ChrysCapital

Human Rights Policy

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Distribution	All Employees

Amendment Sheet			
Sr. No.	Date	Revision Status	Reason for Amendment
1.	July 2026	Initial Release	NA

I. Purpose:

This policy sets out ChrysCapital's commitment to upholding, promoting, and respecting human rights across all operations and value chain. The commitment is rooted in the internationally recognized frameworks such as the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Core Conventions, International Bill of Human Rights, OECD Guidelines for Multinational Enterprises, United Nations Global Compact (UNGC) Principles and the United Nations-backed Principles for Responsible Investment (PRI).

II. Policy Scope:

The Human Rights Policy applies to ChrysCapital Group's own operations and its activities. This policy applies to ChrysCapital employees (full-time, part-time, permanent or temporary, at every level), Partners and Directors of the Group. ChrysCapital encourages its suppliers, service providers, portfolio companies and business partners to align with human rights standards consistent with this policy.

In the context of ChrysCapital Group's investing model, the human rights risks may arise through portfolio companies. This policy is intended to guide both internal practices and investment-related recommendation-making of the advisory team of ChrysCapital.

The policy applies to:

1. Portfolio companies of the ChrysCapital Group[1]
2. All ChrysCapital Investment Funds, ChrysCapital Investment Managers and their advisors, including operations advisory team, ESG advisory team, and compliance advisory teams.
3. All material ESG events, whether actual, alleged, or potential.

[1] The policy is applicable to portfolio companies that are part of ChrysCapital VIII, LLC, ChrysCapital IX, LLC, ChrysCapital X, LLC, their SPVs and subsidiaries and any other private equity fund that may be launched by ChrysCapital Group in the future and their SPVs and subsidiaries.

III. Human Rights Due Diligence:

ChrysCapital approaches human rights as an integral part of its broader ESG due diligence undertaken by the ChrysCapital Group. Environmental, Social and Governance due diligence is conducted by the ChrysCapital Group for all investments in accordance with the Responsible Investment Policy, and human rights risks are considered as part of that assessment.

Where human rights risk is assessed as high – having regard to sector, geography, workforce profile and other relevant factors, ChrysCapital will evaluate the need, to make a recommendation to the ChrysCapital Group, for a specific human rights due diligence exercise, scaled to the nature and severity of the potential impact. This may include identifying salient risks, assessing actual and potential impacts, integrating findings into investment recommendations and post-investment engagement, tracking effectiveness, and communicating progress.

Where actual or potential adverse human rights impacts are identified, ChrysCapital will engage with affected or potentially affected stakeholders, or their legitimate representatives, and consider their perspectives in shaping mitigation and remediation.

In assessing salient risks, ChrysCapital may consider factors including:

1. Sector-specific risks
2. Geographic and regulatory context
3. Workforce composition and labour practices
4. Supply chain characteristics
5. Community and stakeholder impacts

IV. Focus Areas:

1. Legal Compliance

ChrysCapital is committed to complying with all applicable national laws and regulations as well as internationally recognized human rights standards. In situations where national laws conflict with international human rights norms, ChrysCapital will seek ways to respect internationally recognized human rights to the greatest extent practicable within our sphere of influence.

2. Non-Discrimination

ChrysCapital strictly prohibits discrimination, bullying, retaliation, or harassment based on race, colour, religion, caste, sex, national origin, age, disability, sexual orientation, or any other status protected by applicable laws. All individuals shall be treated with dignity, fairness, and respect.

3. Prevention of Child Labour

ChrysCapital does not employ individuals under the age of 18 or under the minimum age for employment as defined by local laws, whichever is higher. It has zero tolerance for exploitation of children in any form and ensures that young workers are not exposed to hazardous work conditions.

4. Prevention of Forced or Bonded Labour

ChrysCapital ensures that all employment is voluntary. It prohibits any form of forced, bonded, or involuntary labour, including prison labour, indentured labour, and human trafficking.

5. Prevention of Trafficking and Modern Slavery

ChrysCapital has zero tolerance for human trafficking and modern slavery in any form. ChrysCapital is committed to limiting the risk of modern slavery within its own business, its investments, supply chain or through any other business relationships.

6. Freedom of Association and Collective Bargaining

ChrysCapital respects the right of its employees to form or join labour unions (as permitted by local laws) in their personal capacities in a manner that does not create an actual or potential conflict with the interests of ChrysCapital.

7. Workplace Health and Safety

ChrysCapital is committed to providing a safe and healthy work environment, including adequate rest, welfare facilities, and protective equipment where required, for all employees. It shall implement safety protocols, provide necessary training, and regularly assess workplace risks to prevent accidents and injuries.

8. Wages, Working Hours, and Benefits

ChrysCapital ensures that all employees and workers receive fair compensation that meets or exceeds the legal minimum wage or industry standards, whichever is higher. It respects the right to reasonable working hours. All employees are entitled to benefits such as rest days, paid leave, and social security contributions, as defined by local regulations. ChrysCapital strives to promote a healthy work-life balance and discourage excessive or exploitative working conditions. ChrysCapital supports the principle of a living wage and encourages its portfolio companies to progressively move towards compensation practices that meet workers' basic needs and provide discretionary income, where feasible.

