

Policy Statement - 1

SOCIAL ACCOUNTABILITY POLICY

Document Code	HR-POL-01
Responsibility	System Coordinator

Prepared By
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Checked By
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Approved By
Plant Head

SOCIAL ACCOUNTABILITY POLICY

Based on the principles of international human rights norms described in International Labour Organisation (ILO) conventions. Proxima Steel Forge Pvt. Ltd. Has its "Social Accountability Policy" on the following key areas of Social Accountability Standards : Child labour, Forced labour, Discrimination, Health and Safety, Freedom of Association and Collective bargaining, Discrimination, Disciplinary practices, Working hours and compensation. Also provides for a social accountability management system to demonstrate 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 Proxima Steel Forge Pvt. Ltd shall 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 by 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 statutory 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.

Policy Statement - 2

No Child Labour & Forced Policy

Document Code	HR-POL-02
Responsibility	HRD

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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.

Monitoring & Audit:

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

Employment is freely chosen:

CHILD LABOUR REMEDIAL PLAN

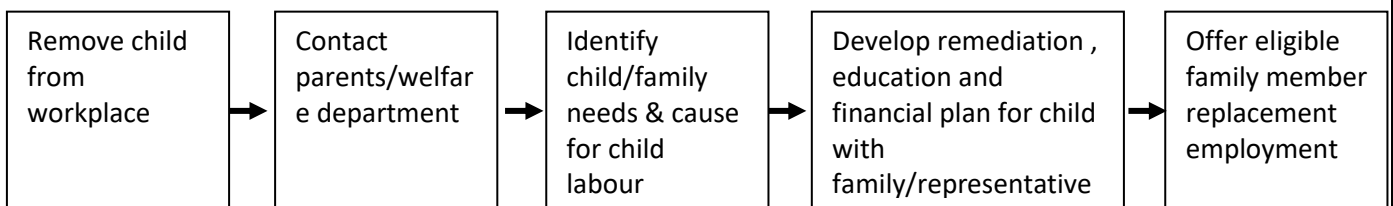
The purpose of this guideline is to set general and non-exhaustive procedures for the development and implementation of a child labour remediation plan.

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

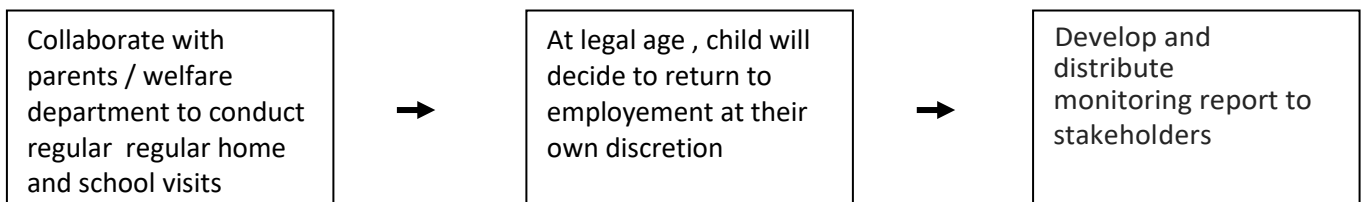
Representative, trade union or workers representative (where possible), and external experts (where

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

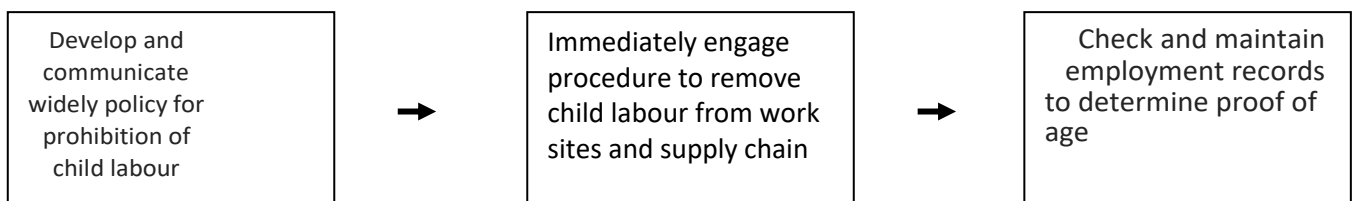
Some steps to consider:



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 -3

ANTI DISCRIMINATION POLICY

Document Code	HR-POL-03
Responsibility	Plant Head

Prepared By
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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 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.

Policy Statement – 4

INTERNAL COMPLAINT COMMITTEE (ICC) POLICY

Document Code	HR-POL-04
Responsibility	HRD

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INTERNAL COMPLAINT COMMITTEE (ICC) POLICY

1. Introduction

It is a core goal principle of Proxima steel Forge Pvt Ltd to ensure gender equality and gender justice through all of Proxima Steel Forge Pvt Ltd's interventions and practices. In keeping with this principle, it is important to ensure an organizational climate free from discrimination and complaint with a particular focus on Internal Complaint. Any type of harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will be discouraged by this organization. Further, any retaliation against an individual who has complained about harassment or retaliation against individuals for cooperating with an investigation of a complaint is similarly discouraged. To achieve this goal, the conduct that is described as "ICC" in this policy will be strongly discouraged and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered among employees.

Proxima Steel Forge Pvt. Ltd will also take all the appropriate steps necessary to protect staff from retaliation.

Such Steps include:

- Action to stop retaliatory behavior
- Providing required security measures
- Counseling help to Complainant and Accused

Proxima Steel Forge Pvt. Ltd takes allegations of sexual harassment seriously and will respond promptly to complaints of ICC and where it is determined that such inappropriate conduct has occurred, prompt and appropriate corrective action as a necessary, including disciplinary action, will be taken. While this policy sets forth our goals of promoting a workplace that is free of ICC, the Policy is not discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of ICC.

Explanation1: Creating a "Hostile work environment" means

(a) Creating a workplace where ICC may go unheeded, where despite complaints on action is taken, where there is nexus between accused / aggressor & higher management and where complainant is placed under fear, disadvantage or threat of victimization.

(b) It will also mean Retaliation which includes:

- Marginalizing someone in the workplace with regard to his / her roles and responsibilities.
- Socially ostracizing

- Intimidating someone physically, psychologically, emotionally or someone close to or related to the victim
- Spreading canard

(c) And any other behavior that may commonly be construed as retaliatory

Explanation 2: “ICC” in Proxima Steel Forge Pvt. Ltd and its associates shall also mean:-

- (a) Direct or Implied requests by any staff for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment constitutes sexual harassment.
- (b) Other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating or humiliating to staff may also constitute sexual harassment.

Explanation 4: In addition the following are some exmples of conduit which if unwelcome, may constitute harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances – whether they involve physical touching or not
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one’s sex life, comment on an individual’s body, comment about an Individual’s sexual activity, deficiencies or prowess
- Displaying sexually suggestive objects, pictures, cartoons, displaying body parts
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments
- Inquiries into one’s sexual experiences
- Discussion of one’s sexual activities
- Abuse of authority (Quid Pro Quo) –demand by a person in authority, for sexual favors I exchange for work related benefits (e.g. a wage increase, a promotion, training opportunity, a transfer or the job itself)
- The behavior that creates an environment that is intimidating, hostile or offensive for members of one sex and thus interferes with a person’s ability to work.

2. Preventive Action

1. Circulation of Proxima Steel Forge Pvt. Ltd Policy in English / Hindi / Field offices on Harassment to all persons employed y or in an way acting in connection with the work and / or functioning of Proxima steel Forge Pvt. Ltd.
2. Ensuring that Harassment as an issue is raised and discussed at Proxima Steel Forge Pvt. Ltd. Meetings from time to time
3. Widely publicize that the SH is Crime & will be discouraged. [Incise when they get appointed by other employer’s.

3. Intenal Complaint Committee

1. ICC will be elected by the Company

2. ICC needs to have a strong commitment to women's right and gender equity. They should also understand that complaints of IC are of a sensitive nature and confidentiality of all parties concerned, especially the complainant and accused has to be respected.

3. ICC will be responsible for taking steps to ensure that cases of harassment in Proxima Steel Forge Pvt. Ltd are brought to the notice of higher authorities / legal cells.

4. ICC are empowered to deal with informal complaints of Harassment

5. ICC has to inform all new staff of IC Policy.

4. Procedure of dealing with complaints of Sexual Harassment

1. If any staff Proxima Steel Forge Pvt. Ltd believes that he or she has been subjected to Harassment such person (ICC member who may have assisted the complainant or those who have otherwise observed harassment at Proxima Steel Forge Pvt. Ltd) shall have the option to file complaint with the ICC. This may be done in writing or orally. Even if it is done verbally initially, it is always preferable to have the complaint in writing.
2. A complaint may be filled by contacting any one of the ICC Members.
3. Informal complaints of IC may be made to the committee within unit.
4. All formal complaints sexual harassment to be referred to Mr. Rishi Raj Sharma by the ICC unit head. Unit's heads or any other staff are not empowered to panelized staff or worker.
5. The ICC has to investigate and submitted a report to Mr. Rishi Raj Sharma within 6 weeks. The Mr. Rishi Raj Sharma will have to decide on recommendations within 2 weeks receiving report from the ICC.

While respecting the autonomy of the Mr. Rishi Raj Sharma of organisation, Proxima steel Forge Pvt. Ltd. Will have to play a facilitating role within the Mr. Rishi Raj Sharma by-

- ❖ Creating an Harassment free climate
- ❖ Helping the ICC actions
- ❖ Ensuring that complaints of IC are heard and investigated

It is necessary when complaint and accused are from 2 or more different organisation there should be an ICC member with representatives from at least one such other organisation.

