

1. PURPOSE:

Our Company is committed not to accept child labour, and works actively against it. The complexity of the child labour issue requires a consistent, long-term effort to create sustainable and broad-based solutions in order to reach our goal; that no products delivered by the Company and delivered to the Company are produced by child labour. The Company respects different cultures and values in countries where it operates and sources its products, but does not compromise on the basic requirements regarding the Rights of the Child.

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:

The Company shall not accept child labour. It supports the United Nations (U.N.) Convention on the Rights of the Child (1989). The Child Labour policy is based on this Convention, which stipulates:


- "All actions concerning the child shall take full account of his or her best interests." Article 3.
- "The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development". Article 32.1.

3. IMPLEMENTATION

- As a policy the Company shall not engage anyone below the age of eighteen. It shall also not any labour below the age of eighteen to be engaged by any contractor to be deployed in its premises. All actions to avoid child labour shall be implemented by way of verification of age certificate and any other relevant document which authenticates the date of birth of the person.
- The Company requires that all its employees, suppliers shall recognise the U.N. Convention on the Rights of the Child, and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production. Suppliers and contractors are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers' and their sub-contractors' places of production.
- If child labour is found in any place of production, the company will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, the Company will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration, i.e., family and social situation and level of education. Care shall be taken not merely to move child labour from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the child's development.
- The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of the company's Child Labour Policy, and ensure that all measures required are implemented accordingly.

4. PROCEDURE FOR MONITORING OF CHILD WORKER

- Any employee/ contract worker below 14 years of age is considered as child worker.
- Any employee/ contract worker above 14 years & below 18 years is considered as young person.
- Astron Paper and Board Mill Ltd. is committed not to support or engage child worker and/or young person in any of its activities or processes.
- Age of employee/ contract worker shall be **minimum 18 years** at the time of joining.
- It is the policy of the Company to ensure that **no child worker and/or young person is employed** for any activities of the Company
- One of following documents are verified with original documents at the time of joining of employee/ contract worker to ensure correct age.
 - Aadhar Card

		GUIDELINES ON PREVENTION OF CHILD LABOUR		Document No. FSC/PR/01
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- Voter ID card issued by election commission
- Driving License
- Pan Card
- Any other document issued by competent authority.
- Application form along with above mentioned documents and two photographs are received and maintained as document of compliance.
- Original documents are returned to candidate upon successful completion of verification. Photocopy of original documents are retained as evidence.
- These documents are thoroughly scrutinized with all aspects to ensure correctness.
- Age documentation of all the employees is maintained in individual employee file.
- In case if the employee provides wrong information on his/her date of birth, the same can be verified while registering for PF, as any mismatch of details shall result in rejection of PF.
- Whenever in doubt regarding age of an employee, medical opinion can be sought from a registered dentist to ascertain the age of employee.

5. CHILD 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 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 child labour or by any other official under his influence.
5. 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.
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 child labour is not engaged etc. depending upon the outcome of the investigation, shall be undertaken.

