

CORPORATE SOCIAL ACCOUNTABILITY POLICY & MANAGEMENT SYSTEM MANUAL

1st July, 2019 (Issue 01, Revision 00)



GUJARAT
FLUORO-CHEMICALS
LIMITED

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FOREWORD

The Company has undertaken various steps towards Sustainability & Social Accountability as a strategic initiative. As part of this endeavour, the company has taken a target to get itself certified in SA8000 by Social Accountability International and framed this Social Accountability Manual.

This manual is the first edition for the financial year which is being submitted to the Social Accountability Corporate Steering Committee and is framed to lay down the procedures that will help ensuring the highest quality of social compliance across the complete supply chain, all the while without sacrificing business interests. As a way forward, this shall serve as guiding document to create better service mechanisms.

Sd/-

Kallol Chakraborty (Head – GCHR)

Secretary – Social Accountability Corporate Steering Committee
& Corporate Social Accountability Management Representative

Our Social Accountability Goals

Our Social Accountability Goals

Social Accountability Goals

We say NO to

- Child labor
- Forced labor
- Discrimination
- Harassment
- Unsafe working conditions
- Unethical business practices
- Unfair labor practices
- Unethical marketing
- Unethical procurement
- Unethical sales
- Unethical distribution
- Unethical recycling
- Unethical disposal

We say YES to

- Human rights
- Environmental protection
- Community development
- Worker safety
- Product quality
- Gender equality

Logos at the bottom: **UN Global Compact**, **GLE**, **GLOBAL ENVIRONMENTAL INITIATIVE**, **GFL & GMI**

Guiding Principles for Human Resources Management in Gujarat Fluorochemicals Limited

At GFL, we recognize that our employees are the key to Company's success. For us, the continuous development and engagement of our human resources is a business imperative.

To achieve the Company's Mission, Vision and Goals, the Human Resource function of the Company shall adopt the

"10 PRINCIPLES of Human Resources Management of GFL" and operate all its processes based on the same.

- Build **safe, healthy and secure workplace** with the involvement of all employees.
- Implement robust, fair, transparent and non-discriminatory process to **attract, develop and retain talent** needed for business delivery and growth.
- Uphold and respect **Human Dignity, Equality, and Human Rights** at the workplace.
- Provide **continuous learning opportunities** for the growth and development of all employees.
- Ensure **continuous two - way communication and participation** of all employees and respect their views and opinion and involve them in decision making.
- Establish **meritocracy** without any bias or discrimination in connection to performance evaluation, career progression, rewards and recognition
- **Pay for performance** based on internal and external parity.
- Encourage **creativity and innovation to fuel growth**.
- Create an engaged work environment of **teamwork and camaraderie** with a **bias for responsible execution and excellence**.
- **Drive social accountability and responsibility and ensure ethical governance**.

To implement the above PRINCIPLES the Human Resource Function shall:

- Design and establish robust Operational Policies, Processes and Procedures in all aspects of Human Resources Management,
- Continually improve the same to bring in the right practices to enable growth,
- Educate all employees on the same for their understanding and appreciation, and
- Follow the rule of the land and all international standards as applicable to Labour and Social accountability.

V K Jain

1st June,2019

CHAPTER I – Company Overview

Gujarat Fluorochemicals Limited (GFL), a part of the Inox Group, is the largest manufacturer of chloromethanes, hydro-chloro-fluorocarbons (HCFC) and various grades of PTFE in India. The company operates its PTFE business through its manufacturing facility in Dahej, Gujarat. The company possesses the largest PTFE facility in India and 4th largest in the world. Further, its forward and backward integrated operations make it one of the most cost competitive producers of these chemicals globally. The company has successfully created a niche for itself in the chemicals business and is set to explore markets for more value added products while continuing to gain from its other diversified businesses.

Established in 1987, Gujarat Fluorochemicals Limited (GFL) is today one of the India's largest producer of chloromethanes, refrigerants and polytetrafluoro-ethylene. We are among the few fully vertically integrated manufacturing company providing reliable and high quality products.

VISION

- To become the preferred the suppliers of fluoropolymers, fluoroelastomers and new generations of refrigerants globally and achieve this status through technological, operational and service excellence.
- We shall endeavour to be a global player in our business.
- We shall constantly endeavour to delight customers, workforce and all other stakeholders. We shall do our business exercising with utmost care of environment and society at large.

MISSION

We shall endeavour to always be the market leaders, by providing our customers the latest, the most innovative and the best available technologies, products and services. Through this, we shall provide to our customers the best "value for money" by producing best in class quality products at most competitive prices.

VALUES

We are governed by our fundamental values:

- Quality: Commitment to excellence in quality
- Integrity: Building trust in dealing with all stakeholders
- Customer Value: delight the customers and deliver the value
- Excellence: excellence in services and manufacturing practices to all our stakeholders
- Innovation: enthuse our clients through our innovative approach

KEY STRENGTHS

- The Company is one of the most competitive producers of fluoropolymers on account of its fully integrated manufacturing operations beginning from basic raw materials to end product
- The Company's robust R&D facilities helps it develop new products and grades in a short span of time enabling it to enhance its offerings portfolio
- The Company operates in an industry which requires huge capex. Thus, it is unlikely to face new international competition in the industry
- The Company's continuous engagement with its customers helps it understand and fulfil their requirements
- The Company is capable of carrying out further expansion with minimal investments in future
- The Company has tie ups with global majors such as Chemours/AGC for supplying their needs of fluoropolymers due to GFL's efficient & integrated plants

Product portfolio

Refrigerants

The company is a prominent manufacturer and exporter of Chloro-Fluorocarbon refrigerant gases R-12 & R-22. These grades are manufactured in technical collaboration with M/s Pennwalt Corporation USA (now Atochem, North America), under the "Refron" brand name. In addition to HCFC, the Company is also engaged in supply and export of new genre gases in 400 & 500 series. Further, its contemporary manufacturing facilities, quality control and adequate storage facilities helps it stand competition in the market. In the coming period, the company plans to enter the more eco-friendly domain of CFC free refrigerants segment comprising of 404A, 407C, 410A.