5. Third party Harassment

Where IC occurs as a result of an act or omission by any third party or outsider, Proxima Steel Forge Pvt. Ltd will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

6. Management Obligations

1. Management of Proxima Steel Forge Pvt. Ltd. shall provide all necessary assistance for the purpose of ensuring full, effective and promote implementation of this policy. It shall further be bound by the decisions of the Ash Policy and shall implement the same expeditiously.
2. The Support to be provided to IC Policy includes:
 - (i) Secretarial and administrative support for training and other preventive actions.
 - (ii) Helping to setup ICC
 - (iii) Secretarial support during IC enquiries.
 - (iv) Adequate financial resources for all activates
3. The responsibility for preventive activities (regarding IC)rest with the management of Proxima Steel Forge Pvt. Ltd.
4. The responsibility of taking prompt action on ICC

7. Sexual Harassment and Proxima steel forge Pvt. Ltd. Mr. Rishi Raj Sharma

Proxima Steel Forge Pvt. Ltd is responsible for ensurig that its Mr. Rishi Raj Sharma have a commitment to as IC free working atmosphere within the Organisation.

Policy Statement - 5

ANTI BRIBERY / CORRUPTION POLICY

Document Code	HR-POL-05
Responsibility	Plant Head

Prepared By
Assistant MR

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System Coordinator

Approved By
Plant Head

ANTI BRIBERY / CORRUPTION POLICY

Proxima Steel Forge Pvt Ltd. Values are integrity and transparency in business. In support of these principles, company has developed this policy for countering corruption and bribery.

Corruption is understood as the misuse of entrusted power for personal gain.

Bribery is understood as the offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or breach of trust, in the conduct of the enterprise's business.

1. Scope:

The policy covers:

All the employees of Proxima Steel Forge Pvt. Ltd.

All our suppliers and contractors.

All outside Authorities / Auditors / Inspectors coming for checking / auditing / inspecting.

2. Objective

The purpose of this policy is to:

- (i) Set out business Practices for countering corruption and bribery.
- (ii) Give guide lines

To our employees while dealing with contractors, suppliers and outside Inspecting / Auditing agencies.

To our contractors and suppliers while dealing with our employees.

3. Commitment

Proxima steel Forge Pvt. Ltd. has 'ZERO-TOLERANCE' towards corruption and bribery. The company is committed to serving its clients with absolute honesty and integrity.

The company and its employees commit to this policy and to the pursuit of integrity and transparency.

The responsibility for the policy implementation, monitoring and questions regarding policy and principles rests with the Management.

4. Operational Guide-Lines

a) For All Employees

Be honest and trustworthy. Make sure that your behavior complies with this policy and other rules of the company.

Use the company resources in the best interest of the company and avoid its misuse. Make a clear distinction between the interest of the company and private interest and avoid possible conflicts.

Do not pay or accept any bribe / gift / other service which conflicts with this principle.

If you find anyone trying to violate this principle, immediately report the matter to the management.

b) For Managers

Every Manager has an individual obligation to ensure that any interaction with public officials complying with all relevant laws and regulations, as well as this policy.

It is the responsibility of every Manager to communicate this programme and ensure that all employee and external parties working on behalf of PROXIMA STEEL FORGE PVT. LTD., within their area of responsibility, understand and comply with the objectives and guide-lines of this policy.

c) Contractors and suppliers

Proxima Steel Forge Pvt. Ltd. Conducts its procurement / employment practices in a fair and transparent manner and takes due care when evaluating major prospective contractors and suppliers. A copy of our 'ANTI CORRUPTION / BRIBBERY POLICY' has already been given to you. We reserve the right to terminate your services in the event of you or your agent offering bribes to our employees or in any other way violates this policy.

Should a PROXIMA STEEL FORGE PVT. LTD. Employees violates this policy and solicits payment / gift/ others services, please report the matter immediately to the Management.

PROXIMA STEEL FORGE PVT. LTD. Will avoid dealing with prospective contractors and suppliers who do not have a clean image in this regard.

5. Communication and Training

The company will ensure that all its employees, contractors and suppliers are informed about and understand this programme. Each employee will receive relevant training and new employees will be briefed as a part of the welcome orientation.

Confidentiality and Reward System

1. Confidentiality of Reports

The Company is committed to protecting the confidentiality of all reports, disclosures, complaints, and investigations **relating** to suspected bribery, corruption, fraud, or other violations of this Policy.

- Employees, contractors, suppliers, customers, and other stakeholders may report concerns through the Company's designated reporting channels.
- Reports may be made confidentially and, where permitted by applicable law and Company procedures, anonymously.
- The identity of a person making a report will be kept confidential and disclosed only to those who have a legitimate need to know for the purpose of assessing, investigating, or addressing the matter, or where disclosure is required by law.
- All information obtained during an investigation will be handled securely and sensitively.
- The Company prohibits any form of retaliation, intimidation, harassment, discrimination, or adverse employment action against a person who raises a concern or participates in an investigation in good faith.
- A person who makes a report in good faith will not be subject to disciplinary action merely because the concern is subsequently determined to be unsubstantiated.
- Knowingly making a false, malicious, or deliberately misleading report may result in appropriate disciplinary action.

2. Reward and Recognition System

The Company encourages employees and other stakeholders to report suspected bribery or corruption and may provide appropriate recognition or rewards for information that materially contributes to the prevention, detection, investigation, or recovery of losses arising from misconduct.

- A reward may be considered where a report is made in good faith and provides credible information that leads to a substantiated finding of bribery or corruption, recovery of Company assets, or prevention of significant financial or reputational loss.
- Rewards are discretionary and will be determined by the Company based on the significance, reliability, and impact of the information provided.
- The Company may establish different reward levels or forms of recognition depending on the nature and seriousness of the matter.
- No reward will be provided for knowingly false, malicious, fabricated, or misleading reports.
- Where legally permissible, a person may request that any reward or recognition be provided without publicly disclosing their identity.
- The reward system does not limit or replace any rights or protections available to whistleblowers under applicable law.
- Decisions concerning rewards will be reviewed and approved by an authorized management committee or designated compliance function to promote consistency, fairness, and avoidance of conflicts of interest.

3. Non-Retaliation

No employee or stakeholder will be penalized, disadvantaged, dismissed, threatened, or otherwise subjected to retaliation for raising a genuine concern about bribery or corruption, refusing to participate in an improper payment or activity, or cooperating with an investigation.

The Company will take appropriate corrective action where retaliation is identified.

4. Governance

The Compliance Officer or other designated authority shall oversee the operation of the confidentiality and reward mechanisms, maintain appropriate records, monitor reported concerns, and periodically review the effectiveness of these arrangements.

Nothing in this section shall prevent the Company from complying with applicable laws, regulatory requirements, contractual obligations, or lawful directions from competent authorities.

Policy Statement – 6

Workplace Harrassment Voilance Prevention & Zero Abuseament Policy

Document Code	HR-POL-06
Responsibility	Plant Head

Prepared By
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Approved By
Plant Head

WORKPLACE HARRASSMENT,VIOLENCE **PREVENTION & ZERO ABUSEMENT POLICY**

A. INTRODUCTION

The mission and values of Proxima steel Forge Pvt. Ltd set standards of respect for the individual. Employees have expressed a will to reaffirm these values and behaviors. Explicitly through our actions and conduct. There is no place for aggression or violence in our work environment, and Proxima steel Forge Pvt. Ltd considers the safety of our employees and visitors pramount.

Proxima steel Forge Pvt. Ltd. Has a zero tolerance approach to workplace violence. Zero tolerance means that every reportedactioof abusive / ggreesive or threatening behavior will be tracked and resolved based on the individual facts. Individual cases may require different resolutions. Although measures will be put in place to assist parties in conflict resolution, where appropriate, disciplinary action will be taken, up to and including termination of employment, revocation of privileges or termination of contract agreements.

DECLARATION

It is our firm expection:

- That everyone including employees, contractors and visitors to Proxima steel Forge Pvt. Ltd. (from here on PROXIMA STEEL FORGE PVT. LTD.) Will be treated and will treat others with dignity and respect.
- That by individual efforts and through the consistent application of (this) Policy and Procedure, Proxima steel Forge Pvt. Ltd. Will have a safe and healthy environment.

B.POLICY

Proxima steel Forge Pvt. Ltd. Iscommitted to reating and maintaining an environment that is healty and Where the dignity and worth of all employees is respected.

Accordingly:

- Proxima steel Forge Pvt. Ltd. Discourages workplace violence.
- Proxima Steel Forge Pvt. Ltd. Discourages abusive or aggressive behavior of any kind.
- Proxima Steel Forge Pvt. Ltd. Will take all reasonable steps to prevent and eliminate abusive and aggressive behavior.
- Proxima steel Forge Pvt. Ltd. Will deal effectively with each and every incident of abuse and aggression that threatens the safety of anyone at Proxima Steel Forge Pvt. Ltd.
- In the event of a substantiated claim of abusive or aggressive behavior, Proxima Steel Forge Pvt. Ltd. Will implement corrective measures where appropriate, up to and including termination of employment.

C. SCOPE

This Policy applies to all Proxima Steel Forge Pvt. Ltd employees, contract employees, visitors, and to any Person working on behalf of Proxima Steel Forge Pvt. Ltd.

