

GUIDELINE ON **FORCED** **BONDED**

LABOUR PROHIBITION
AT THE WORKPLACE



GUIDELINE NO HR/61

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 for all employees working in the company, company suppliers and their sub-contractors.

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An **INOXGFL** Group Company
BEYOND INFINITY

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01. BACKGROUND

Article 23(1) of the Constitution prohibits “begar” 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. Our Company, Gujarat Fluorochemicals Limited, GFL Americas LLC., GFL GmbH, GFL GM Morocco, 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”.



02. SCOPE

This policy applies to all categories of employees of the Company, including Management, Workmen, Apprentices and Employees on contract at our workplace, premises and precincts, and including all offices, godowns etc of Gujarat Fluorochemicals Limited and its subsidiaries.



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03. POLICY

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 do 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 does not engage or support vendors & suppliers who resort to using forced labor in their operations.

The Company shall not keep permanently any original original documents like educational certificates, Identity documents, Date of Birth Certificates, Domicile documents etc of any employee but will only ask for deposition of such documents for verification purposes only.

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04. FORCED/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 Company Ethics 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.

4.1 If confronted with such an incident for violation of this Policy, it must be immediately rejected and reported to the Company's Ethics Committee of the respective business comprising of the following incumbents:

Chief Executive Officer of the Business

Chief Finance Officer of the Business

Unit Head or Site Head/Functional Head as the case may be

Group Chief Finance Officer

Head — Group Corporate Human Resources

Company Secretary

The Company Secretary shall be the "Company Ethics Officer" and any three member of the above List and along with the Company Secretary shall form a quorum of the Ethics Committee. 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 Ethics Committee.

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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 forced/bonded labour laws or this Policy.

The Company shall offer multiple mandatory trainings through various forums and workshops to its suppliers and employees responsible 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 Forced/Bonded Labour Act and other requirements as incorporated under this Statement.

4.2 The Company Secretary shall be the "Company Ethics Officer" and any three member of the above List and along with the Company Secretary shall form a quorum of the Ethics 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 related laws or this Policy.

4.3 Any employee (full time, part time or employees appointed on adhoc / temporary / contract basis), vendors, suppliers, contractors, consultants, service providers or any other agency or their representative doing any type of business with the Company as soon as he comes to know of any forced/bonded labour must report such incident to any member of the Ethics Committee.

4.4 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 Ethics 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.

4.5 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.

4.6 Member of the Ethics 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.

4.7 The Ethics 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 Ethics Committee deems fit.

4.8 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.

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4.1.1. COMPLIANCE

Breach of this Policy will not be tolerated and will be liable to be subjected to disciplinary action, which may extend up to suspension and dismissal from service.



05. POWER TO AMEND

Any change of the guideline shall be approved by the Head – Group Corporate HR.

The Management shall have the overriding right to withdraw and/or amend the guideline at its own discretion as it deems fit from time to time. The decision of the management shall be final and binding:



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