9. Equal Gender Rights

ChrysCapital prohibits discrimination based on gender. It supports rights to equal pay, opportunities for advancement, and a workplace free from harassment and discrimination. Every employee is entitled to applicable policies as mandated by law and any additional applicable policy in ChrysCapital.

10. Rights of Persons with Disabilities

ChrysCapital ensures that individuals with disabilities have equitable access to employment opportunities, workplace facilities, information, and resources. It is committed to providing reasonable accommodations to create an accessible and enabling workplace. Discrimination, harassment, or exclusion based on disability is strictly prohibited.

11. Protection of Vulnerable and Marginalised Groups

ChrysCapital recognises that certain individuals and groups may face heightened risks of adverse human rights impacts due to social, economic, legal, or cultural vulnerabilities. The Group is committed to respecting and promoting the rights of all workers and affected stakeholders, including migrant workers, contract and temporary workers, gig and informal workers, indigenous peoples, local communities, religious and ethnic minorities, LGBTQ+ individuals, and other vulnerable or marginalised groups.

ChrysCapital seeks to ensure that such persons are treated with dignity, fairness, and respect, and are protected from discrimination, exploitation, harassment, retaliation, unsafe working conditions, and unequal access to opportunities or remedies.

12. Right to Privacy

ChrysCapital respects the privacy rights of its employees and other stakeholders. It handles personal data responsibly and in compliance with applicable data protection laws.

13. Transparency and Fair Communication

ChrysCapital is committed to providing its employees with accurate, timely, and transparent information about matters that may affect them. It shall offer a true and fair view of the Group's operational and financial performance, employment trends, material risks, and foreseeable changes that may impact operations.

To balance transparency with the legitimate requirements of business confidentiality, certain sensitive information may be withheld or shared only with appropriate safeguards. Any such decisions will be made responsibly and in keeping with applicable laws, ethical standards, and the rights and interests of the employees.

14. Training

ChrysCapital will conduct planned training sessions for employees and senior management, to build awareness of human rights risks and responsibilities. It will also regularly share the principles of this policy to its Portfolio Companies and other stakeholders, as appropriate.

15. Investment Recommendatory Activities

Human rights considerations are integrated in ChrysCapital's screening, due-diligence process for all the potential investment recommendations it seeks to make as well as its role post the investment by the ChrysCapital Group. As part of its ESG value creation plan of the ChrysCapital Group, ChrysCapital will work closely with portfolio companies of the ChrysCapital Group to explore the development of a Human Rights Policy and a process to periodically review, discuss and report Human Rights performance at the appropriate level.

Depending on the nature of the level of influence, and risk profile, ChrysCapital will seek to encourage and support portfolio companies of the ChrysCapital Group to:

a) Adopt and review from time to time, human rights policies (including labour and workplace policies) aligned with international standards.

b) Implement appropriate human rights due diligence processes.

c) Implement grievance and whistleblower mechanisms accessible to all relevant stakeholders.

d) Provide relevant training and awareness programmes for employees and management.

e) Track and report significant human rights risks, incidents, and remediation actions to the appropriate governance bodies.

Report material human rights incidents

ChrysCapital will also seek to engage with portfolio companies of the ChrysCapital Group to improve human rights performance and may escalate concerns where risks are not being addressed.

16. Remediation of Human Rights Violations

If ChrysCapital identifies that it has caused or contributed to an adverse human rights impact, it will take prompt action to remediate the harm, either directly or in collaboration with relevant stakeholders, including portfolio companies of the ChrysCapital Group and other partners. Where ChrysCapital is directly linked to an adverse impact through the investments of the ChrysCapital Group, it will encourage appropriate remediation by the relevant parties.

Where ChrysCapital becomes aware of material human rights risks or adverse impacts within a Portfolio Company of the ChrysCapital Group, it will seek to engage constructively with the ChrysCapital Group and the management and relevant governance bodies of such portfolio company of the ChrysCapital Group to encourage appropriate mitigation and remediation measures. Where concerns remain unaddressed, ChrysCapital may escalate the matter through available governance mechanisms, including board representation of the ChrysCapital Group, shareholder engagement, or other appropriate channels consistent with the rights of the ChrysCapital Group and their level of influence.

In situations involving multiple adverse impacts, ChrysCapital will prioritise the most severe cases and act with urgency, recognizing that delays may limit the effectiveness of remediation. ChrysCapital will cooperate in legitimate remediation processes and seek to enable access to remedy for affected stakeholders.

V. Grievance Redressal and Remediation:

ChrysCapital is committed to open and transparent communication as a cornerstone of a progressive and responsible workplace. Recognising that its role and influence differ across its own operations and the investee companies of the ChrysCapital Group, ChrysCapital approaches grievance redressal and remediation at two levels.