D. PURPOSE

The purpose of the Policy is:

- To promote a work environment where by every individual feels free from any kind of threatening or abusive behavior.
- To link and add credence to our Code of Conduct and enhance the standard of respectful behavior to all members of Proxima Steel Forge Pvt. Ltd.
- To create practical links to already existing policies and procedures.
- To provide employees with effective tools and strategies to be used with in Proxima Steel Forge Pvt. Ltd. To prevent and respond to incidents of abuse and aggression in the workplace.
- To make available information regarding ways to identify those who potentially may be abusive or aggressive, especially with regard to the signals that may predict an incident of abusive and aggressive behavior and therefore prevent these from occurring.
- To implement and exceed provision made for in all existing and applicable legislation regarding the creation of safe environment for employees.
- Raise awareness at Proxima Steel Forge Pvt. Ltd. Regarding the prevention of abusive and aggressive behavior at work.
- Establish a comprehensive reporting and tracking mechanism to document and investigate incident that threaten the safety of our staff and wellness of our environment.
- Educate and / or train everyone who works at Proxima Steel Forge Pvt. Ltd in the prevention and elimination of abusive and aggressive behavior.
- Educate visitors to Proxima Steel Forge Pvt. Ltd. About our "Violence free work environment.
- Provide the necessary physical and emotional support to those who perceive they have been victims of aggression / violence at work.

E. DEFINITIONS

1. Workplace violence

Workplace violence is any abusive or aggressive behaviour that can include "physical assault" on a person or on property, "behaviour considered to be threatening", or "abuse in a verbal manner" that occurs in a work-related setting. It is important to note that in many circumstances there is a progression in the way that abusive behaviour can escalate to aggression (and even to violence). In our desire to eliminate abusive and aggressive behaviour from our Proxima Steel Forge Pvt. Ltd. Workplace, we are careful to acknowledge that not every single act of abuse will lead to an act of violence, but that the possibility of progression from one to another exists if left unchallenged. That progression can be from the verbal to the actual physical, notwithstanding that there are occasions when physical abuse may come suddenly and spontaneously.

Proxima Steel Forge Pvt. Ltd. Regards abusive and aggressive behaviour as the following:

There is abusive and aggressive behaviour when an individual or group of individuals compromises the physical and psychological safety of an individual or group of individuals by

their extreme behaviour that strays from expected behaviour at work, whether intentionally or unintentionally.

Examples of workplace violence that any reasonable person ought to be aware of can include, but is not limited to, the following:

- a) Verbal abuse and threatening behavior (also known as psychological abuse) Shouting
Condescending language Swearing Bullying or any other behavior meant to intimidate, belittle or demean another mobbing, by a group of individuals towards one or more members of Proxima Steel Forge Pvt. Ltd. Making racial slurs or comments Obscene or threatening phone calls at work or home. Any behavior meant to offend, humiliate or embarrass veiled threats or open threats Gestures with the hands or other parts of the body that indicate harm Stalking Display or use of any kind weapon, including gun, rods, knife, stick etc. or any other object that could be interpreted as being dangerous. Leering or string
- b) Physical abuse and threatening behavior, Slapping, Shoving and pushing, Pinching, Hair Pulling, Punching, Hitting, Throwing and object at a person, Kicking, Scratching, Tugging at clothes, Biting, Shooting and stabbing, Suicide / attempted suicide & Mobbing.
- c) Damage to employee's personal property or to Proxima Steel Forge Pvt. Ltd. Property throwing of any object Vandalism to employee's vehicles deliberately kicking or punching fixtures and fittings Banging or throwing equipment Interfering with Proxima Steel Forge Pvt. Ltd. Vehicles or causing damage to employee vehicles at work.

2. Workplace

Workplace is defined as : any location where any employee of Proxima Steel Forge Pvt. Ltd. Employees:

- . PROXIMA STEEL FORGE PVT LTD Premises
- . Parking Facilities
- . Any location an employee is required to be during the course of their employment duties

3. Employees

Employees include all employees , permanent , temporary and casual . Employees may be located in any department , division or site of . PROXIMA STEEL FORGE PVT LTD, and may be serving the organization in any capacity.

F. ROLES AND RESPONSIBILITIES

1. Leadership (includes anyone who has the responsibility to supervise other individuals working at PROXIMA STEEL FORGE PVT LTD) :

Those who are in positions of responsibility for the health , safety and well being of staff of PROXIMA STEEL FORGE PVT LTD must demonstrate in their attitudes and behavior the highest regard for the respect and dignity of all under their charge . Therefore , all supervisors / coordinators must:

. Model the substance and intent of the PROXIMA STEEL FORGE PVT LTD Policy and Procedure for Workplace

Violence Prevention , and demonstrate in their words and actions as leaders of PROXIMA STEEL FORGE PVT LTD , Commitment to intolerance of abuse and aggression of any kind within the Organization ;

- . Work collaboratively with others involved who share joint responsibility to resolve issues with regard to abusive , aggressive or violent behavior at the PROXIMA STEEL FORGE PVT LTD ;
- . Take all reports of threats of abusive / aggressive behavior seriously ;
- . Be able to identify the early warning signs of the potentially problematic situation or individual and use preventative measures to avoid escalation of abusive and aggressive behavior ;
- . After receiving a report , meet with the two individuals involved , within three business days , and attempt to come to a satisfactory resolution for all parties
- . Introduce , manage and maintain written reporting procedures , documentation processes , tracking mechanisms as required by this policy so that PROXIMA STEEL FORGE PVT LTD tracks and measures the impact to the organization of both the policy and breaches of the policy .

2. Visitors to the PROXIMA STEEL FORGE PVT LTD

Visitors to the PROXIMA STEEL FORGE PVT LTD can expect to be treated with dignity and respect at all times . They should not be expected to find an abusive or aggressive environment when they come to use the service of PROXIMA STEEL FORGE PVT LTD , or are visiting the organization for any reason . It is also the expectation that visitors will treat the PROXIMA STEEL FORGE PVT LTD staff with the same respect and dignity , and that they do not exercise abusive or aggressive behavior towards members of the PROXIMA STEEL FORGE PVT LTD staff . To this end , PROXIMA STEEL FORGE PVT LTD is committed to the following :

- Developing Communication for visitors outlining acceptable conduct that is expected for all people within the confines of PROXIMA STEEL FORGE PVT LTD ;
- Signage at PROXIMA STEEL FORGE PVT LTD that sets out explicitly that PROXIMA STEEL FORGE PVT LTD is a violence – free work environment ;
- Ensuring with this communication that all visitors are made aware of their rights to seek recourse for perceived breaches of this policy ;
- Informing with this communication of the consequences for them for breaches of this policy .

3. Employees

Every individual employee contributes to the creation of a safe and healthy work environment by demonstrating respectful and appropriate conduct at work . All employees must accept as a personal responsibility their own role in eliminating the use of abuse and aggression in the day-to-day activities of their own work unit . Therefore , employees must :

- Understand and follow this policy and procedure ;
- Uphold the code of conduct and its Principles ;
- Promote respectful interactions at work ;
- Reduce workplace violence through challenging unacceptable behavior ;
- Complete the report and submit to the appropriate individual for any conduct that causes an individual concern; this is also expected from the employee who witnesses an incident and is not the direct victim. Silence in the face of abusive behavior does not allow for the promotion of a safer environment, and so every employee who witnesses abusive behavior is expected to report such behavior. No employee who in good faith registers a complaint of abuse or reports an incident of aggressive behavior will suffer any recrimination for doing so .However, false and malicious accusations of abusive or aggressive behavior will face consequential corrective and

remedial action. All complaints and reports of abusive or aggressive behavior will be treated seriously, will be investigated thoroughly and fairly, and will be dealt with accordingly.

G. CRISIS RESPONSE

If an incident of violence or aggression occurs that is of an immediate or threatening nature, any individual who feels he/she is in immediate danger should raise an alarm and call the local emergency numbers 100 (police), 101 (Fire), 102 (ambulance).

No harsh or inhumane treatment is allowed

ETI COC Reference

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Policy Statement – 7

OCCUPATIONAL HEALTH & SAFETY POLICY

Document Code	HR-POL-07
Responsibility	Health & Safety Officer

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

OCCUPATIONAL HEALTH & SAFETY POLICY

Proxima Steel Forge Pvt Ltd is Committed to :

- Providing a healthy and safe work environment for its employees
- Preventing occupational illness and injury in all of its workplaces
- Providing regular health and safety training and education

POLICY

- It is the duty of each employee to report to the principal or supervisor, as soon as possible, any hazardous conditions, injury, accident or illness related to the workplace.
- Wherever required, the company will provide personal protective equipment. The employees will be required to use safety equipment, clothing devices and materials for personal protection.
- PROXIMA STEEL FORGE PVT. LTD. recognizes the employee's duty to identify hazards and supports and encourages employees to play an active role in identifying hazards and to offer suggestions or ideas to improve the health and safety program.

Occupational Health & safety plan

Proxima Steel Forge Pvt. Ltd. will maintain a current occupational health and safety plan as part of implementing an occupational health & safety management system. The Activities and procedures of this program will be updated continually and monitored for their effectiveness to ensure continual improvement in the occupational health & safety performance. The plan will relate to all aspects of occupational health and safety including:

- Work design , workplace design , safe working systems , work methods statements and work practices ;
- Changes to work methods and practices , including those associated with technological change ;
- Emergency procedures including drills;
- Occupational Health & Safety training and education;
- Occupational Health & Safety Information dissemination:
- Provision of occupational Health & Safety equipment (including PPE) , Services and facilities ;
- Occupational Health & Safety inspections and audits;
- Safety rules and penalties;
- Reporting , recording and investigation of incidents , injuries and illness;
- Consultation with employees.

Consultation

Consultation will be undertaken to ensure that all employees are provided with information on matters that may impact on their health and safety in the workplace.

