	<b>GUIDELINES ON PREVENTION OF FORCED LABOUR / COMPULSORY LABOUR</b>		Document No. FSC/PR/03
	REVISION NO.	01	REVISION DATE

Article 23(1) of the Constitution prohibits "beggar" and other similar forms of forced labour and it provides that any contravention of the said prohibition shall be an offence. Bonded Labour System (Abolition) Act, 1976 was promulgated by the Indian Parliament to provide for the abolition of bonded labour system with a view to preventing the economic and physical exploitation of the weaker sections of the people and for matters connected therewith or incidental thereto.

#### 1. PURPOSE:

Our Company is committed to providing work environment that ensures every employee is treated with dignity, respect and afforded equitable treatment. The Company strictly prohibits the deployment of forced labour and human trafficking in all company operations across the group. The company strictly believes in **"NO FORCED/BONDED LABOUR"**.

The Policy has been established in order to make the company position clear to all its employees, suppliers and their co-workers, as well as any other parties. The requirements in this guideline are mandatory to all employees working in the company, company suppliers and their sub-contractors.

#### 2. GENERAL PRINCIPLE:

According to ILO norms, "Forced labour" is defined as work or service extracted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him or herself voluntarily. It includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, and internal or international trafficking.


#### 3. IMPLEMENTATION

- The Company ensures that employees working in our establishment/factory are doing so voluntarily and does not engage in or support the use of forced labour.
- The Company does not engage or support the use of Forced / Bonded Labour in any of our manufacturing activities / allied activities whether in existence or to be opened in future.
- All the Administrative Heads of any Facility of the Company shall promote, advice and shall ask its sub- contractor / vendors to discourage the engagement of Forced / Bonded Labour being clear case of violation of law of land.
- Personnel shall have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment provided that they give reasonable notice to their employer. This is in compliance with Indian Bonded labour system (Abolition) Act, 1976 and the Contract Labour (Regulation and Abolition) Act, 1970.
- Neither the company nor any entity supplying labour to the company shall withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
- Neither the company nor any entity supplying labour to the company shall engage in or support trafficking in human beings.
- All employees shall be informed of the terms of their employment i.e., job description, hours of work etc.
- The Company do not engage or support vendors & suppliers who resort to using forced labour in their operations.
- The Company shall not keep permanently any original documents like educational certificates, Identity documents, Date of Birth Certificates, Domicile documents etc. of any employee but will only ask for deposition of photocopies of such documents for verification purposes only

#### 4. PROCEDURE FOR MONITORING OF FORCED/COMPULSORY/BONDED LABOUR:



21/08/22

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- **Astron Paper and Board mill Ltd. doesn't support or engage the use of forced or compulsory labour.**
- Astron Paper and Board Mill Ltd. or it's recruitment partners/associated contractors do not retain original documents of employee/ contract worker as part of forced or compulsory labour or any other purpose.
- It is also ensured that Astron Paper and Board Mill Ltd. or it's recruitment partners/associated contractors do not require the employee/contract labour to retain deposit or part of payment from salary upon commencing employment by employee/ contract labour.
- It is also ensured that Astron Paper and Board Mill Ltd. or it's recruitment partners/associated contractors do not withhold any salary, benefits, property or documents in order to force employee/ contract worker to continue to work.
- It is also ensured that Astron Paper and Board Mill Ltd. or it's recruitment partners/associated contractors do not charge the employee/ contract worker, any employment fee/cost whether fully or partially.
- In case of emergency, family members/ relatives are allowed to access work place.
- Astron Paper and Board Mill Ltd. ensures that relevant provisions for forced labour or compulsory labour are covered in the agreements with its recruitment partners/associated contractors.
- Astron Paper and Board Mill Ltd. shall periodically conduct due diligence in regard to forced labour or compulsory labour, specially with its associated contractors.

#### **5. FORCED/COMPULSORY/BONDED LABOUR PREVENTION FRAMEWORK & COMPLIANCE:**

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.

1. 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 child labour laws or this Policy. The Company's suppliers shall also be required to assess their businesses and supply chain to ensure compliance with the provisions of the Child Labour Act and other requirements as incorporated under this Statement.
2. 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, 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.
3. 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.
4. Member of the Works Committee receiving input about any such incident / nodal officer(s) 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.
5. The Works Committee, conduct preliminary verification of any suspected activity and conduct an appropriate investigation. Such investigation can be vested to any other person or committee as the Works Committee deems fit.
6. 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 forced/bonded labour is not engaged etc. depending upon the outcome of the investigation, shall be undertaken.

