	GUIDELINES ON PREVENTION OF DISCRIMINATION		Document No. FSC/PR/02
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1. PURPOSE:

The Company is committed to the policy of Equal Employment. This commitment is an integral part of Company's mission to become an "Employer of Choice" – therefore all our HR Policies and Procedures reflect non-discriminatory practices and provide equal opportunity for all employees. As part of this commitment, all employees are expected to treat their colleagues fairly, with mutual respect and without harassment at all levels.

The purpose of this guideline is to outline the steps to ensure an Equal Employment Opportunity Working Environment exists within the company. This Guideline is applicable to all positions and in conjunction with recruitment, selection, appointment, training, learning and development, promotion, company activities and other terms and conditions of employment. The Company is committed to diversity and inclusion to drive business results and create a better future for diverse employees, global customers, partners, and communities.


2. GENERAL PRINCIPLE:

We believe that a diverse workforce allows us to capitalize better on the growth opportunities available for us to match our growth ambitions and drive inclusion across the businesses. The Company prohibits any discrimination on the basis of gender or ethnicity in areas of hiring, pay and promotion where men and women perform work of similar skill, effort, and responsibility. However, there can be some affirmative actions with respect to persons with abilities. We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions and Company Guidelines and Policies.

3. IMPLEMENTATION

- a. The Company will take all actions to ensure that a conducive environment is provided to all employees to perform their role and excel in the same. No employee shall be discriminated in the Company by any employee for any reason attributable to his/her physical abilities.
- b. All Employees are personally responsible for treating each other with respect and dignity which includes respecting the rights and differences of others. Disrespectful behaviour includes, but not limited to, the following –
 - Insult, ridicule, swearing and shouting in personal interaction and common places, over telephone
 - Aggressive gesture
 - Abuse
 - Threatening, including that of loss of employment, and intimidating – both verbal and non-verbal
 - Violent behaviour like slamming the door, table banging, throwing objects, etc.
 - Bullying which includes, but not limited to, constant criticism at work, impossible deadlines, constantly changing targets and assignments, assigning meaningless work or no work,
 - Rude, unpleasant, inappropriate, and unprofessional, impolite, discourteous behaviour that displays a lack of regard for others.
 - Behaviour that causes hurt feelings and distresses, disturbs, and/or offends others
- c. Employment with the Company will be based on merit only regardless of caste, creed, religion, physical ability of a person.
- d. Promotional opportunities will be based on performance, ability and potential, and will be consistent with the needs of the business. There shall be no discrimination based on gender, race, ethnicity, religion, etc.
- e. The Company's Pay structure shall be based on "**Equal Pay for Equal Work**" and there shall be no discrimination based on gender, race, ethnicity, religion, etc.
- f. Astron Paper and Board Mill Ltd. does not support any discrimination in activities pertaining to:
 - Hiring/Employment,
 - Remuneration/Benefits/Punishment/Compensation,
 - Access to rights,



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- Training & Development,
 - Promotion, termination or retirement.
- g. Astron Paper and Board Mill Ltd. does not support any discrimination based on:
- Age,
 - Race,
 - Religion,
 - Caste,
 - Region,
 - National or social origin,
 - Birth,
 - Disability,
 - Gender,
 - Marital Status,
 - Sexual orientation,
 - Political affiliations or Union/ association membership,
 - Political opinions,
 - Any other condition that could give rise to discrimination.
- h. Astron Paper and Board Mill Ltd. does not allow misbehaviour from their employees, including gestures, language and physical contact that are sexually coercive, threatening, abusive or exploitative in the work place and in guest house and colony. Such acts are considered as “Sexual Harassment”. All employees are governed as per the corporate policy of “Anti Sexual Harassment Policy”
- i. Astron Paper and Board Mill Ltd. does not entertain any type of pregnancy or virginity test prior to recruiting or condition for continuation of employment for any female employee.

4. GRIEVANCE REDRESSAL:

The Company shall not tolerate harassment and behaviour that is discriminatory or behaviours that victimizes any individual or group in our workplaces based on any criteria of caste, creed, physical ability etc. Appropriate action basis investigation will be taken if any employee is found breaching this policy either through discrimination, harassment, bullying or victimizing other employee or by making false claims.

Any employee who learns of a potential violation of this guideline is required to report his or her suspicion promptly to the Works Committee. Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct shall be protected against retaliation. All grievances and complaints shall be taken seriously and treated with sensitivity and fairness.

Similarly, if any employee or agent knows or believes that an improper gratification has been or shall be made, the employee or agent must also report such incident to the Works Committee. The Company's policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of the applicable laws or this Policy. The Company shall offer multiple mandatory trainings through various forums and workshops to its suppliers and employees responsible specifically to identify such issues in the company and respond in accordance with the applicable laws. The Company's suppliers shall also be required to assess their businesses and supply chain to ensure compliance with the provisions of the Act and other requirements as incorporated under this Statement.

The reporting of such incident normally should be in writing. In case the reporter is not willing to furnish a written statement of fraud, but is in a position to give sequential and specific transaction of discrimination, then the Member of the Works Committee receiving the information shall record such details in writing as narrated by the reporter and also maintain the details about the identity of the official / employee / other person reporting such incident.





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Reports can be made in confidence and the person to whom the incident has been reported must maintain the confidentiality with respect to the reporter and such matter should under no circumstances be discussed with any unauthorized person.

Member of the Works Committee receiving input about any such incident shall ensure that all relevant records, documents and other evidence is being immediately taken into custody and being protected from being tampered with, destroyed or removed by suspected perpetrators of forced labour or by any other official under his influence.

The Works Committee, conduct preliminary verification of any suspected activity and conduct a appropriate investigation. Such investigation can be vested to any other person or committee as the Works Committee deems fit.

After completion of the investigation, due & appropriate action, which could include administrative action, disciplinary action, civil or criminal action or closure of the matter if it is proved that discrimination is not practiced etc. depending upon the outcome of the investigation, shall be undertaken.