Communication

Communication will be undertaken to ensure that all employees are provided with information on matters that may impact on their health and safety in the workplace.

Implementation

- For employees a notice will be circulated indicating the release of the occupational Health and Safety and will indicate where it can read.
- Information on the occupational Health and Safety policy will be incorporated in all corporate induction programs.

RESPONSIBILITY / ACCOUNTABILITY

Mr. Rishi Raj Sharma

Mr. Rishi Raj Sharma must ensure that the OHS policy plan , plan and procedures are effectively implemented in their areas of control . They must also support managers and supervisors and hold them accountable for their specific responsibility

Managers

Managers must be ensure that the occupational Health & Safety policy , plan and procedures are effectively implemented in their areas of control . They must also support supervisors and hold them accountable for their specific responsibility.

To achieve this , managers will

- Liaise and consult with supervisors.
- Ensure occupational Health & Safety policies and procedures are operating effectively;
- Ensure risks are identified , assessed & controlled;
- Maintain and update policies , procedures and work method statements as appropriate;
- Develop , Maintain and update workplace procedures;
- Include occupational Health & safety as part of workplace induction;
- Monitor occupational Health & Safety records;
- Consult with the occupational Health & Safety representatives when issues arise;
- Provide their senior manager with information as required ;
- Include Occupational Health & Safety activities , results of inspections , incident reports and statistics on the agendas of management and staff meetings;
- Explain their occupational Health & Safety rights and responsibilities to volunteers and people undertaking work experience programs.

Supervisors

Each supervisor is responsible, and will be held accountable, for taking all practical measures to ensure that the workplace is safe and without risks to health.

To achieve this, Supervisors will:

- Liaise with managers;
- Manage Occupational Health & Safety in their area of responsibility on a daily basis ;
- Conduct workplace inspections;
- Ensure Occupational Health & Safety policies and procedures are being implemented ;
- Ensure Risks are identified , assessed & controlled
- Take actions as appropriate to solve issues;
- Consult with other supervisors & employees;
- Make recommendations regarding improvements to the occupational Health & Safety Program;
- Provide managers with information and statistics as required e.g. potential hazards ; action taken ; and costs (where appropriate);

Employees

Employees are required to cooperate with the occupational Health & Safety policy, plan and program to ensure their own health and safety and that of others in the workplace.

To achieve this , employees will:

- Take reasonable care for the health & safety of others at work ;
- Report hazards and incidents to supervisors ;
- Cooperate with occupational Health & Safety Procedures.

Occupational Health & Safety Representatives

The Occupational Health & Safety Representatives Will:

- Assist Management in ensuring the occupational Health & Safety Policy and procedures are being implemented;
- Provide information regarding requirements , occupational Health & Safety issues and advice as required to assist senior managers , managers , supervisors and staff in carrying out their roles and ensuring consistency throughout the workplace;
- Make recommendations as appropriate ;
- Assist in collecting and analyzing occupational Health & Safety statistics reporting to senior managers ;
- Assist in incident investigations where required;

Purchasing Department

The Purchasing Department will:

- Develop and implement purchasing procedures which insures Occupational Health & Safety is accounted for in the selection of all products and or services;
- Liaise and consult with management on occupational Health & Safety aspects of product purchasing ;
- Maintain appropriate records

OHS Manager

The Function of the Occupational Health & Safety Manager & representatives is to :

- Keep under review the measures taken to ensure Occupational Health & Safety for people at work ;
- Investigate any issue which may be a risk to health and safety at work ;
- Participate in the consultative process for decisions on occupational Health & safety issues.

The Occupational Health & Safety manager & representatives may:

- Assist Management and supervisors in identifying potential and existing hazards;
- Assist in developing policies and procedures;
- Assist in regular Occupational Health & Safety inspections ;
- Make recommendations to supervisors and/or appropriate manager;
- Review performance indicators;
- Promote Occupational Health & Safety in the workplace.

Contractors

Contractors Will:

- Comply with occupational Health & Safety policy & relevant policies (e.g. Environmental Policy etc.) to ensure the health , safety and welfare of employees ; Contractor's employees and subcontractors.
- Comply with Proxima Steel Forge Pvt. Ltd. occupational Health & Safety policies, procedures and guidelines.

To achieve this, they will:

Cooperate with occupational Health & Safety Procedures;
Report hazards and incidents to their supervisor;
Take reasonable care for the health & safety of others at work.

HEALTH & SAFETY RISK ASSESSMENT & SOLUTIONS CHECK LIST

Risk of injury at work

- All machines are equipped with standard safety functions.
- All machine operators are trained
- All passages are clear
- Cartons weigh 20 Kilos or less at all times
- Workers working on hazardous process wear adequate PPE's.
- Smoking is not permitted in the premises
- All writing is covered
- Mock fire drills are conducted periodically.
- Firefighting equipment's are installed & easily identified.
- Fire alarms in all departments
- Fire evacuation plan is displayed in each floor / department.

- First aid kits are provided on each floor for safety of the workers.
- There are trained personnel for first aid

ETI Refereances

Working Conditions are safe and hygienic:

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing so far as is reasonably practicable, the cause of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

Policy Statement -8

Food & Drink Policy

Document Code	HR-POL-08
Responsibility	Health & Safety Officer

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Food & Drink Consumption Policy

General Principles :

Under the health and safety at work order , employees have duties to take reasonable care for the health and safety of themselves and other and to cooperate with the employer to comply with requirements of the health , safety & environment at work order.

The Management of health and safety at work :

This food policy seeks to guarantee all employees that right to work in clean workplace .

Common Areas:

Food and drinks consumption is not permitted in the following areas :

- Corridors
- Stairways
- Meeting Rooms
- Toilets
- Reception Areas
- Entrances
- Parking
- Other than lunch / Canteen area

Work Areas:

Food/Drink consumption is not permitted in any work area. This applies to all offices and work areas, whether occupied by one person, or shared by two or more.

Implementation and enforcement of the policy:

- Managers will be responsible for the promotion and maintenance of the policy by their staff.
- Employees should inform the appropriate manager of anyone who fails to comply with the policy.
- Visitors not adhering to the policy will be asked to comply or leave the premises.
- Breaches of this policy will be subject to the normal disciplinary procedures.

Policy Statement -9

No Smoking Policy

Document Code	HR-POL-09
Responsibility	Health & Safety Officer

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

General Principles :

Under the health and safety at work order , employees have duties to take reasonable care for the health and safety of themselves and other and to cooperate with the employer to comply with the requirements of the health , safety & Environment at work order.

The Management of Health and Safety at work :

This Smoking policy seeks to guarantee all employees that right to work in smock free environment i.e tobaccosmoke . Etc. Premises will be designated smoke - free with adequate signage to inform all employees and visitors of the smoke -free status of the building.

Common Areas :

Smoking is not permitted in the following areas :

- Corridors
- Stairways
- Canteen
- Meeting Rooms
- Toilets
- Reception Areas
- Entrances
- Parking

Work Areas:

Smoking is not permitted in any work area. This applies to all offices and work areas, whether occupied by one person, or shared by two or more.

Vehicles:

Smoking is not permitted in company vehicles. The policy of “No Smoking” will apply to the parking areas.

Implementation and enforcement of the policy:

- Managers will be responsible for the promotion and maintenance of the policy by their staff.
- Employees should inform the appropriate manager of anyone who fails to comply with the policy.
- Visitors not adhering to the policy will be asked to comply or leave the premises.
- No smoking board are displayed in all common , working and office areas
- Breaches of this policy will be subject to the normal disciplinary procedures.

Policy Statement -10

Working Hours, Overtime & Living Wages Policy

Document Code	HR-POL-10
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Working Hours, Overtime & living Wages Policy

With respect to the applicable local laws of the land , ' The policy on working hours and overtime is as follows :

- The timing of a regular working day will be as follows :

In Time - 08:30 A.M

Out Time - 05:00 P.M

- The total working hours are 8 hours in a day.
- The Duration of breaks in a regular working day will be as follows :

Lunch Time - 12:30 To 13:00 PM

Tea Time - Two Times a Day 15 Min. each
(Approx. 10:00 to 10:15 AM, 15:00 to 15:15 PM)

- Weekly Off - One Day, Sunday in a week is given weekly off (General Shift)

Overtime is paid doubled as per current salary structure in accordance with the requirement of current Punjab Factories Rule.

Living Wages are paid:

ETI COC Refrence

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages

before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Working hours are not excessive:

ETI COC Refrence

6.1 Working hours must comply with national laws, collective agreements, nad the provision of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labor standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the foloowing: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtimeshall always be compensated at a premium rate, which is recommeded to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not excedd 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- This is allowed by national law;

- This is allowed by collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
- Appropriate safeguards are taken to protect the workers; health and safety;
- The employer can demonstrate the exceptional circumstances apply such as unexpected production peak. Accidents or emergencies;

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 days period.

Policy Statement - 11

Freedom of Association & Right to Collective Bargaining Policy

Document Code	HR-POL-11
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 Reference

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 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 - 12

Employment / Hiring Policy

Document Code	HR-POL-12
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Employment / Hiring Policy

We Recognize that human resources development and welfare is of most importance for success and all the employees are considered as part of PROXIMA STEEL FORGE PVT LTD family . Our Employment policy is to ensure that:

- Selection is strictly on merit without any consideration for caste, creed, gender, religion, race, color, provincial or national origin, disability, sexual orientation, political opinion and other similar factors.
- Child labour is not allowed
- Working hours and other service conditions are designed for better health, environment and social conditions of employees and are in accordance with the prevailing applicable laws of the country.
- Human Resources Development through further education and training is encouraged.

