management commitment, and regular engagement.
- Comply with applicable labor laws and internationally recognized human rights principles to support a fair and respectful working environment.

3. Fair and Ethical Working Conditions

- Ensure all employees receive fair wages, legally required benefits, and paid leave in accordance with applicable labor laws and employment agreements.
- Maintain transparent employment terms, including written contracts, clear wage structures, working hours, overtime arrangements, and leave entitlements.
- Promote work-life balance through reasonable scheduling, adequate rest periods, and flexible working arrangements where operationally feasible.
- Prevent excessive overtime, involuntary work, wage deductions without lawful justification, and all forms of exploitative employment practices.
- Ensure overtime is voluntary where required by applicable law, properly recorded, and compensated in accordance with legal requirements.
- Respect employees' right to rest and personal time, including the right to disconnect outside working hours, subject to applicable laws and legitimate operational requirements.
- Regularly review working conditions, payroll practices, and employee feedback to identify risks and drive continuous improvement.
- Prohibit retaliation against employees who raise concerns about wages, working hours, benefits, or other employment conditions.

4. Prevention of Child and Forced Labor

- Prohibit child labor, forced labor, bonded labor, prison labor, human trafficking, and all other forms of involuntary labor across our operations and relevant supply chain.
- Verify the age and legal eligibility to work of all employees during recruitment through reliable and legally compliant documentation.
- Never retain employees' original identity documents, restrict freedom of movement, or require recruitment fees or deposits that could contribute to forced labor.
- Ensure employment is entered into freely and without coercion, with employees receiving clear information about their employment terms and conditions.
- Establish appropriate procedures for the remediation and protection of any worker



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identified as being at risk of child or forced labor, with the child's best interests considered in cases involving child labor.

- Communicate applicable child and forced labor requirements to suppliers and business partners and require them to maintain equivalent labor and human-rights standards.
- Assess relevant suppliers through document reviews, risk assessments, audits, or other appropriate due-diligence mechanisms.
- Investigate suspected cases promptly and implement appropriate corrective, preventive, and remediation measures. Protect employees and stakeholders who report child or forced labor concerns from retaliation or adverse treatment.

5. Freedom of Association and Collective Dialogue

- Respect employees' rights to freely form, join, or not join trade unions, worker committees, or other representative organizations in accordance with applicable laws.
- Prohibit discrimination, harassment, intimidation, or retaliation against employees or representatives exercising their legitimate rights to freedom of association and collective dialogue.
- Maintain open, constructive, and good-faith dialogue with elected employee representatives and worker organizations.
- Provide appropriate opportunities for employee representatives to communicate workers' concerns and participate in workplace consultations.
- Seek to resolve workplace disputes and conflicts through fair negotiation, dialogue, mediation, and other appropriate grievance-resolution mechanisms.
- Respect applicable collective bargaining rights and honor legally binding collective agreements where applicable.
- Promote a workplace culture where employees can raise concerns and participate in workplace decision-making without fear of retaliation.

6. Respect for External Stakeholders and Human Rights

- Respect the human rights, dignity, livelihoods, and well-being of local communities and other external stakeholders potentially affected by our operations.
- Identify and assess potential human rights impacts and risks associated with our operations, projects, contractors, and relevant business relationships.
- Engage openly and respectfully with affected communities and relevant stakeholders to understand concerns and incorporate appropriate feedback into decision-making.
- Maintain accessible and appropriate grievance and feedback mechanisms for external stakeholders to raise human-rights or community-related concerns without fear of retaliation.
- Investigate reported concerns promptly, communicate outcomes transparently where appropriate, and implement corrective, preventive, and remediation measures when



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adverse impacts are identified.

- Integrate relevant human rights, labor, ethical, and social criteria into contractor and supplier selection, evaluation, and monitoring processes.
- Require contractors and relevant business partners to comply with applicable laws and the company's human rights expectations.
- Promote responsible business conduct, transparency, and continuous improvement throughout our operations and relevant business relationships7. Career Development and Learning

7. Career Development and Learning

- Promote equal access to training, professional development, career advancement, and skills development for employees at all levels.
- Identify employee training and development needs through appropriate performance reviews, skills assessments, job requirements, and employee feedback.
- Provide relevant technical, occupational health and safety, compliance, sustainability, and professional development training.
- Support employees in developing the knowledge, skills, and competencies required for their current and future roles.
- Promote fair and transparent opportunities for internal mobility, promotion, succession planning, and career progression, based on objective and job-related criteria.
- Provide managers and supervisors with appropriate training to support effective people management, respectful workplace practices, and employee development.
- Maintain appropriate records of training participation, development activities, and competency improvement to support continuous improvement.