1. Fund-Level Applicability (ChrysCapital's Own Operations)

Employees, business partners, service providers, and other stakeholders connected to ChrysCapital's own operations are encouraged to raise any concerns, suspected impropriety, or wrongdoing related to human rights and their salient elements through the reporting channels set out in ChrysCapital's Whistleblower Policy, including confidential reporting lines and other designated mechanisms.

ChrysCapital will review such concerns in a fair and timely manner and will take appropriate preventive and remedial measures, including disciplinary and/or legal action where warranted, to mitigate adverse human rights impacts and support effective resolution.

ChrysCapital will ensure that grievance mechanisms within its own operations are:

a) Accessible

b) Confidential and, where appropriate, anonymous

c) Non-retaliatory

d) Fair and transparent

These mechanisms are intended to align with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights.

Where ChrysCapital identifies that it has caused or contributed to an adverse human rights impact through its own operations, remediation actions may include, as appropriate, corrective operational measures, compensation, restoration, or other forms of remedy for affected stakeholders.

2. Portfolio Company-Level Applicability

ChrysCapital expects its Portfolio Companies to establish and maintain their own grievance mechanisms for their employees, workers (including contract and migrant workers), business partners, communities, and other stakeholders where grievances can be submitted without any suffering. Such mechanisms should, to the extent appropriate to the Portfolio Company's size, sector, and context, be:

a) Accessible

b) Confidential and, where appropriate, anonymous

c) Non-retaliatory

d) Fair and transparent

and should align with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights.

Primary responsibility for receiving, investigating, and remediating human rights concerns at the Portfolio Company of the ChrysCapital Group level rests with such Portfolio Company itself. ChrysCapital Group, ChrysCapital Group, will engage with its portfolio entities to encourage the adoption and continuous improvement of such mechanisms as part of the ChrysCapital Group ESG engagement and value creation activities.

Where concerns cannot be adequately addressed at the Portfolio Company level, the ChrysCapital Group may, ChrysCapital Group, provide a channel for escalation. Such matters may be reviewed at an appropriate level within the group, and may include board representation of the ChrysCapital Group, shareholder rights, or active engagement – to encourage appropriate remediation by the relevant parties.

Where ChrysCapital is directly linked to an adverse impact through the ChrysCapital Group investments, it will cooperate in legitimate remediation processes and seek to enable access to remedy for affected stakeholders. Where concerns are not adequately addressed through the applicable portfolio company of the ChrysCapital Group mechanisms or engagement, ChrysCapital may escalate such matters through governance mechanisms at the highest levels, including, where warranted, reconsideration of the overall relationship with such entity.

VI. Review and Continuous Improvement:

The Human Rights Policy will be reviewed at least annually and updated as necessary to reflect changes in business operations, evolving human rights and international standards, and stakeholder expectations.

The ESG Lead is responsible for managing ESG due diligence at recommendatory stage and annual monitoring of portfolio companies including human rights matters, and for the day-to-day implementation of this Policy. The ESG Committee provides governance oversight of the ESG and human rights programme, including review of this policy and material human rights matters arising from due diligence, monitoring or grievance processes. Where escalation is required, the relevant investment advisory team will support the ESG function in using their relationship to encourage appropriate action by Portfolio Companies. ChrysCapital recognises that its ability to influence outcomes may vary across the Group: in majority or controlled investments of the Group, ChrysCapital maybe required to seek to promote alignment with the expectations outlined in this policy; but in minority investments of the Group, ChrysCapital may need to use its influence through board participation and active engagement to encourage and promote alignment.

ChrysCapital will report on its human rights approach, risks, and progress through ESG disclosures, and will include them in investor communications, and public reporting, including UN Global Compact Communication on Progress and UN PRI Transparency Report.

Annexure - Definitions

1. Human Rights - Human rights are the universal, indivisible, and inalienable rights that belong to all individuals by virtue of being human. These include civil, political, economic, social, and cultural rights, as articulated in the Universal Declaration of Human Rights and further elaborated in international human rights treaties
2. Human Rights Due Diligence - An ongoing risk management process by which a business identifies, prevents, mitigates, and accounts for how it addresses adverse human rights impacts in its operations and value chain.
3. Adverse Human Rights Impact - An act or omission that removes or reduces an individual's ability to enjoy their human rights.
4. Stakeholders - Individuals or groups who have interests that may be affected by a company's operations, products, or services, including employees, communities, customers, suppliers, and vulnerable groups.
5. Forced Labour - All work or service extracted from any person under the menace of penalty and for which they have not offered themselves voluntarily.
6. Child Labour - Work that is mentally, physically, socially, or morally dangerous for children, or that interferes with their schooling, as prohibited under international law.
7. Portfolio Companies referred hereinabove are the portfolio companies of SPVs of Investment Funds belonging to the ChrysCapital Group which are the indirect recipients of the Investment Advisory and support services provided by ChrysCapital Advisors, LLP.

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