Strength of Work-force.

- Work-force recruited shall be within the permissible limit as specified in the factory license.

Age & Eligibility

- In no circumstances any person below 18 years of age shall be employed.
- The age shall be verified from :
 - Birth Certificate of Municipality or Govt. Body.
 - 10TH Certificate of a Govt. recognized board showing the age of the person
 - Ration Card / Election I.D. Card showing a clear photograph of the person
 - Medical CERTIFICATE – The certification must be provided on the basis of a Radiological report. This can be X-Ray of teeth, elbow, knee, etc. Which is specified by the Doctor. The Certificate must be issued on Doctor's letter-head and should have doctor's Registrations Number written on it. The photo of the person who has been certified should be attached and should have Doctor's seal and signature. This certificate must be accompanied by X-ray report.
- No person who has been convicted for a criminal offense or is mentally or physically unfit to perform the required job would be employed.
- Forced or Prison or Bonded labour will not be employed.
- The examination to ensure physical fitness will be arranged at the time of employment by the company.

Proxima ensures non-discrimination in recruitment processes as well as throughout the entire employment cycle including promotion, training, benefits and termination.

Regular employment is provided:

ETI COC Reference

8.1 To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice,

8.2 Obligations to employees under labor or social security laws and regulation arising from the regular employment relationship shall not be avoided through the user of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligation be avoided through the excessive use of fixed-term contracts of employment.

Policy Statement - 13

DISCIPLINARY ACTION POLICY

Document Code	HR-POL-13
Responsibility	Management

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Disciplinary Action & Termination Policy

1. Workman responsibility

No worker in the Factory

- a) Shall willfully interfere with or misuse any appliance, convenience or other thing provided in the factory for the purpose of securing the health, safety or welfare of the workmen.
- b) Shall willfully and without reasonable cause do anything likely to endanger himself or others, and
- c) Shall willfully neglect to make use of any appliance or other thing provided in the factory for the purposes of securing the health or safety of the workers

2. Management responsibility

Responsibility for the maintenance of discipline in the factory initially rests with the person to whom the workman reports. The Management expects everyone to maintain reasonable standards of conduct, reliability, efficiency and competence. Employees are entitled to know standards are expected of them and to be given a fair hearing before any disciplinary decision is taken against them.

Workmen should make sure that they know and understand the disciplinary procedure.

3. Misconduct

From time to time, disciplinary matters may arise which are not considered to be acts of gross misconduct but nevertheless call for disciplinary action. In such cases, disciplinary action should be understood to include, depending entirely upon the relevant circumstances, the following possible measures:

Verbal warning

Defacing company property

Lack of respect for others

Refusal to cooperate

This list is not comprehensive

4. Gross Misconduct

There are certain matters which are absolutely forbidden and which may lead to workman's summary dismissal. Some examples of such gross misconduct are:

Theft or unauthorized possession of Company property or any other form of dishonesty, including any abuse of the "clocking" procedure.

Actual or threatened physical violence or verbal abuse

Deliberate disregard of safety regulations

Refusing to obey a lawful instruction

Defrauding the company

Immoral behavior

Malicious damage or misuse of Company's or Customer's property

Being under the influence of illegal drugs or alcohol

This list is not comprehensive

In case of gross misconduct, the Company reserves the right to dismiss an employee without notice or payment in lieu of notice, where investigation by the company, and consideration of any mitigating circumstances, (During which the employee maybe suspended without pay) the Company is satisfied that the employee concerned has committed or intended to commit an act of gross misconduct.

Termination Policy

It is our company policy to ensure that employee terminations are handled in a professional manner with minimal disruption to ongoing work functions.

There are two types of termination:-

Voluntary

Death

a) Voluntary Terminations - Voluntary termination of employment occurs when an employee informs his or her supervisor of employee's resignation, or termination is deemed to have occurred when an employee is absent from work for more than three months.

b) Deceased Employees - A termination due to the death of an employee will be made effective as of the date of death.

Final pay - An employee who resigns or is discharged will be paid through the last day of work, less outstanding Loans, advances or other agreements the employee may have with the company.

Final pay due, upon the death of an employee, will be paid to the deceased employee's estate.

(D.2) Termination Procedure

Below guidelines is followed in a facility at the time of termination of the employees.

Procedure for Voluntary Termination - Employees is expected to provide a minimum of one month' notice of their intention to separate from the company in order to allow a reasonable amount of time to transfer ongoing workloads. It is expected that written notification will be

provided to the employee's line manager.

Upon receipt of an employee's resignation, the line manager must notify Human Resources (HR) by sending a copy of the resignation letter to HR and the same communicated to Plant Head and security annotated if necessary, with pertinent information (i.e. employee's reason for leaving, last day of work, etc)

The HR Administrator will coordinate the employee's out-processing. This process includes:

Returning all company property (i.e., keys, ID cards, parking passes, computer / laptop, access password stop / block, finger access delete etc. & this company returning procedure will be applicable for all type of separating Employee.) Facility access is also restricted after the last date of working. Review of benefits status.

The completed summary should be returned to HR where it will be maintained in the employee's personnel file.

Employees who possess a security clearance are required to check out and debrief with the Security officer no later than their last day of employment. If any worker is misplacing the card then the entry of the card must reported to the security guards to prevent unauthorized used and also the same number card needs to be allocated to that particular workers moreover the same.

Procedure For Deceased Employees - Upon receiving notification of the death of an employee, the supervisor must notify the benefits administrator immediately.

The Benefits Administrator will process all appropriate beneficiary payments from the various benefits plans.

FINAL PAY - It is the responsibility of the employee's supervisor to ensure that the payroll office receives the terminating employee's timecard in sufficient time to process the final paycheck.

SECURITY MEASURES

After all the formalities are completed of the employee termination, HR Personnel will inform the security officers for the same, in the form of "Terminated Employees List" which further has to be displayed in the security Gate so that no unauthorized employees can enter in the factory premises.

Policy Statement - 14

Environment Policy

Document Code	HR-POL-14
Responsibility	System Coordinator

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

ENVIRONMENT POLICY

At Proxima steel forge pvt ltd we are recognize the strong links between organization's working and the environment . Our aim is not only to reduce further damage to the environment in surroundings but also to make real improvements that can be enjoyed by those who live in , work in and visit the organization . We see four major ways in which Proxima Steel Forge Pvt Ltd can work to meet the objectives of the environment strategy by actively improving the environment in surroundings :

- Promoting sustainable and healthy means of working
- Reducing the negative environmental impacts of the organization's activities.
- Improving the local environment of the organization
- Assessing the environmental and health impacts of organization's activities

We are taking forward initiatives in all these areas.

- Air quality actions
- Energy actions
- Open spaces & biodiversity actions
- Waste actions
- Ambient noise actions

Overall Objectives

To promote a development that builds on sustainable production and consumption and cuts the link between economic growth and environmental stress. In addition, there will be Nordic proposals for developing and promoting the use of economic controls; for preventing large quantities of waste and emissions of greenhouse gases; for increased recycling of waste; for better knowledge of the environment among the population and in businesses; for better product information; and for promoting green markets and sustainable and cleaner technology.

Policy Statement - 15

Environment Action Plan

Document Code	HR-POL-15
Responsibility	System Coordinator

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

ENVIRONMENT ACTION PLAN

Proxima Steel Forge Pvt Ltd endeavors to incorporate sustainable development the utilization of resources to meet the needs of the present generation without compromising the ability of future generations to meet their needs into all stages of planning , design and decision –making. Proxima Steel forge Pvt Ltd is conscious of its impact on the environment , seen through the organization’s reduced consumption of resources such as water , energy , and paper. The environmental action plan is a step towards creating a more sustainable premises . The environmental action plan was developed by Proxima Steel Forge Pvt Ltd Management .

Target is set for continuous reduction in environmental impact.

Environmental action plan

1. **Air Quality** – Improving air quality by reducing emissions, promoting cleaner fuels, implementing pollution management measures, Two Roots co. has got NOC from Pollution control committee.
2. **Energy**- reducing greenhouse gas emissions and introducing cost effective, energy efficient measures, cleaner technology and the use of renewable energy. Proxima Steel Forge Pvt. Ltd. has installed a power controlling distribution system which includes :
 - **APFC (Automatic Power Factor Correction Plan)** to save the frequency loss of energy ,
 - **Voltage Stabilizer** for voltage controlling and
 - **Main energy distribution panel** for controlling distribution system.
3. **Ambient Noise** – Reducing noise on the worst affected areas of the organization which are as follows:
DG Set
Using low noise machines, generator sets and vehicles.
4. **Open space and biodiversity policy** – promoting responsible use of open spaces and waterways and planting trees in open areas where ever feasible.
5. **Waste** – Encouraging movement of waste by proper way and proper Management of waste and water and investigating and updating procedures to reduce, re-use and recycle it. Proxima Steel Forge Pvt Ltd has an established waste management policy, according to that waste is disposed of with due care whenever it cannot be reused in production.
6. **Health** – Promoting healthier means of working, reducing pollutants that contribute to ill health, improving employee safety and access to health services and assessing the health impacts of overall working system. Proxima Steel Forge Pvt. Ltd. Environmental action plan is the first step in coordinating and managing all our actions that impact on environment. It is part of a wide – ranging program for the development and implementation of environment policy, involving all Proxima Steel Forge Pvt. Ltd. corporate office and workplace. The plan should be seen in the context of the organization’s environmental strategy, and will contribute to the development of environment.

