

Executive Summary: Human Rights Risk Assessment (FY 2025-26)

Overview

In FY 2025-26, ACG conducted a comprehensive Human Rights Risk Assessment (HRRRA) through an independent third party. The assessment covered the 100% of ACG's own operations across multiple manufacturing sites and the corporate office, encompassing executive, management, non-management, permanent and contractual associates including men and women both. The exercise reflects ACG's continued focus on embedding respect for human rights into its governance, operations, and workplace culture, in line with evolving global ESG expectations.

Governance and Management Systems

ACG has established governance structures to support its human rights commitments, including defined responsibilities at the corporate and site levels, supported by policies, codes of conduct, and ethical oversight mechanisms. Human rights considerations are integrated within broader corporate governance and sustainability frameworks, with designated functions responsible for oversight of social and labor practices.

The assessment indicates that governance mechanisms are in place to manage human rights risks; however, ACG recognizes the importance of deepening awareness, institutionalization, and consistency of implementation to ensure these frameworks are fully embedded across locations and workforce categories.

Human Rights Risk Assessment

The assessment was followed with a structured methodology, including document reviews, site visits, management interactions, worker engagement, and perception-based surveys. This approach enabled the identification of salient human rights topics and potential risk areas across operations.

The Company intends to further mature its assessment practices over time, including periodic reassessments, enhanced risk prioritization, and integration of findings into enterprise risk management and supplier oversight processes.

Key Human Rights Themes Assessed

The assessment covered a broad range of human rights themes relevant to ACG's operations, including:

- Human rights governance and management systems
- Prohibition of child labor
- Prohibition of modern slavery (including forced, bonded, compulsory, and trafficked labor)
- Conditions relating to decent working hours
- Fair wages and benefits
- Freedom of association and collective bargaining
- Prohibition of discrimination and harassment
- Grievance redressal mechanisms
- Occupational health and safety
- Privacy and data protection

Across these areas, the assessment identified both strengths and areas requiring further strengthening.

Results of HRRRA

The HRRRA highlighted instances where respondents perceived potential risks across certain human rights themes, particularly in the context of labor practices, grievance accessibility, and consistent awareness of policies and mechanisms. At the same time, the assessment also noted several positive practices, including long employee tenure, awareness of key compliance mechanisms, regular safety initiatives, and a generally people-centric workplace culture.

The Company will progressively work on strengthening controls, closing gaps, and enhancing transparency in the coming years in 100% of its operations.

Grievance Mechanisms

ACG has established grievance and whistleblower mechanisms to enable associates and other stakeholders to raise concerns. The assessment underscores the importance of continuing to enhance awareness, trust, and confidence in these mechanisms. Strengthening accessibility, confidentiality, and non-retaliation safeguards remains a key focus area going forward.

Way Forward

ACG remains committed to respecting human rights and fostering safe, fair, and inclusive workplaces. Based on the HRRRA, the Company will:

- Continue strengthening human rights governance and internal capacity
- Enhance awareness and training across workforce categories
- Refine grievance mechanisms and feedback loops
- Integrate human rights considerations into broader risk management and sustainability strategies