8. Prevention of Discrimination and Harassment

- Maintain a workplace free from discrimination, harassment, bullying, intimidation, abuse, and unequal treatment, including discrimination based on gender, race, ethnicity, religion, age, disability, sexual orientation, or other legally protected status.
- Maintain zero tolerance for sexual harassment, physical or verbal abuse, bullying, threats, and other forms of workplace misconduct.
- Ensure recruitment, compensation, training, promotion, disciplinary action, and termination decisions are based on objective, job-related criteria and applicable legal requirements.
- Provide regular training and awareness programs for employees, supervisors, and managers on respectful workplace behavior, non-discrimination, prevention of harassment, and reporting procedures.



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- Maintain confidential and accessible grievance channels through which employees can report discrimination, harassment, or abuse without fear of retaliation.
- Investigate reported cases promptly, impartially, and confidentially, and take appropriate corrective or disciplinary action where misconduct is substantiated.
- Protect complainants, witnesses, and employees who raise concerns in good faith from retaliation or adverse treatment.
- Promote a workplace culture based on dignity, respect, inclusion, equal opportunity, and fair treatment for all employees.

9. Prevention of Human Trafficking and Modern Slavery

- Prohibit human trafficking, modern slavery, forced labor, debt bondage, servitude, and all other forms of involuntary labor throughout our operations and relevant business relationships.
- Ensure that employment is freely chosen, without coercion, threats, deception, or restriction of workers' freedom of movement.
- Prohibit the charging of recruitment fees or related costs to workers where prohibited by law or company requirements.
- Prohibit the retention or confiscation of workers' original identity documents, passports, work permits, or other personal documents.
- Conduct appropriate human-rights and modern-slavery due diligence for relevant suppliers, contractors, recruitment agencies, and other higher-risk business partners.
- Require relevant suppliers and contractors to comply with the company's requirements concerning forced labor, human trafficking, and modern slavery.
- Provide workers with accessible and confidential grievance and reporting mechanisms and protect individuals who raise concerns from retaliation.
- Investigate suspected cases promptly and implement appropriate corrective, preventive, and remediation measures.



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Quantitative Commitments and Targets

Baseline Year: 2023 | Target Year: 2030

1. Employee Health, Safety, and Well-being

- Reduce the rate of reported work-related injuries by 15% by 2030, compared with the 2023 baseline, through hazard identification, preventive controls, employee training, and corrective actions.
- Ensure 100% of employees complete required occupational health and safety training annually by 2030.
- Install, upgrade, and maintain adequate first aid and emergency response systems in 100% of production and relevant workplace areas by 2030.
- Conduct 100% workplace health and safety risk assessments annually and ensure significant identified risks are addressed through documented corrective actions by 2030.
- Ensure 100% of reported work-related incidents and significant near misses are investigated and documented, with appropriate corrective and preventive actions implemented by 2030.

2. Inclusive and Respectful Workplace Culture

- Ensure 100% of employees receive mandatory training on non-discrimination, harassment prevention, and respectful workplace practices annually by 2030.
- Increase employee awareness and appropriate use of grievance and reporting channels by 20% by 2030, compared with the 2023 baseline, as an indicator of trust, accessibility, and employee engagement.
- Maintain a 100% investigation and resolution rate for formally reported discrimination, harassment, and workplace misconduct cases, subject to applicable investigation procedures and timelines.
- Ensure 100% of substantiated discrimination or harassment cases have documented corrective and/or disciplinary actions and appropriate remediation by 2030.
- Provide 100% of employees with access to confidential grievance and reporting mechanisms, including clear information on non-retaliation, by 2030.