The environment in which people live has a major effect on their health. The Plan therefore examines the main environmental and health impacts of Proxima Steel Forge Pvt. Ltd. activities and sets out specific actions to deal with these impacts.

These actions cover six areas:

- Air Quality
- Energy
- Ambient Noise
- Open Space and biodiversity
- Waste
- Health

Setting targets in each. The plan both reflects and will inform Proxima Steel Forge Pvt Ltd business planning process and adopts the same, though many of the actions are ongoing or may take longer to complete. It will be reviewed annually.

Proxima Steel Forge Pvt. Ltd. will carry out its business in a responsible way and aim to ensure that the social, economic and environmental strands of the concept of sustainable development are an integral part of the decision-making processes across the organization.

In line with Proxima steel Forge Pvt. Ltd. Strategy, Organization will aim: 'to reducing the health and environmental damage by Proxima Steel Forge Pvt. Ltd. activities. However Organization's policy gives a clear lead in committing the organization to the principle of sustainable development.

Sustainable Development has been defined as 'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'.

To achieve this, economic development must go hand-in-hand with environmental improvement and social inclusion. That is why Proxima Steel Forge Pvt. Ltd. has produced an environment action plan and occupational Health & Safety policy to sit alongside Proxima steel Forge Pvt Ltd Business plan in aiming to meet the sustainable development agenda.

Environment Impacts& Plan to Reduce

Aspect	Activity/Product/Service	Impact	How Can it be reduced?
Energy use- including electricity, gas & other fuels	Power of computer systems , heat , light , machines etc.	Global Warming .use of natural resources	Control activity when systems not in use .(switch off light at night / when not in use
Buisness travel – Road / rail/ Air	Road – Field Work like sourcing Rail – out of town production site visits . Air – Meeting in other countries	Global warming .use of natural resources	Use Efficient Vehicles , review fuel types . use rail for travel . use video conferencing.
Transport	Use third party carrier for delivery of goods to warehouse etc	Global warming use of natural resources.	Review fuel types . use global carriers with defined delivery infrastructure.
Solid Waste	Inbound packaging material accompanying goods for suppliers office waste catalogues etc	Use of natural resources increase landfill	Recycle
water	Staff welfare & comfort – Drinking water & Toiler water. Watering Plants.	Use of natural resources	Fit controllers I water taps . rain water harvestings
Fire	Unwanted , Uncontrolled incident	Pollution to air & land. Waste of water resources	Fire procedures & extinguishing systems . Good house keeping & maintenance programs.
Fossil Fuels (Diesel etc)	Fuels stored on site for generators to provide back up power for generators.	Contamination of land and water resources	Ensure no seepage into soil & it is properly stored.
Packaging waste	Deliver to customer in good condition.	Use of nateral resouces . increase waste landfill.	Use recycled products . Re-use in house.
Catalogue Production	The various products catalogues are the main route to market for the distribution businesses	Use of natural resources. Global warming	Use farmed paper. Use recycled material . Encourage use of e-solutions , e.g.web , cd etc.
Emissions to air	Emergency back-up generators	Pollution to air	Fuel selection . efficient fuel use. Prohibit indiscriminate use.

Policy Statement - 16

Quality Policy & Objectives

Document Code	HR-POL-16
Responsibility	Quality Coordinator

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

QUALITY POLICY

Satisfied customers are the ultimate goal of our organization . This is the basic philosophy which decides the growth of our organization and its leadership and its leadership in the maket.

Keeping our “Quality System” in tune with the requirements of ever demanding and highly quality conscious customers , it is of prime importance to implement our quality policy stated as under :

WE , AT PROXIMA STEEL FORGE PVT. LIMITED ARE COMMITED TO MANUFACTURE PRODUCTS WHICH SATISFY OUR CONSUMERS FOR THEIR INTENDED PURPOSE BY PROVIDING A STANDARD OF HIGHEST PERFORMANCE BY CONTINUALLY IMPROVING EFFECTIVENESS OF THE QUALITY MANAGEMENT SYSTEM.

- Formulation and adoption of a quality system calls for a whole hearted participation of each and every one of us to correct ourselves, whenever the necessity calls for any such corrective measures.
- While faithful implementation of the approved procedures is ensured at all levels, any suggestion towards the scope for improvement is and will be appreciated and considered.

QUALITY OBJECTIVES

6. Targeting towards achievement of zero percent rework.
7. Targeting Towards zero defect in final product, thereby, minimizing customer complaints.
8. Continuous improvement, cost reduction and development of defects free products.
9. On time delivery.
10. Customer satisfaction through implementation of quality policy.

Policy Statement - 17

Sharp Tools Policy

Document Code	HR-POL-17
Responsibility	Plant Head

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

BROKEN NEEDLES & SHARP TOOLS POLICY

(A) NEEDLES AND BLADES

1. Operators are not allowed to keep any extra needle or blade with them – used or new.
2. Operators are not permitted to regrind / replace the worn-out/broken needles/ blades. The same will be done by the department fitter / mechanic under the supervision of department supervisors.
3. After replacement, old needle / blades must be returned to the stores where they will be kept in safe custody.
4. If the needle / blade get broken during operation, every effort should be made to collect all the broken fragments using a magnet, if necessary. All the broken parts must be deposited in the stores.
5. Packing section to ensure that it is free of any broken needle / sharp –edged tool fragment. In case it fails the test, destroy the piece in the presence of Production manager.
6. In case all the broken parts are not found, the worker should report the matter to the supervisor. The supervisor will re-check the area with the concerned worker. If the broken parts are still not traceable , the supervisor should give the following declaration on a separate sheet :
7. The copy of the declaration should be attached in the broken needle/blade register and then only the new needle /blade should be issued to the operator.

(B) SCISSORS, CUTTERS, ETC.

1. The tools will be issued to the operators in the morning and they are to be returned to the departmental store-keeper at the end of the shift.
2. Re-grinding, wherever required, is to be done by the department fitter/ mechanic only.
3. From hygienic point of view, it is essential that operators use their own tools only. They should, therefore, engrave their names on the tools or use any other method for easy identification of their tools.

Policy Statement - 18

Anti-Drug Policy

Document Code	HR-POL-18
Responsibility	Health & Safety Officer

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

नशीले पदार्थों विरोधी नीति

और उनके सुपरवाइजर यह सुनिश्चित करे कि पैकटों के अन्दर फैक्ट्री द्वारा निर्मित टूलों के अलावा कोई अन्य वस्तु की पैकिंग न होने पाये । पूर्ण रूप से सुरक्षित और बंद पैकटों को सुपरवाइजर और सुरक्षा कर्मियों के सामने सीलबंद किया जाये ।

जिन ट्रकों या मालवाहकों द्वारा इन सीलबंद पैकटों को बाहर भेजा जाना है उनकी संपूर्ण तलाशी सुरक्षा कर्मियों द्वारा ली जाये ।

सीलबंद पैकटों को ही सुपरवाइजर और सुरक्षा कर्मियों के देख रेख में ट्रकों या सील वाहकों में लादा व लोड किया जाये ।

पैकिंग के संपूर्ण प्रक्रिया के दौरान पैकिंग कर्मियों को यदि कोई अवांछनीय वस्तुओं के होने की शंका हो तो वो इसकी तत्काल सूचना सुरक्षा कर्मियों और महाप्रबंधक को दें ।

नशीली दवाइयों के दुरुपयोग और राष्ट्रीय विद्रोहिक गतिविधियों के रोकथाम के लिए आप पैकिंग कर्मियों से सजनता, सूझ बूझ और सहयोग अति आवश्यक और अपेक्षित है।

Policy Statement - 19

GRIEVANCE HANDLING POLICY

Document Code	HR-POL-19
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

GRIEVANCE HANDLING POLICY & PROCEDURE

It is preferable for the grievance to be satisfactorily resolved as close to the individual and their line manager as possible . It is understood however that this is not always possible and that a formal procedure is required to ensure the swift and fair resolution of matters which aggrieve the company's employees.

Policy Statement : Proxima is committed to good communications and the efficient and fair resolution of grievances and complaints . The company acknowledges the right of staff/worker to make complaints and to have their complaints handled by the company . The company understands that complainants can provide useful feedback and will endeavor to resolve genuine complaints in a positive and constructive manner.

Scope :The Policy is applicable to all employees within the factory.

Departments Affected : All departments

Responsibilities :

Primary- Human Resources

Secondary – All Respective HOD'S

Procedure:

The Grievance procedure is intended as the tool by which an employee may formally have a grievance , regarding any condition of their employment , heard by the company.

Time lines have been fixed to ensure that grievances are dealt with quickly , however these may be extended if it is agreed upon by both parties.

This procedure is not intended to deal with :

- Dismissal or disciplinary matters which are dealt with in separate procedure
- Disputes , which are of a collective nature and which are dealt with in a separate procedure

Stage 1

- An employee who has a grievance, should raise the matter with his reporting supervisor immediately either verbally or in writing in complaint register available at packing section and grinding section. If the matter itself concerns the employee's immediate (supervisor) Manager, then the grievance should be taken to their functional Head or Department head.

