Proxima Steel Forge Pvt. Ltd.

Policy Statement - 1

SOCIAL ACCOUNTABILITY POLICY

Document Code	**HR-POL-01**
Responsibility	**System Coordinator**

Prepared By	**Checked By**	**Approved By**
Assistant MR	System Coordinator	Plant Head

Proxima Steel Forge Pvt. Ltd.

SOCIAL ACCOUNTABILITY POLICY

Bsed on the principles of inernational human rights orms s described in International Labour Organisation (ILO) conventions. Proxim steel Forge Pvt. Ltd. Has its "Social Accountability Policy" on the following key areas of Social Accountability Standards : Chid labour, Forced labour, Discrimination, Health and Safety, Freedom of Associatio and Collective bargaining, Discrimination, Disciplinary practices, Working hours and compensation. Also provides for a soial accountability management system to demonstrate on going conformance with the standard.

1. **Child Labour:** No workers under the age of 18 are allowed to work at the premises of Proxima Steel Forge Pvt. Ltd. Workers / Employees are allowed to enter work only after the proper verification of valid documents of their age proof that they are above the age of 18 years (i.e. after Verification of original certificate of his / her age proof issue by the authorized dental surgeon / certificate of high school). No other documents will be accepted as an age proof. Supplier / Vendors working for or on behalf of Proxima Steel Forge Pvt. Ltd.

2. **Forced Labour:** Proxima Steel Forge Pvt. Ltd. Will not have any kind of bondage to its workers / employees and also not use any kind of force. All the worker / employees and also not use any kind of force. All the workers / employee can work with the organization with their free will and up to satisfaction. No force labour, including prison or debt bondage labour, no original documents of deposits or identify papers by employers or any other recruiters on behalf of Proxima Steel Forge Pvt. Ltd shall also not be allowed to use any kind of force labour.

3. **Health and Safety:** Proxima Steel Forge Pvt. Ltd provides a safe and healthy work environment, takes steps to prevent injuries, regular health and safety employee / worker training, system to detect threats to health and safety, and provides all statutory and other requirements for the safety and health of its workforce. Proxima steel Forge Pvt. Ltd Provides safe drinking water to all the workers. Special Precaution to be taken for the safety of the following :

1. Safety of the personnel
2. Safety of the machines
3. Fire Safety

Suppliers / vendors working for or on behalf of Proxim Steel Forge Pvt. Ltd shll have to take adequate precautions for the health and safety.

4. **Freedom of Association and Right to collective Bargaining:** Proxima Steel Forge Pvt. Ltd respect the right to form and join trade unions and bargain collectively, and also respect and facilitate parallel means of association and bargaining. At present Proxima Steel Forge Pvt. Ltd has the workers committee for collective bargaining. Supplier / vendors working for or on behalf of Proxima steel forge Pvt. Ltd shall respect the right to freedom of associations to their employees.

5. **Discrimination:** No Discrimination of any kind permitted at Proxima Steel Forge Pvt. Ltd based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation, or age, no sexual harassment of any kind will be allowed and employer and sexual harassment. Suppliers / vendors working for or on behalf of Proxima Steel Forge Pvt. Ltd shall not disseminate in the aforesaid manners.

6. **Discipline:** No corporal punishment, mental or physical coercion or verbal abuse is allowed / used against any worker/employee by the employer / management or b any senior / superior with his or her subordinates or any co-employee or worker. Same rules to be followed by the suppliers / vendors working for or on behalf of Proxima Steel Forge Pvt. Ltd.

7. **Working Hours:** Proxima Steel Forge Pvt. Ltd Company with the all statutory applicable laws and shall not work more than 48 hours per week (With at least one day off for every seven days period. Sunday is observed as the weekly off (Except the security guard). Security guards are allowed minimum one day (24 hours) weekly off on completion of six days shift duties of 08 hours on each day. The supplier / vendors working for or on behalf of Proxima Steel Forge Pvt. Ltd shall have to follow similar kinds of rules.

8. **Compensation:** wages and other compensation paid by Proxima Steel Forge Pvt. Ltd to its employees for a standard work performed as per the parameters of all statuary requirements to meet the legal and SCI standards and be sufficient to meet the basic need of workers and their families; all workers are to be paid above the minimum wages as notified by the Appropriate Govt. from time to time. No disciplinary deduction on any nature is allowed by Proxima Steel Forge Pvt. Ltd. Supplier / vendors working for or on behalf of Proxima Steel Forge Pvt.Ltd shall have to pay at least the minimum wages to their workers as notified by Appropriate Govt. from time to time.

9. **Incentives and Awards:** Proxima Steel Forge Pvt. Ltd. Provides incentives and awards to its employees and workers based on the performance metrics are mostly tangible to business objectives and measurable and have an incentives and awards policy.

10. **Management system:** Proxima Steel Pvt. Ltd. Management must maintain and facilities the social accountability standards. Management must be willing to go beyond ongoing simple social compliance standards and continual improvement to integrate the standard into their management systems and practices.

Proxima Steel Forge Pvt. Ltd.

Policy Statement - 2

No Child Labour & Forced Policy

Document Code	**HR-POL-02**
Responsibility	**HRD**

Prepared By	**Checked By**	**Approved By**
Assistant MR	System Coordinator	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 cosideration 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 theuse 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, inluding age, are maintained at all units and are open to verification b any authorized personnel or relevant statutory body.

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

Monitoring & Audit:

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

Proxima Steel Forge Pvt. Ltd.

Employement 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:

Remove child from workplace → Contact parents/welfare department → Identify child/family needs & cause for child labour → Develop remediation , education and financial plan for child with family/representative → Offer eligible family member replacement employment

Implementation and monitoring of the remediation plan

Collaborate with parents / welfare department to conduct regular regular home and school visits → At legal age , child will decide to return to employement at their own discretion → Develop and distribute monitoring report to stakeholders

Developing systems and mechanisms to avoid child labour

Develop and communicate widely policy for prohibition of child labour → Immediately engage procedure to remove child labour from work sites and supply chain → Check and maintain employment records to determine proof of age

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):
  - Policy on minimum age requirements and all workers to show proof of ID
  - How to check the validity of ID and age
  - 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 Refrence

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.

Proxima Steel Forge Pvt. Ltd.

Policy Statement -3

ANTI DISCRIMINATION POLICY

Document Code	**HR-POL-03**
Responsibility	**Plant Head**

Prepared By	**Checked By**	**Approved By**
Assistant MR	System Coordinator	Plant Head

Proxima Steel Forge Pvt. Ltd.

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 discrimintion.

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

"Equal Opprtuinity 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.

Proxima Steel Forge Pvt. Ltd.

Policy Statement - 04

Freedom of Association & Right to Collective Bargaining Policy

Document Code	**HR-POL-04**
Responsibility	**Plant Head**

Prepared By	**Checked By**	**Approved By**
Assistant MR	System Coordinator	Plant Head

Proxima Steel Forge Pvt. Ltd.

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.