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3. Fair and Ethical Working Conditions

- Achieve and maintain 100% compliance with applicable working-hour limits, overtime requirements, and minimum wage regulations by 2030.
- Ensure 100% of eligible employees have access to legally required paid leave and applicable medical/welfare benefits by 2030.
- Conduct annual working-condition assessments covering 100% of company facilities by 2030, including working hours, wages, benefits, leave, workplace conditions, and employee welfare.
- Ensure 100% of identified significant non-compliances related to working conditions have documented corrective action plans and are addressed within defined timelines by 2030.
- Maintain 100% documented and accurate records of working hours, overtime, wages, leave, and applicable employee benefits to support compliance monitoring by 2030.

4. Prevention of Child and Forced Labor

- Conduct labor and human rights compliance assessments of 100% of identified high-risk suppliers and contractors annually by 2030, with documented corrective action plans for significant findings.
- Maintain zero confirmed incidents of child labor, forced labor, bonded labor, or involuntary labor across company operations annually.
- Complete age and identity verification for 100% of new employees before employment commencement by 2030.
- Ensure 100% of employees and relevant recruitment personnel receive awareness training on child labor, forced labor, human trafficking, and modern slavery requirements annually by 2030.
- Ensure 100% of identified cases or credible allegations of child or forced labor are promptly investigated and, where substantiated, subject to documented remediation and corrective action.

5. Social Dialogue and Freedom of Association

- Ensure 100% of employees have access to accessible grievance, consultation, and worker-representation mechanisms by 2030.
- conduct at least two formal employee representative or worker consultation meetings annually, with documented minutes, concerns raised, and follow-up actions.
- Ensure 100% of employees receive information on their rights to freedom of association, collective dialogue, and grievance mechanisms at least annually by 2030.
- Ensure 100% of substantiated concerns related to freedom of association or worker representation are investigated and addressed through documented corrective actions.



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6. Respect for External Stakeholders and Human Rights

- Conduct human rights impact assessments for 100% of new site developments and major expansion projects by 2030, where relevant human rights risks are identified.
- Provide an accessible stakeholder grievance mechanism covering 100% of relevant external stakeholders by 2030.
- Acknowledging 100% of documented stakeholder human rights complaints within 7 working days and resolving or formally progress 100% within 30 days, were reasonably practicable and subject to case complexity.
- Ensure 100% of identified significant human rights impacts have documented corrective, preventive, or remediation actions.

7. Career Development and Learning

- Increase average annual training hours per employee by 20% by 2030, compared with the 2023 baseline.
- Provide relevant skills-development or competency-building opportunities to 100% of employees annually by 2030.
- Ensure 100% of employees receive documented training needs identification or performance/development discussions annually by 2030.
- Fill at least 30% of eligible team-leader and supervisory vacancies through internal candidates by 2030, subject to competency and vacancy requirements.

8. Prevention of Discrimination and Harassment

- Provide annual anti-discrimination, anti-harassment, respectful workplace, and non-retaliation training to 100% of employees by 2030.
- Train 100% of managers and supervisors annually on identifying, preventing, reporting, and appropriately responding to discrimination and harassment concerns.
- Conduct an annual workplace climate or employee engagement survey covering 100% of the workforce, with documented analysis and improvement actions.
- Ensure 100% of formally reported discrimination and harassment complaints are documented, investigated, and addressed according to established procedures and timelines.
- Ensure 100% of substantiated cases have documented corrective, disciplinary, and/or remedial actions, as appropriate.



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9. Prevention of Human Trafficking and Modern Slavery

- Conduct compliance due diligence or audits covering 100% of recruitment agencies and labor contractors by 2030, with increased frequency or enhanced due diligence for higher-risk providers.
- Including anti-trafficking, forced labor, and modern slavery requirements in 100% of applicable supplier, recruitment agency, and labor contractor agreements by 2030.
- Provide modern slavery and human trafficking risk training to 100% of relevant HR, procurement, supply chain, recruitment, and management personnel annually by 2030.
- Conduct documented human trafficking and forced-labor risk assessments for 100% of high-risk recruitment agencies, labor contractors, and suppliers annually by 2030.
- Ensure 100% of identified or credible allegations of trafficking or modern slavery are investigated and, where substantiated, subject to documented remediation and corrective action.



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Governance, Responsibilities and Accountability

Shovon Knitwear Ltd. ensures effective implementation of this Labor and Human Rights Policy through a structured governance framework with clearly defined responsibilities, accountability, monitoring, and reporting mechanisms across all levels of the organization.