- If the department Head or manager is unable to resolve the matter at that time then a formal written complaint should be submitted. The manager should then respond within 2 Working days (i.e. the manager's normal working days) to the grievance unless an extended period of time is agreed upon by both parties. The response will give a full written explanation of the manager decision and who to appeal to if still aggrieved

Stage 2

- In most instances the company would expect the managers decision to be final and for the matter to come to a close. However , in some circumstances the employee may remain aggrieved and can appeal against the decision of the manager concerned
- The appeal, grievance committee, must be made within seven working days of the original response to the employee's grievance. The appeal must be in writing and contain copies of the original Complaint. The grievance committee along with HR will attempt to resolve the Grievance. A formal response and full explanation will be given in writing , as will the name of the person to whom they can appeal if still aggrieved , within 3 days

Stage3

- If the employee remains aggrieved there will be a final level of appeal to the Director. This appeal must be made in writing, enclosing copies of the earlier complaint and replies given, to the director within two working days of receipt of the stage 2 response. The Director will arrange and hear the appeal with another member of the leadership team and respond formally with a full explanation within 7 working days
- There is no further right of appeal. Where however both parties agree that there would be some merit in referring the matter to a third party for advice , conciliation or arbitration , arrangements will then be made to find a mutually acceptable third party

Using Mediation

- An independent third party or mediator can sometimes help resolve grievance issues before it is necessary to invoke the formal procedure. Mediation is a voluntary process where the mediator helps two or more people in dispute to attempt to reach an agreement. Any agreement comes from those in dispute, not from the mediator. The mediator is not there to judge, to say one person is right and the other wrong, or to tell those involved in the mediation what they should do. The mediator is in charge of the process of seeking to resolve the problem but not the outcome.
- The company will seek to identify employees who can act as internal mediators in addition to their day jobs
- There are no hard -and-fast rules for when mediation is appropriate but it can be used :
 - For conflict involving colleagues of a similar job or grade , or between a line Manager and their staff

Proxima Steel Forge Pvt. Ltd.

- At any stage in the conflict as long as any ongoing formal procedures are put in abeyance
- To rebuild relationships after a formal dispute has been resolved
- To address a range of issues , including relationship breakdown , personality clashes , communication problems and bullying and harassment
- Mediation is not part of the company's formal grievance procedure. However if both the parties agree to mediation, then the grievance procedure can be suspended in an attempt to resolve the grievance through that route. If mediation is not successful, then the grievance procedure can be re-commenced.

Policy Statement - 20

ADVANCE POLICY

Document Code	HR-POL-20
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Advance Policy

Purpose

This policy provides guidelines and direction regarding the payment of advances .

SCOPE : HR Department (Salary)

Policy :

1. An employee can request for advance in every month.
2. The advance requested should not be more than one third of his salary.
3. He should not be on leave / absent more than the specified by the in charge.
4. In case the leave / absent are more than the specified the decision of giving the advance can be taken by the salary dept. in discussion with the section in charge.
5. The advance will be paid on the 25th of every month.
6. The advance will be deducted in the upcoming due salary.
7. In case any employee wants to relax the deduction in the upcoming month the request can be filled to the plant head through section in charge.

Policy Statement - 21

HOUSE-KEEPING POLICY

Document Code	HR-POL-21
Responsibility	H&S

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Housekeeping Policy

- Place all waste and scrap (such as domestic trash, scrap metal, oily rags, cutting clothes, etc.) in containers. Empty all containers on a consistent basis; do not let them over fill.
- Segregation and controlled disposal of waste.
- Identify and provide waste receptacles throughout the work area. Waste is kept in a segregated area as required.

Access Routes In and Out of Work Sites

- Check with the foreman or supervisor about access routes in and out of buildings, work areas, process areas,
Onto and off of roofs.
- The following areas must be kept clean:
 - Routes leading to all work locations must be well lit and free of obstacles.
 - Walkway and stairway areas must be kept clear.
 - Areas around ladders must be kept clear.
 - Emergency exits must be identified. Routes to emergency exits must be kept clear and free of obstacles.
 - Routes and access points to excavations, roofs, process areas, and buildings must be kept clear.
 - Areas where emergency equipment is stored must be kept clear.
 - Areas that house electrical systems must be kept clear.

Responsibilities:

Management

- Ensure that all housekeeping tools are provided to workers (bins, garbage containers, brooms, dust suppression, etc...)
- Ensure that waste removal is taking place in the workplace and regular waste pick up is being done.
- When required, coordinate external waste disposal means.

Supervisor

- Ensure that the housekeeping standard is being observed by all workers and sub-contractors.
- Enforce the housekeeping policy for all Proxima Steel Forge Pvt. Ltd. workers on site and report sub-contractor non-compliance to management.
- Schedule housekeeping as part of a job or task to allow workers to properly clean areas as they go.
- Coordinate with management to ensure that site waste disposal is occurring

Workers

- Comply with the housekeeping standard
- Communicate any housekeeping concerns to their supervisor

Preamble (Introduction):

Effective housekeeping can eliminate some workplace hazards and help get a job done safely and Properly. Poor housekeeping can frequently contribute to accidents by hiding hazards that can cause injuries.

In order for housekeeping to be successful housekeeping should be conducted throughout the day on a continuous as need basis rather than all at the end of the work day.

Waste material and debris shall be removed to a disposal area and reusable material shall be removed to a storage area as often as is necessary to prevent a hazardous condition arising and, in any event, at least once daily.

Scope:

This policy applies to all Proxima Steel Forge Pvt. Ltd. employees and sub-contractors (when applicable).

Policy:

As part of the Proxima Steel Forge Pvt.

Ltd.'s stance on health and safety in the workplace, housekeeping will be conducted as part of normal work duties. A clean workplace eliminates many hazards and thus Mitigates some injuries and incidents.

Housekeeping Standards:

- A daily job site cleanup program in place.
- Individual clean-up duties for all workers.
- Materials piled, stacked, or otherwise stored in such a manner as to prevent tipping and collapsing.
- Work areas and walkways kept tidy, well-lit, and ventilated.
- Clean up as you go – do not wait until the end of the shift.
- Stairways, ladders, and access ways are to be clear of material at all times.
- Always keep the area clear around emergency equipment and electrical panels.
- Place cables, and cords in an organized manner to avoid tripping hazards.
- Keep tools and working materials in proper containers.
- Keep small items in boxes or bins.
- Keep the floor clear of tools.
- Limit work table clutter only to items that are part of the job at hand.

Trash, Waste, and Scrap Disposal

Enforcement:

All employees and sub-contractors found in non-compliance of this policy may be subject to Proxima Steel Forge Pvt. Ltd. discipline policy.

Policy Statement - 22

RECRUITMENT & SELECTION **POLICY**

Document Code	HR-POL-22
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Recruitment & Selection Policy

Objective

The success and adaptability of Proxima depends upon the recruitment of employees who are flexible, adaptable and committed to the success of the organization.

This Recruitment and selection policy provides guidelines and policies to assist in hiring the best people on merit through a process that is free from bias and discrimination

SCOPE: This Policy is applicable to the whole organization.

Responsibility: HR Department

Recruitment Authorization Procedure

Authorization

- The recruitment process for any position within Proxima will be initiated on raising a hiring request with approval of Director.
- The concerned manager will send the detail mail with approvals to HR
- New positions will only be activated upon approval from the Managing Director
- All authorization procedure detailed below must be completed prior to the commencement on any recruitment procedure:
- Prior to the employment of any employee the approval process must be completed
- The employment of all individuals for positions within Proxima Steel Forge Pvt Ltd must be authorized by the Managing Director.

Procedure

- The concerned functional head will send a hiring request along with position description
- The functional head will provide the human Resource team with approval and instruct commencement of Recruitment
- The Human Resource (HR) team will control and verify that the correct authorization is obtained . When all is in order , they shall commence the recruitment process

Recruitment Guidelines

Equal Opportunity hiring

- The company does not make a distinction between people of different backgrounds, religion or race.
- All positions are open to members of both the genders and no discrimination will be made except on account of hazardous functions or on account of potential dangers physically to the employee on account of their gender. For example women may not be allowed to be hired to work on extended outdoor duties in certain regions.
- Asking for HIV test before and after hiring is strictly prohibited.

Selection and joining formalities: The HR will inform the interviewee upon his / her selection and provide an appointment letter describing the terms and conditions of job.

- The following documents are to be submitted to the HR on joining the organization
 1. Photocopy of birth certificate
 2. Experience certificate from the previous employer
 3. 2 Passport size photograph
 4. Photocopy of qualification certificates.
- The new employee will get the employee code No. from the HR department.
- The HR department will help the new employee to get registered on biometric finger punching attendance system to get familiarize with the punching process for daily attendance.

Induction & orientation

During induction the new employee is introduced to various departments, departmental head's and their work process

Policy Statement - 23

Ladder Policy

Document Code	HR-POL-23
Responsibility	Health & Safety Officer

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Working At Height Using Ladder

PURPOSE

To Establish a procedure to control safe working at height using ladders.

Scope : All over the plant (Wherever required)

Policy:

1. Use portable ladders for flights up to 4 M only
2. Provide fixed ladders for flights above 4 M.
3. Place the ladder at an angel of 75 degrees (approx.) from the horizontal
4. Extend ladder at least 1 M above the top landing
5. Secure top and bottom of the ladder firmly to prevent displacement.
6. Ensure that the width of the ladder is not less than 300 mm and distance between rungs is not more than 300 mm.
7. Provide landings of minimum size 600x600 mm at intervals not more than 6 M for fixed ladders. Check the ladders daily for any defects.
8. Ensure that the areas around base and top of the ladder are clear. Getting on and off the ladder is more hazardous than using it. Use a mudsill if the ladder is to rest on soft, loose or rough soil.
9. Do not use ladders of conducting material near power lines.
10. Stand no higher than the fourth rung from the top for carrying out any job standing on a ladder.
11. Always face the ladder while climbing up and down
12. Maintain three point contact while climbing up and down a ladder i.e .two hands and one feet or two feet and one hand on the ladder at all the times . Avoid climbing up or down a ladder while carrying anything in hands. Lift Tools, Equipment and material with a rope.

