

Policy Statement - 1

No Child Labour & Forced Policy

Document Code	HR-POL-01
Revision	00
Review Date	July 05, 2025
Total Pages	04
ETI COC Reference	1.1, 1.2, 4.1, 4.2, 4.3,4.4
Responsibility	HRD

Prepared By

Assistant MR

Checked By

System Coordinator

Approved By

Plant Head

CHILD LABOUR & FORCED LABOUR POLICY

Introduction:

The foundation of Proxima Steel Forge Pvt. Ltd 'No Child or Forced Labour Policy' is based on the Company's commitment to find practical, meaningful and culturally appropriate responses to support the elimination of such labour practices. It has been formulated in consideration with the child labour (prohibition & regulation) Act 1986. It thus endorses the need for appropriate initiatives to progressively eliminate these abuses.

Policy:

Proxima Steel Forge Pvt. Ltd does not employ any person below the age of eighteen years at the workplace. Proxima steel Forge Pvt. Ltd prohibits the use of forced or compulsory labour at all its units. No employee is made to work against his / her will or work as bonded / forced labor, or subject to corporal punishment or coercion of any type related to work.

Implementation:

This policy is publicly available throughout the Company and clearly communicated to all employees in a manner in which it can be understood through induction programmes, policy manuals.

The implementation of the policy is the responsibility of the Unit's HR Department and the security staff who do not permit minors to enter the factory as workers. There is Zero tolerance policy towards its breach.

Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all units and are open to verification by any authorized personnel or relevant statutory body.

The units provide an annual report on all reported, if any, incident of child or forced labour to the functional head.

No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

The organization shall prohibit the worst forms of child labour.

Upon initial hiring, our organization checks and maintains records of each employee's date of birth to ensure that there are no employees hired below the minimum regulated age.

Monitoring & Audit:

Periodic assessment is conducted. Human Resources undertake random checks of records annually.

Employment is freely chosen:

CHILD LABOUR REMEDIAL PLAN

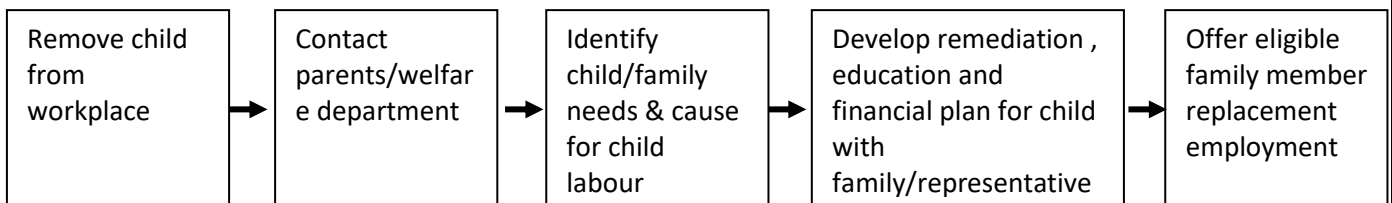
The purpose of this guideline is to set general and non-exhaustive procedures for the development and implementation of a child labour remediation plan.

A committee will be formed which includes representatives of site management, local authority

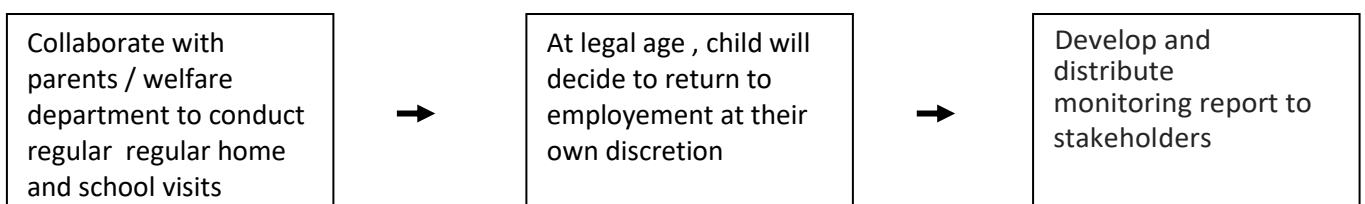
Representative, trade union or workers representative (where possible), and external experts (where

Possible) to investigate the situation and to develop an effective remediation plan.