1. Board of Directors

- Provide oversight of the Company's labor and human rights strategy and ensure alignment with applicable laws, ethical principles, and company commitments.
- Review the effectiveness of the Labor and Human Rights Policy and associated performance objectives at appropriate intervals.
- Hold executive management accountable for effective implementation, performance, risk management, and continual improvement.
- Ensure adequate resources are available to address significant labor and human rights risks.

2. Human Resources Department

- Develop, implement, and maintain workplace policies covering fair recruitment, equal opportunity, compensation, benefits, working conditions, employee development, and employee relations.
- Ensure compliance with applicable requirements related to wages, working hours, leave, benefits, and employment conditions.
- Coordinate employee training and awareness programs on labor rights, non-discrimination, harassment prevention, workplace conduct, grievance mechanisms, and other relevant topics.
- Support employee engagement, consultation, and career development initiatives.
- Maintain appropriate records relating to employment, training, grievances, disciplinary actions, and employee development while protecting confidentiality and personal information.



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3. Health & Safety Committee

- Implement and monitor occupational health and safety requirements across applicable workplaces.
- Conduct regular workplace hazard identification, risk assessments, inspections, and emergency preparedness exercises.
- Monitor health and safety performance indicators and recommend preventive and corrective actions.
- Investigate workplace incidents, accidents, and significant near misses and monitor implementation of corrective actions.
- Promote employee participation and awareness in occupational health and safety matters.

4. Compliance and Audit Team

- Monitor compliance with applicable labor and human rights laws, company policies, customer requirements, and relevant ethical standards.
- Conduct or coordinate internal assessments and, where applicable, supplier and contractor labor and human rights due diligence.
- Monitor grievance mechanisms and support timely, fair, confidential, and non-retaliatory handling of reported concerns.
- Maintain appropriate evidence of assessments, findings, corrective actions, training, grievances, and performance monitoring.
- Report significant risks, non-conformities, incidents, and improvement opportunities to management.
- Monitor corrective and preventive actions and verify their effectiveness.

5. Managers and Supervisors

- Implement the Labor and Human Rights Policy within their respective areas of responsibility.
- Promote respectful, inclusive, safe, and non-discriminatory workplace practices.
- Ensure employees receive required training and understand applicable workplace requirements.
- Escalate reported concerns, incidents, and potential policy violations through established procedures.



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- Prohibit retaliation against employees who raise concerns in good faith.

6. Employees

- Comply with applicable company policies, workplace standards, and legal requirements.
- Participate in required training, awareness, consultation, and workplace improvement activities.
- Treat colleagues and other stakeholders with dignity, respect, and fairness.
- Report suspected violations, unsafe conditions, discrimination, harassment, labor-rights concerns, or other misconduct through available reporting mechanisms.
- Cooperate appropriately with investigations and corrective actions.

This governance framework establishes shared responsibility and accountability for the implementation, monitoring, and continual improvement of Shovon Knitwear Ltd.'s labor and human rights commitments.

Monitoring, Reporting and Continuous Improvement

Shovon Knitwear Ltd. is committed to transparency, accountability, effective monitoring, and continual improvement of its labor and human rights performance. The Company maintains appropriate processes to monitor performance, identify risks, address concerns, and communicate relevant results to management and stakeholders.

1. Performance Monitoring

- Regularly monitor labor and human rights performance against established policies, objectives, KPIs, and quantitative targets.
- Monitor indicators including occupational injuries, training completion, working hours, wages and benefits, grievances, employee engagement, discrimination and harassment cases, supplier assessments, and corrective actions.
- Conduct periodic internal assessments and audits to evaluate compliance with applicable labor laws, occupational health and safety requirements, company policies, and relevant customer or industry requirements.
- Review significant findings and trends to identify systemic risks and opportunities for improvement.
- Benchmark relevant performance against applicable legal, customer, and industry expectations where appropriate.



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2. Incident, Grievance and Remediation Reporting

- Maintain accessible, confidential, and appropriate grievance and reporting channels for employees and relevant external stakeholders.
- Protect individuals who raise concerns in good faith from retaliation or adverse treatment.
- Record, assess, investigate, and resolve reported grievances and incidents according to documented procedures and defined timelines.
- Maintain appropriate records of complaints, investigations, corrective actions, remediation, and closure.
- Analyze grievance and incident data to identify recurring issues, root causes, and emerging labor and human rights risks.
- Implement corrective, preventive, and remediation measures where adverse impacts or policy violations are identified and monitor their effectiveness.

