

JKSML	JK Sugar Mills (Pvt.) Limited.	DOC# JKSML/Policies/HR/003 Revision No. 01 Effective Date: May 18, 2026
	<i>Human Rights Policy</i>	

Purpose

The purpose of this policy is to uphold and protect the fundamental human rights of all individuals engaged with JK Sugar Mills (Pvt.) Ltd., including employees, workers at registered farms, and other stakeholders. JK Sugar Mills is committed to ensuring a workplace and supply chain that are free from discrimination, harassment, child labor, forced labor, and any other violations of human rights. This policy is guided by and aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), reinforcing our responsibility to respect human rights and to prevent, mitigate, and address adverse impacts connected to our operations, products, or services. It reflects our commitment to ethical, fair, and lawful practices in every area of our operations.

Scope

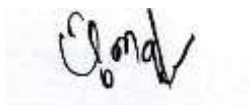
- JK Sugar Mills Site and all its activities/operations
- Registered Cane Growers and their workers.
- All persons interacting with JK Sugar Mills, including contractors, suppliers and visitors.

Terms and Definitions


- **Human Rights:** Fundamental rights and freedoms that belong to every person, regardless of race, gender, nationality, religion or any other status. These rights include, but are not limited to, the right to life, liberty, and security of person, freedom of speech, freedom of assembly, and freedom from slavery and torture.
- **Discrimination:** Any unfair or unequal treatment of individuals based on characteristics such as gender, race, religion, age, nationality, disability or other protected statuses.
- **Harassment:** Unwanted and inappropriate conduct, including verbal, physical, or non-verbal behavior, that creates a hostile, intimidating or offensive work environment.
- **Child Labor:** The employment of children in work that deprives them of their childhood, education, or potential and is harmful to their physical or mental development.
- **Forced Labor:** Any work or service that individuals are coerced to perform against their will, often under the threat of punishment or harm.

Management Commitments

- JK Sugar Mills is committed to respecting human rights in all of its operations, including supply chains and registered farms.
- We strive to create a safe, inclusive, and respectful work environment free from all forms of discrimination and harassment.
- We prohibit the use of child labor, forced labor, or any other form of involuntary labor within our operations and supply chain.



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- We ensure compliance with all applicable labor laws, human rights standards, and ethical business practices.
- We aim to provide fair wages, safe working conditions, and equal opportunity for all workers.
- We take necessary measures to prevent retaliation against individuals who report human rights violations, including harassment, discrimination, or forced labor.

Procedure

Reporting and Complaint Mechanism

Employees and workers are encouraged to report any incidents of discrimination, harassment, or forced labor without fear of retaliation. A grievance mechanism is in place to ensure that complaints are addressed promptly and fairly.

- Complaints should be reported to the HRD or designated management representative.
- All complaints will be treated confidentially and will be investigated in accordance with company policy.
- Retaliation against employees who report violations will not be tolerated.

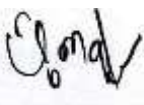
Disciplinary Actions for Violations

Any employee or contractor found to be involved in discriminatory or harassing behavior, or involved in child or forced labor, will face disciplinary action, which may include verbal/written warnings, suspension, or termination, depending on the severity of the violation.


- In cases of child labor or forced labor, the company will immediately take corrective action, which may include the removal of the affected individual from the workplace, repatriation to their home country (if applicable), and reporting the incident to relevant authorities.

Child Labor and Forced Labor Prevention

- JK Sugar Mills does not tolerate child labor in any form. We will not employ anyone under the legal working age as defined by national and international laws.
- JK Sugar Mills does not tolerate forced labor, including bonded, indentured, or any form of involuntary work.
- We ensure that workers' documents, such as identity cards, are not held by the employer without consent.
- We will not engage in any practices that restrict the free movement or financial freedom of workers, such as illegal wage deductions or compulsory overtime.



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Equal Opportunity and Non-Discrimination

- JK Sugar Mills promotes equal employment opportunities and prohibits discrimination based on race, colour, gender identity, age, language, religion, property/ wealth, nationality, ethnic/social origin, caste, disability, pregnancy, indigeneity, union affiliation, political affiliation, marital/family status, personal relationships, health status, sexual orientation or other non-valid reasons that are irrelevant to the skills, capabilities, qualities and medical fitness for the job.
- We will take immediate corrective actions if any employee is found to be subjected to discrimination.

Harassment Prevention and Zero Tolerance

- We maintain a zero-tolerance policy for any form of harassment in the workplace, including but not limited to verbal abuse, physical harassment, or any other intimidating behavior.
- Employees found guilty of harassment will face strict disciplinary measures, including termination in severe cases.
- The company will ensure the confidentiality of all harassment complaints and will investigate incidents thoroughly and promptly.

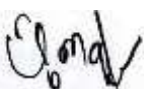
Due Diligence

We will conduct regular assessments to ensure compliance with this Human Rights Policy and the principles of non-discrimination, anti-harassment, and prohibition of child and forced labor. The due diligence process includes:


- Regular audits and reviews of labor practices and conditions at JK Sugar Mills and registered farms.
- Engagement with stakeholders, including workers and labor unions, to identify potential risks and address any concerns.
- Review of supply chain practices to ensure that suppliers and contractors adhere to human rights standards.
- Continuous improvement in human rights practices and measures based on feedback and audits.

Protection and Anonymity of Whistleblowers

JK Sugar Mills (Pvt.) Ltd. is committed to fostering a culture of openness and transparency, where individuals feel safe to report concerns about violations of this policy or any unethical behavior without fear of retaliation.



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1. Protection of Whistleblowers

Non-Retaliation: JK Sugar Mills strictly prohibits any form of retaliation against whistleblowers who report concerns in good faith. Retaliatory actions, such as harassment, discrimination, or termination, will result in disciplinary measures against those responsible.

Support Mechanisms: Whistleblowers will have access to support from the Human Resources Department to address any challenges or concerns arising after reporting.

2. Anonymity of Whistleblowers

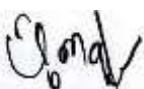
Confidential Handling: All reports, whether anonymous or not, will be handled with strict confidentiality. Information about the whistleblower's identity or the details of the report will only be disclosed to authorized personnel on a need-to-know basis for investigation purposes.

Responsibilities


- **Employees:** All employees have a responsibility to respect the rights and dignity of others, to adhere to this policy, and to report any violations promptly.
- **Managers:** Managers are responsible for ensuring that their teams comply with this policy and for addressing any violations.
- **HR Department:** The HR department is responsible for implementing training programs, managing complaints, and ensuring that all employees are treated fairly and respectfully.

Review

This policy will be reviewed every three years, or as required, to ensure compliance with changing labor laws and industry standards. The Company reserves the right to amend or update this policy without prior notice, subject to applicable laws.



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