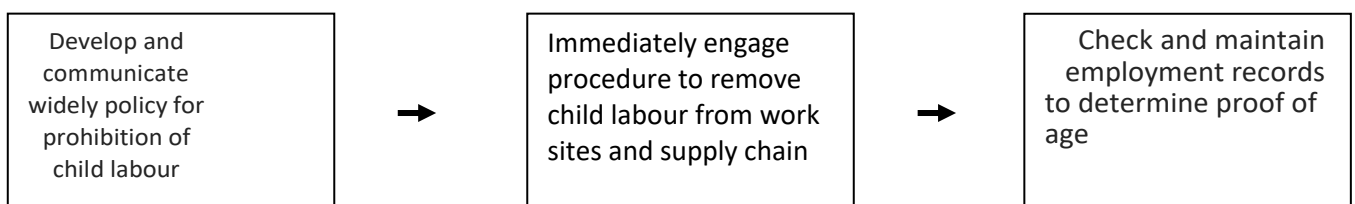
Some steps to consider:



Implementation and monitoring of the remediation plan



Developing systems and mechanisms to avoid child labour



REMEDIATION PROCEDURES

If child labour is found, it is vital to act quickly.

- If you suspect that workers in a factory may be underage, do not approach the workers directly in the first instance, but check their ID as part of a routine document check process without raising the alarm.

If document checks confirm the child is underage or if ID checks are inconclusive, you should take the following action:

- Remove the child from all work immediately. Preventing the continuation of work gives a clear message to factory managers. It also reduces the risk that managers may try to continue to use child workers under the guise of bogus 'training centers' or apprenticeship schemes'. You should err on the side of caution and assume that a young-looking worker is under-age until verifiable evidence to the contrary is provided.
- Ensure the child is in a safe place.
- Obtain contact details (ideally mobile phone number) of child and parents/guardian, and wherever possible, home address.
- Talk to the child to ensure they understand what is happening and why. Listen to them to understand their needs. Explain the possible remediation options and other measures to be put in place. Ensure they agree to participate in the remediation programme. It is important in your contact with children to be aware of situations which may present risks and manage these.
- Meet with top production site management to communicate the policies and basic positions regarding child labour and obtain their consensus on the interim arrangement for the child and their commitment for remediation.
- Arrange payment of a stipend to the child both during the exploratory phase and throughout the whole remediation programme. The stipend should be equivalent to the amount the child was earning whilst employed, or at least local minimum wage standard, whichever is higher. The stipend should be paid in weekly or monthly, rather than as a lump sum.
- Review all the personnel records at the workplace to identify whether there are any other child workers.
- Give advice on improving age verification systems to ensure that no new child worker is hired.
- These could include (but not exclusively):
 - o Policy on minimum age requirements and all workers to show proof of ID
 - o How to check the validity of ID and age
 - o Record keeping procedures

- Identification of the remediation team, including local experts. These may include trade unions, local NGOs, government resources, health professionals (for example educational psychologists), or knowledgeable individuals.

ETI COC Reference

- 1.1 There is no forced, bonded or involuntary prison labor.
- 1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

Child Labour shall not be used:

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programme which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child and child labour being defined in appendices.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provision of the relevant ILO standards.

Policy Statement -2

ANTI DISCRIMINATION POLICY

Document Code	HR-POL-02
Revision	00
Review Date	July 05, 2025
Total Pages	01
ETI COC Refrence	7.1
Responsibility	Plant Head

Prepared By

Assistant MR

Checked By

System Coordinator

Approved By

Plant Head

ANTI DISCRIMINATION POLICY

Proxima Steel Forge Pvt. Ltd. is an equal opportunity employer. In order to enable its diverse members to purpus these twin objectives, Proxima Steel Forge Pvt. Ltd seeks to provide an atmosphere free of harassment and discrimination.

We, at Proxima Steel Forge Pvt. Ltd. does not discriminate against employees due to color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, caste, birth, social background, political affiliation, union membership, race, marital status, national origin, nationality, family responsibilities & diseases in hiring and employment practices such as promotions, rewards, training, assignments, discipline and termination or any other condition that could give rise to discrimination.

All employees are treated on their merits. Employees are valued according to how well they perform their duties, and heir ability and enthusiasm to maintain the company's standards of service.

Our company discourages any form of discrimination. We believe that all employees have the right to work in an environment free from discrimination.

Discrimination underminers proper working relationships and may cause low morale, absenteeism and resignations.