3. Stakeholder Engagement

- Maintain regular dialogue with employees, worker representatives, suppliers, contractors, and other relevant stakeholders regarding labor and human rights matters.
- Use employee feedback, grievance trends, consultation outcomes, assessments, and other relevant information to improve policies and practices.
- Provide appropriate training and awareness programs to strengthen understanding of labor rights, workplace responsibilities, grievance mechanisms, and ethical conduct.
- Engage relevant suppliers and business partners on applicable labor and human rights expectations and improvement requirements.

4. Management Review and Reporting

- Consolidate relevant labor and human rights performance data and report significant risks, incidents, trends, and progress against targets to senior management at defined intervals.
- Review the effectiveness of policies, procedures, grievance mechanisms, training programs, and corrective actions at least annually.
- Establish corrective and improvement actions where performance does not meet defined objectives or applicable requirements.



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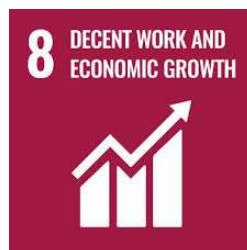
- Maintain documented evidence of management reviews, performance monitoring, action plans, and follow-up activities.
- Update the Labor and Human Rights Policy and associated objectives when necessary to reflect changes in legal requirements, business operations, stakeholder expectations, identified risks, and lessons learned.

5. Continuous Improvement

- Use audit findings, risk assessments, employee feedback, grievance data, incident investigations, stakeholder engagement, and performance trends to identify opportunities for continual improvement.
- Track corrective and preventive actions to completion and verify their effectiveness.
- Review progress against the 2023 baseline and 2030 quantitative targets and revise actions where performance is not on track.
- Promote a culture of accountability, transparency, respect, and continual improvement throughout the Company's operations and relevant business relationships.

This monitoring and reporting framework supports Shovon Knitwear Ltd.'s commitment to responsible business conduct, respect for human rights, transparency, accountability, and continual improvement.

Covered SDGs





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Review Mechanism

Shovon Knitwear Ltd. shall review this Labor and Human Rights Policy at least annually to ensure its continued effectiveness, relevance, and alignment with applicable labor laws, internationally recognized human rights principles, and the Company's sustainability commitments. The review shall consider labor and human rights risks, audit findings, employee grievances, corrective actions, stakeholder feedback, and progress against established objectives and targets. The policy shall also be updated whenever significant changes in legal requirements, business operations, or identified risks necessitate revision. All revisions shall be documented, approved by authorized management, and communicated to relevant employees and stakeholders. Records of policy reviews, approvals, updates, and communication shall be maintained as evidence of implementation and continual improvement



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Employee Acknowledgement Form

I acknowledge that I have received, read, and understood the Shovon Knitwear Ltd. Labor and Human Rights Policy. I understand the Company's commitment to respecting human rights, promoting ethical labor practices, ensuring fair treatment, and protecting the dignity, health, safety, and well-being of employees and other relevant stakeholders.

I agree to support and comply with the Policy, applicable labor laws, workplace rules, and Company requirements. I understand my responsibility to contribute to a workplace that promotes:

- Equal opportunity and non-discrimination.
- Prevention of harassment, abuse, forced labor, and child labor.
- Fair wages, reasonable working hours, and decent working conditions.
- Freedom of association and respect for workers' rights.
- Occupational health, safety, and employee well-being.
- Respectful treatment, diversity, inclusion, and human dignity.

I commit to reporting suspected violations, misconduct, discrimination, harassment, unsafe conditions, or other labor and human rights concerns through the Company's established grievance and reporting mechanisms. I understand that concerns raised in good faith must be handled appropriately and that retaliation against individuals who raise concerns in good faith is prohibited.

I also agree to participate in relevant training, awareness programs, consultations, and improvement initiatives to strengthen the Company's labor and human rights performance.

By signing below, I confirm that I have understood my responsibilities and will support the effective implementation of the Labor and Human Rights Policy.

Employee Name: Adnan Rakib

Employee ID: 2500000091

Department: HR & Compliance

Designation: Executive ECR

Signature:

Date: 11.09.2026