

Creative Graphics Group

Human Rights Policy

Review Date	Version	Reviewed By	Approved By
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1. Purpose

Creative Graphics Group (hereinafter “the Company”) is committed to respecting and upholding human rights across all its business processes, operations, and relationships. This Human Rights Policy (“the Policy”) establishes the Company’s formal commitment to ensuring that its activities do not cause, contribute to, or enable violations of human rights - whether through direct operations or supply chain relationships.

The Policy is aligned with the International Labour Organization (ILO) Fundamental Rights at Work, the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), and applicable Indian legislation including the Industrial Relations Code 2020, the POSH Act 2013, and the Digital Personal Data Protection Act 2023.

2. Scope

This Policy applies to Creative Graphics Group and its subsidiaries. It is binding on all levels and functions, including Directors, Senior Managers, Officers, permanent and fixed-term employees, consultants, trainees, interns, agency staff, and any other person acting for and on behalf of the Company.

3. Definitions

- **“Company”** refers to Creative Graphics Group and its subsidiaries.
- **“Human Rights”** are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status, as recognised in the UDHR and related international instruments.
- **“Child Labour”** refers to work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.
- **“Forced Labour”** refers to all work or service exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily.
- **“Collective Bargaining”** is a process through which employees and employers engage in two-way communication to establish fair wages, working conditions, and other employment terms.
- **“Grievance Mechanism”** refers to a formal channel through which employees and stakeholders may raise concerns, report violations, and seek redressal in a safe and confidential manner.
- **“Policy”** refers to this Human Rights Policy.

4. Policy Commitments

4.1 Equal Opportunity and Non-Discrimination

The Company is committed to equal opportunity and fair treatment across all aspects of employment, including hiring, compensation, promotion, training, and separation. The Company strictly prohibits discrimination on the basis of religion, caste, creed, colour, race, ancestry, marital status, gender, gender identity or expression, sexual orientation, age, nationality, ethnicity, pregnancy, disability, political views, or any other category protected by applicable law. The Company is equally committed to diversity, inclusion, and equitable access to professional development opportunities for all employees, and to building a workforce that reflects equitable representation across functions, levels, and geographies.

4.2 Prohibition of Child Labour

The Company maintains a zero-tolerance stance on child labour in all forms. The Company strictly complies with all applicable regulations, including the Child Labour (Prohibition and Regulation) Amendment Act and relevant ILO Conventions, to ensure that no child labour is engaged in its operations or along its value chain. Age verification shall be conducted diligently during all hiring processes, and suppliers are required to uphold the same standard.

4.3 Prohibition of Forced Labour

The Company is firmly committed to the prohibition of forced labour and modern slavery. No worker shall be compelled to perform services under threat, coercion, or penalty, and all employees retain the unconditional right to terminate their employment in accordance with their contract terms. The Company shall not retain identity documents as a condition of employment and shall ensure that these standards are upheld across its supply chain as feasible.

4.4 Labour Standards and Fair Wages

The Company ensures full compliance with all applicable regulations governing wages, work hours, leave, and statutory benefits, including provident fund, gratuity, and employee state insurance. Remuneration shall be fair, competitive, and free of unauthorised deductions. Employment terms shall be set out in clear written agreements and explained at onboarding. Working hours shall remain reasonable, overtime shall be voluntary and appropriately compensated, and adequate rest periods shall be provided in line with statutory requirements.

The Company also respects the right of all employees to engage in collective bargaining and to form or join trade unions and representative bodies of their choosing, in accordance with applicable laws, without fear of intimidation or retaliation. Where workers seek collective

representation, the Company shall engage in good-faith dialogue and implement agreed outcomes diligently.

4.5 Health and Safety in the Workplace

The Company is committed to providing a safe, hygienic, and healthy working environment for all employees and contractors. The Company shall comply with applicable occupational health and safety legislation and shall conduct periodic risk assessments and safety training to prevent occupational hazards to the maximum extent possible. The Company recognises mental health as an integral component of employee well-being and promotes a culture of psychological safety.

4.6 Prevention of Sexual Harassment

Any act of sexual harassment in any work-related context is strictly prohibited and constitutes a serious disciplinary offence. In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (POSH Act), the Company has constituted an Internal Complaints Committee (ICC) to receive and resolve complaints fairly, confidentially, and within prescribed timelines. Retaliation against complainants or witnesses is expressly prohibited. Employees are encouraged to refer to the Company's [Policy on Prevention of Sexual Harassment](#) for detailed procedures.

4.7 Data Privacy

The Company is committed to maintaining the confidentiality of personal data of all employees and stakeholders and to upholding data protection rights at all times. Personal data shall be collected, processed, and stored only on a lawful basis, in compliance with the Digital Personal Data Protection Act 2023 (DPDPA) and all applicable data privacy frameworks. Any data breach will be treated with utmost urgency and addressed in compliance with applicable laws and confidentiality principles. Please refer to our Cybersecurity and Data Privacy Policy for further details.

5. Roles and Responsibilities

The Chief Human Resources Officer (CHRO) is the Policy Owner and is responsible for overseeing the implementation, communication, and review of this Policy across the Company. The CHRO shall meet with the Board of Directors bi-annually to present comprehensive updates on progress against Policy commitments and any material human rights incidents or trends.

All managers and supervisors are personally responsible for upholding the standards of this Policy within their respective teams and for ensuring that concerns raised by employees are escalated through the appropriate channels without delay. Non-compliance by any employee,

contractor, or agent may result in disciplinary action, including termination of employment or contract.

6. Communication and Training

This Policy is made available to all stakeholders on the Company's website and internal communication platforms. All new employees receive an orientation on the Company's human rights commitments and grievance mechanisms at the time of joining, with the aim of ensuring 100% coverage at onboarding. In addition, all employees are regularly trained on human rights awareness, applicable policies, and the reporting mechanisms available in case of any violations. Training records are maintained and reviewed periodically to ensure adequate coverage. The Company also communicates its human rights expectations to suppliers and contractors and encourages them to uphold equivalent standards across their own operations. The Company also aims to embed human rights due diligence considerations into supplier onboarding and procurement processes, with periodic compliance reviews conducted as appropriate.

7. Monitoring and Review

The CHRO is responsible for monitoring the effectiveness of this Policy and presenting updates to the Board of Directors for final approval. The Policy undergoes a formal review once every two years, or earlier if necessitated by changes in applicable law, material human rights incidents, or evolving international standards. Input from internal and external stakeholders - including employees, suppliers, customers, and regulatory bodies - is integrated to improve the Policy's effectiveness on an ongoing basis.

8. Grievance Mechanism

The Company seeks to identify, prevent, mitigate, and account for adverse human rights impacts and to adequately address any violations through its grievance redressal mechanism.

The Company maintains a zero-tolerance stance on violations of the human rights commitments outlined in this Policy. Any concern may be reported through our designated channel at chro@creativegraphics.net.in. All complaints will be treated with the utmost confidentiality and addressed in a timely manner. Continued or repeated violations may result in strict action in compliance with applicable laws and regulations.

The Company also recognises the importance of its relationship with the communities within which it operates and who may be impacted by its business. Any human rights violations within these communities, arising in direct relation to the Company's business processes, will be addressed appropriately.

Retaliation against any individual who raises a concern under this Policy is strictly prohibited and will result in disciplinary action.

9. Related Policies

This Policy should be read alongside the following policies of Creative Graphics Group:

S. No.	Policy
1	Cybersecurity and Data Privacy Policy
2	Policy on Prevention of Sexual Harassment
3	Supplier Code of Conduct