Policy Statement - 24

Compensation Policy

Document Code	HR-POL-24
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Compensation Policy

Our company ensures that the wages paid for a standard month always meet at the legal standard; Time worked above 48 hours and on Sunday is paid at double time. All time worked on a holiday is paid at double time in addition to receiving holiday pay. All employees are provided with a monthly pay record explaining deductions taken; hours worked, and pay computations withheld. The Company will never utilize payroll deductions for disciplinary purposes. Our company ensures that all wages paid are in a manner that is convenient and safe for all employees.

Accidents are compensated with ESI.

Policy Statement - 25

Leave Policy

Document Code	HR-POL-25
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

LEAVE POLICY

Earned leaves/ Privilege leaves: These are the leaves which are earned in the previous year and enjoyed in the preceding years. These are also known as privilege leave this can be carry forward for the quantum up to the total of three years and vary from state to state as per the shop & establishment act. These are cashable on basic salary to the employee. Normally in advance at least 15 days. This can be clubbed with sick leave if sick leave is not balance with the employee.

Casual Leave: These leave are granted for certain unforeseen situation or were you are require to go for one or two days leaves. In case of casual leave normally company's strict maximum to 3 days in a month. In this case either the person has to take the permission in advance or has to be regulated on joining. This leave is normally never clubbed with Privilege leave, but it can be clubbed with sick leave if there is is no sick leave balance. Again quantum var from state to state as per shop & establishment act, normally this leave is not cashable or never carried forward. These days to attract people or to reduce absenteeism at the end of the year the balance Casual leave in converted to PL in the leave account.

Leave without pay: If person do have any leave to his balance and the situation warrants him to take the leave, the leave is granted by the Company as loss of pay or which may be adjusted against the future leave or as a special case the special paid leave based on the person contribution to the Company at management discretion.

Compensatory off: These leave are granted if the person come on work during the holidays, normally compensated as leave to be taken or as a cashable option.

Policy Statement - 26

Shipment Release Policy

Document Code	HR-POL-23
Responsibility	Quality HOD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

SHIPMENT RELEASE POLICY

We are committed to supply the good quality products with correct quantity with all security measures to our customers. The company will strictly follow the shipment release procedure as given under:

Authority to release the shipment: Factory Manager and Quality Manager

Procedure:

The authority will ensure that the following actions have been completed.

Quality Checks

**Inline Inspection
Midline Inspection
Final Inspection**

Third party inspection approval (If required)

Export Documents

Shipment Challan

Container check with photographs / Vehicle check

If any shipment is on hold beyond 90 days mold inspection will be verified for finished/packed products stored in warehouse and then it will be released.

Note: The declaration needs to be made that final packed products has been duly inspected and verified. This is to be signed by the authority people mentioned above before actual dispatch of goods.

Authorized Signature

Declaration

This is to certify that we have checked for the mold in the packed materials which were lying in the warehouse for more that 90 days that there were no any evidences of molds in it.The materials are ready to be dispatched without any mold quality issues.

Details are as follows-

Work Order No. _____

PO No. _____

Inspected on Dated :- _____

Inspection By

Reviewed By

Approved By

Qa Inspector

Quality HOD

Factory Manager

Policy Statement - 27

Young Worker Policy

Document Code	HR-POL-27
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Young Worker Policy

Person in the range of 14-18 years of age referred to as young worker. Young worker when needs to be employed must follow below requirements.

- Cannot carry out hazardous tasks.
- This includes working with chemicals, heavy machinery or mechanics, confined spaces, at height, extreme temperatures, in dusty areas, around loud noises or heavy loads.
- Cannot be employed at night.
- Cannot work overtime.
- Must be provided healthcare checks as required by law.

Remediation

Age Under 18's Proxima will seek to develop a responsible solution that is in the best interest of child and to mitigate the risk to the child. Consultations should be conducted with the child and their guardians to establish what they want or need. Any child under 15 found working should be removed from the work, however they should not be dismissed or have their wage discontinued.

Special protection to young workers should be provided against conditions of work which are prejudicial to their health, safety, morals and development

Written assurance of re-employment opportunity on attaining the legal working age is developed. The child should return to education without financial disadvantage.

Due to nature of job in Proxima Proxima do not employ young employees.

Proxima ensures that young people do not work at night and are protected against conditions of work which are prejudicial to their health, safety, morals and development.

Young workers' working hours do not prejudice:

- a) Their attendance at school,
- b) Their participation in vocational orientation approved by the competent authority,
- c) Their capacity to benefit from training or instruction programmes.
- d) Proxima ensures that young workers have access to effective grievance mechanisms.
- e) Proxima ensures that young workers are properly trained on Occupational Health and Safety and have access to related training programmes.
- f) The auditee has a good overview of all young workers engaged in its production site.

Policy Statement - 28

Human Rights Policy

Document Code	HR-POL-28
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

HUMAN RIGHT'S POLICY

PROXIMA STEEL FORGE PVT. LTD. recognizes the valuable role that business can play in the longer-term protection of human rights. Company is committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognized frameworks including the BSCI Social Standard and its associated international instruments.

Our commitment entails makes (necessary arrangements) respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing and minimizing potential adverse impacts through due diligence and management of issues, and resolving grievances from affected stakeholders effectively.

PROXIMA STEEL FORGE PVT. LTD. endeavor's to achieve our commitment by:

- Maintaining positive legal compliance with applicable constitutional and regulatory human rights requirements and conforming to our Sustainable Business Framework;
- Undertaking an iterative, due diligence process, the focus of which is identifying, assessing and managing potential risks and impacts;
- Aligning our existing policies, processes and activities with our commitment to respect human rights, including those that apply to labour practices, engagement with indigenous peoples; land acquisition, supply chain, and security management;
- Promoting awareness of the human rights with employees at various levels of our operations through training and communication;
- Engaging with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities;
- Valuing diversity, equal opportunity and the need to consider the rights of vulnerable groups such as indigenous peoples, women, migrant workers and other minorities;
- Prohibiting all forms of harmful child labour, forced / trafficked labour, discrimination and harassment;
- Prohibiting any contribution to armed conflict or human rights abuses in conflict-affected and high-risk areas.
- Prohibiting interference in any way with the establishment, functioning or administration of workers' organizations or collective bargaining;
- Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law;
- Providing access to remedy by resolving grievances in a timely and culturally appropriate manner;
- Influencing our contractors, suppliers and other organizations with whom PROXIMA STEEL FORGE PVT. LTD. has a leverage to adopt our Sustainable Business Framework and to encourage and support the development of equivalent management systems;
- Developing goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities;
- Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks; and
- Continually improving human rights performance by sharing good practices and learnings, setting and reviewing targets, and monitoring, reporting and disclosing performance. PROXIMA shall sign up to this policy or develop an equivalent that shall be implemented throughout its operations. This policy shall be reviewed periodically for its suitability and updated as necessary once in a year.

Policy Statement - 29

No Bonded, Forced Labour Human Trafficking and Modern Slavery Policy

Document Code	HR-POL-29
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

No Bonded, Forced Labour, Human Trafficking Policy

Proxima does not engage in, or through business partners, complicit to in any form of servitude, forced, state-imposed forced labour, bonded, indentured, trafficked or non-voluntary labour and modern slavery.

Proxima acts rigorously and diligently when engaging and recruiting migrant workers both directly and indirectly.

Proxima does not subject workers to inhumane or degrading treatment, corporal punishment, mental, physical coercion, verbal and/or sexual abuse

Proxima establishes all applicable disciplinary procedures in writing and explains them verbally to workers in clear and understandable terms.

Policy Statement - 30

No Precarious Employment

Document Code	HR-POL-30
Responsibility	HRD

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

No Precarious Employment

Proxima employment relationships do not cause insecurity for the workers.
Proxima engages workers based on recognised and documented employment relationships.
provides workers with understandable information before entering into employment.
Proxima does not use employment arrangements in a way that deliberately conflicts with the genuine purpose of the law.

Policy Statement - 31

Maternity Leave Policy

Document Code	HR-POL-31
Responsibility	Health & Safety Officer

Prepared By
Assistant MR

Checked By
System Coordinator

Approved By
Plant Head

Maternity Leave Policy

जिस महिला कर्मचारी ने कंपनी में साल में 12 महीने में कम से कम 80 दिन अपना काम किया हो वो ही महिला कर्मचारी प्रसव छुट्टी के लिए हकदार होगी इन 80 दिन में सभी सरकारी छुट्टी व ले ऑफ जो भी कानून में दिए गए हों सम्मिलित होंगे ।

जो महिला कर्मचारी किसी कानून के दायरे में नहीं आती है उनको भी प्रसव छुट्टियां दी जाती हैं , यह प्रसव छुट्टी सभी छुट्टियों को मिला कर 26 सप्ताह तक है उदहारण के तौर पर 12 सप्ताह डिलीवरी के बाद जो महिला कर्मचारी राज्य बिमा निगम ऐसी के अंतर्गत आते हैं ने 12 महीने में 70 दिन कार्य किया होगा उसे निगम के द्वारा वेतन सहित छुट्टी दी जाएगी।

प्रसव छुट्टी उन सभी महिला कर्मचारियों को दी जा सकती है जिसने पूर्ण बच्चे को जन्म नहीं दिया हो और यह छुट्टी ज्यादा से ज्यादा 12 सप्ताह की दी जा सकती है और इसके लिए एक स्पेशलिस्ट डॉक्टर का प्रम्माण पत्र होना जरूरी है ।