"Equal Opprtunity for Everyone based on Ability Without any kind of DISCRIMINATION"

Workers are not disciplined, dismissed, harassed or otherwise discriminated against because of their Complaints against Infringements of their Rights

Remediations to prevent Discrimination

- Educate employees about discrimination through trainings and displays
- Developing business policy that prohibits discrimination
- Educate recruiters to eliminate hiring biases
- Ensure training and policies are inclusive
- Discussion in the greivance mechanism committee
- Informing and training staff and managers

No Discrimination is Practiced:

ETI COC Refrences

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Policy Statement - 03

Freedom of Association & Right to Collective Bargaining Policy

Document Code	HR-POL-03
Revision	00
Review Date	July 05, 2025
Total Pages	02
ETI COC Refrence	2.1, 2.2, 2.3, 2.4
Responsibility	Plant Head

Prepared By

Assistant MR

Checked By

System Coordinator

Approved By

Plant Head

Freedom Of Association Policy

1. Employees have the right to choose whether or not to join or be associated with a union.
 - 1.1 Employments agreements or contracts for services shall not require employees or independent contractors to:
 - a) Become or remain a member or union;
 - b) Cease to be a member of a union;
 - c) Not become a member of a union; or
 - d) Treat another person less favorably or more favorably depending on whether or not that other person is , intends to become , or ceases to be , a member of a union.
 - 1.2 Arrangements which establish closed shops, any form of compulsory unionism preference in employment are illegal. This applies to all industrial agreements, awards, orders and other industrial arrangements.
 - 1.3 Employees and prospective employees must not be subjected to any prejudice on the basis that they are, or are not, members or officials of a union. Prejudice includes appointment, dismissal, demotion, failure to promote or a detrimental change to the terms of an employee's employment conditions.
 - 1.4 To attempt to intimidate or induce an employer to act prejudicially towards an employee or prospective employee is unlawful.
 - 1.5 Any form of coercive behavior by a union or any other person on the basis of union membership or non-membership is prohibited. This Includes coercive behavior to persuade an individual to join in strike action.

Freedom of association and the right to collective bargaining are respected

ETI COC Refrence

- 1.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 1.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 1.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 1.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Policy Statement - 04

Forced Labour Policy

Document Code	HR-POL-04
Revision	00
Review Date	July 05, 2025
Total Pages	02
ETI COC Refrence	2.1, 2.2, 2.3, 2.4
Responsibility	Plant Head

Prepared By

Assistant MR

Checked By

System Coordinator

Approved By

Plant Head

1. Purpose

This policy ensures that the company prevents, identifies, and eliminates any form of forced, bonded, or involuntary labour in all operations and supply chains, in compliance with national laws and international standards (ILO Conventions, UN Guiding Principles).

2. Scope

This policy applies to:

- All employees (permanent, temporary, contractual)
- All subcontractors, suppliers, and service providers
- Visitors, trainees, and interns working on company premises

3. Policy Statement

The company strictly prohibits:

- Forced, bonded, trafficked, or involuntary labour
- Retention of original identity documents
- Withholding of wages or benefits
- Charging recruitment fees to workers
- Restricting freedom of movement or communication
- Threats, intimidation, or physical/mental coercion to make someone work
- Mandatory overtime without consent

All employment are:

- Freely chosen
- Documented with clear contracts
- In compliance with applicable labour laws

4. Recruitment Practices

- Workers must not pay any recruitment or hiring fees.
- Employment terms are explained in a language understood by workers i.e. Hindi
- No any worker's passport, ID, or personal documents will be kept by the company.
- Workers may terminate employment with reasonable notice, as per law.

5. Working Conditions

- Workers will have the right to leave the workplace after their shift (if applicable).
- No forced overtime; overtime is voluntary and compensated as per law.
- Wages are paid regularly, on time, and directly to workers.

6. Monitoring & Audits

- Regular internal audits will be conducted.
- Suppliers must sign and comply with this policy.
- Any violation can result in disciplinary action or termination of contract.

7. Reporting Mechanism

- Workers can report concerns anonymously through:
 - Suggestion box
 - HR helpline
 - Direct reporting to management
- No retaliation will be tolerated against any worker who raises a concern.

8. Responsibilities

- **Management:** Ensure implementation and monitoring of this policy.
- **HR:** Maintain records, conduct worker interviews, and ensure fair recruitment practices.
- **Suppliers:** Must follow this policy in all operations.

9. Review

This policy will be reviewed annually or when changes in law require updates.