

POLICY AND PROCEDURES ON PROHIBITION OF CHILD LABOUR & FORCED LABOUR AT WORKPLACE

Purpose:

To prevent employment of child labor & forced labour in all its activities & ensure it.

Stake holders Impacted

Employees and business associates.

Who is at risk?

Service providers and employees.

References:

- Child Labor (Prohibition and Regulation) Act, 1986
- ILO Convention no. 138 – Minimum age convention 1973
- Article 24 of Constitution of India (Prohibition of employment of children in factories, etc.)
- Factories act, 1948 (S. 67-70)

Definitions:

- **“Child”** means a person who has not completed his fourteenth year of age.
- **"Adolescent"** means a person who has completed his fifteenth year of age but has not completed his eighteenth year;
- **“Young person”** means a person who is either a child or an adolescent;

Policy

1. We will not employ any person below the age of eighteen years.
2. Our production processes do not require employment of any YOUNG worker. All workers are adults.
3. Proof of age is required to be provided by each and every candidate seeking employment in our factory.
4. Proper age verification is done prior to hiring.

5. No worker should be employed under force e.g labour shall not be bounded through lodging of deposits or identity papers for securing of continuing job in the company.
6. Factory will minimize employment of workers provided by service providers except for support services (Security, Housekeeping and Canteen) and will hire directly on factory rolls.

Procedures

1. Any such instances shall be reported by employees to the HR Manager.
2. Upon receiving information, the HR Manager shall be initiated enquiry for ascertaining age of worker concerned.
3. The concerned employee shall not be approached directly. The employment documents pertaining to the employee shall be rechecked by the HR Manager to verify the age based on documentation maintained.
4. If proved to be underage worker, the employment relationship shall be ended between factory and worker concerned through legally approved process.
5. Security guards shall not intimidate workers of confine their freedom.
6. Copy of proof of age shall be obtained.

Implementation

1. The policy is posted on the notice boards.
2. Staff responsible for Recruitment is trained on the policy to ensure understanding and compliance.
3. Policy is included in the induction program for new recruits.
4. Internal cross checks conducted to ensure compliance with policy.
5. Copy of proof of age document is checked against original documents to ensure authenticity. In-case no document is available; the candidate is referred to a Dental Doctor (BDS) who issues a certificate upon physical teeth examination of the candidate, in case he is an adult.
6. Documents that are accepted as proof of age are (a) School leaving certificate (b) voter Identity Card (c) driving license(d) Passport (e) Certificate from Doctor (dentist) (f) Birth Certificate (g) letter from Village headman /member of Panchayat & (h) Aadhaar Card.
7. Photocopy of all documents are filed in the employee's personal file from which his/her age can be verified at any point of time.
8. All reports of alleged violations of this policy will be addressed through procedures set forth below.
9. We will not subcontract any part of production process to prison worker.

This policy will be reviewed on yearly basis and changes if any, will be incorporated which will be communicated to all employees through verbal communication as well as through posting updates on notice boards.

Date: 24-May-2024.

Place: Noida

Reviewed By

Approved By

HR (Executive)

Corporate Head (HR & Admin)

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Adopted by the Board: 24th May 2024