

ACME SOLAR HOLDINGS LIMITED

HUMAN RIGHTS POLICY

1. Introduction

ACME Solar Holdings Limited (“ACME” or “Company”) recognizes that respecting and promoting human rights is fundamental to responsible, ethical, and sustainable business conduct. ACME is committed to respecting, supporting, and promoting the human rights across its operations and value chain.

2. Purpose

The Policy sets out the commitment to respecting, protecting, and promoting human rights across all aspects of its operations. This Policy sets out ACME’s approach to upholding internationally recognized human rights principles, in alignment with applicable laws and globally accepted standards such as the Universal Declaration of Human Rights, the International Labour Organization’s core conventions.

3. Applicability

This Policy applies to: (a) all employees (permanent, contractual, trainees and interns) and directors of the Company; (b) employees and directors of subsidiaries and entities where the Company exercises management or operational control, to the extent applicable; and (c) contractors, suppliers, service providers and other third parties authorised to represent the Company or its subsidiaries in interactions with government authorities, regulators, industry associations or public institutions.

4. Guiding Principles

ACME commits to the following guiding principles for respecting, protecting, and promoting human rights across all aspects of its operations:

a. Fundamental Rights, Dignity and Privacy

- i. Treating all individuals with dignity, fairness and respect, and maintaining a workplace free from discrimination, harassment or intimidation
- ii. Maintaining a zero-tolerance approach to any form of harassment, including sexual harassment.
- iii. Respecting the privacy rights of our employees, customers, and stakeholders at all times.
- iv. Protecting the personal data provided to the Company as per all applicable laws.

b. **Human Rights Due Diligence.** Conducting continuous Human Rights Due Diligence (HRDD) to identify and assess potential human rights impacts of our activities before undertaking a new activity.

c. **Prohibition of Forced & Child Labour.** Strictly prohibiting child labour, forced labour, modern slavery and human trafficking across our operations and supply chain

d. Safe, Healthy and Secure Working Conditions

- i. Providing a safe, healthy and inclusive working environment, with clear safety protocols and continuous improvement in occupational health and safety.
- ii. Maintaining a safe and secure workplace.

- e. **Freedom of Association & Fair Working Conditions.** Respecting employees' rights to freedom of association, collective bargaining and fair working conditions.
- f. **Diversity, Inclusion & Equal Opportunity.** Ensuring equal opportunity in employment and rejecting discrimination based on age, disability, gender, ethnicity, religion, or any protected characteristic
- g. **Community Rights & Engagement.** Respecting the rights and interests of communities surrounding our operations, and engaging transparently to minimise adverse impacts

5. Training and Awareness

ACME shall provide training and awareness programmes for employees and workers to strengthen understanding of human rights responsibilities, promote ethical conduct, and ensure consistent application of this Policy across operations.

6. Reporting and Grievance Redressal Mechanism

Any person covered by this Policy who wishes to raise a concern or report a potential violation of this Policy may do so by contacting the Company's Compliance Officer or through the Company's established grievance redressal mechanism, as communicated from time to time. The Company shall endeavour to address all concerns in a fair, timely, and confidential manner. No person shall be subject to retaliation for raising a concern in good faith.

7. Governance and Implementation

The Board of Directors is responsible for the approval and oversight of this Policy. The Corporate Social Responsibility and Sustainability Committee of the Board shall oversee the implementation of this Policy and review its effectiveness periodically. Senior management and the relevant functional heads shall be responsible for operationalising this Policy across the Company's operations and ensuring compliance with its requirements.

8. Review and Amendment

This Policy is approved by the Board of Directors of ACME. This Policy shall be reviewed periodically, or earlier if warranted by changes in applicable laws, regulations, business operations, or stakeholder expectations. Any material changes to this Policy shall be subject to the approval of the Board of Directors.

9. Version History:

Date of Board Approval	Particulars	Effective Date
27 th March 2026	Introduction and implementation of Human Rights Policy	27 th March 2026