Chemicals

The chemical business segment of GFL comprises of Caustic Soda Lye, Methylene Chloride, Hydrogen Gas, AHCL, HCL and H₂SO₄. The Company carries out stable business operations with its focus on capacity utilization and cost of raw materials namely, salt, methanol and power. In case of power, the company possesses its own CPP capacity which is based on coal, gas and wheel in power from GFL owned wind turbines while the balance power is purchased from grid/power exchange.

Fluoropolymers

GFL is a leading player in PTFE market, engaged in operation of one of the largest PTFE facilities in the world, accounting for 11% of the global PTFE capacity. The major key barriers to entry in this market are high capex intensity, restricted access to technology, the availability of key raw materials, long and stringent product development, and an approval cycle with customers. The company benefits from the advantage of these barriers as new players cannot easily enter this market on a standalone basis. The company has the capable of producing a wide range of chemicals through its vertically integrated facility, which makes it one of the most cost competitive producers of PTFE globally.

The operational and costing advantage of this integration has ensured that the Company is well placed competitively and is less susceptible to the volatility of the commodity cycle. Further, the company obtains benefits from increasing capacity utilisation which results in a significant increase in operating leverage, higher operating margins and better return ratios. GFL's gradual shift to value added products for its customers prompts it to generate better margins and more stable pricing for its products.

Fluorospecialty Business

Looking at the recent upsurge in fluorine based Agro and Pharma molecules , and also taking in to consideration our niche capability of making Fluorine based chemicals, our Company, for past few years, has been working on establishing the capability of developing these Fluor intermediates through non-infringing competitive processes at the state of the art R&D Centre set up at Ranjitnagar. The team of highly capable scientists and support technical teams have been working tirelessly on new product developments. In past few years of its existence the R&D has successfully developed many Molecules for Pharmaceutical and Agro applications against specific enquiries.

A couple of products have already been launched earlier at Ranjitnagar Unit and one of the product is already launched at the Dahej A Unit last year and a few more are slated to be launched this year at Ranjitnagar Unit in the Multi Product Plant clusters, which will be commissioned soon. These Multiproduct Plants at Ranjitnagar Unit will have capability to handle different chemistries making the Plants highly versatile and flexible, where product replacement and introduction of new products at short notice to service the market is possible.

The R&D Centre, over the few years of its existence, has developed dexterity and alacrity required to support and sustain this business, where speed of response to customer's enquiries is of prime importance. Having

already established credibility with major innovator Companies across the globe and also in India, we are upbeat about the prospects of this Business.

Subsidiaries

Inox Leisure Limited:

INOX Leisure Limited (INOX) is amongst India's largest multiplex chains with 143 multiplexes and 595 screens in 67 cities as on 30th June, 2019. INOX has redefined movie experiences in India making it truly a 7-star experience. Each INOX property is unique with its own distinct architecture and aesthetics. Beyond the normal screens, INOX also has INOX INSIGNIA for the discerning audience or KIDDLES for young patrons or MX4D® EFX Theatre for an immersive experience or the panoramic viewing with ScreenX at select locations. INOX brings the very latest in projection and audio technology with INOX Laserplex, IMAX & INOX ONYX. Some of the key multiplex features include plush micro adjustable leather recliners with a butler on call facility, gourmet meal choices by celebrity chef, designer staff uniforms.

Inox Wind Limited:

Inox Wind Limited is a fully integrated wind energy solution provider engaged in manufacture of wind turbines in India. The Company has a wind turbine manufacturing capacity of 1,600 MW and a cumulative installed base of more than 2.6 GW out of India's installed base of 34 GW. The company has manufacturing facilities near Ahmedabad (Gujarat) and Barwani (Madhya Pradesh) for blades & tubular towers and at Una (Himachal Pradesh) for hubs & nacelles.

Inox Renewables Limited:

Commenced in 2007, Inox Renewables Limited is engaged in business of wind farming. Presently, the Company operates wind farms with a total capacity of 31 MW.

Joint venture and foreign subsidiaries:

GFL has strengthened its supply chain of critical raw materials through its investment in joint venture, Morocco. It has also incorporated two subsidiaries to strengthen its presence in the international markets - Gujarat Fluorochemicals Americas LLC and Gujarat Fluorochemicals GmbH.

PRINCIPLE OF BUSINESS OPERATIONS (Our Social Accountability Principles)

GFL has adopted the following principles/social accountability principles for all its business operations:

Principle 1: We will conduct Businesses and govern ourselves with Ethics, Transparency and Accountability.

Principle 2: We will provide goods and services that are safe and contribute to sustainability throughout their life cycle.

Principle 3: We will promote the well-being of all employees.

Principle 4: We will respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

Principle 5: We will respect and promote human rights.

Principle 6: We will respect, protect, and make efforts to restore the environment.

Principle 7: We will engage in influencing public and regulatory policy, should do so in a responsible manner.

Principle 8: We will support inclusive growth and equitable development.

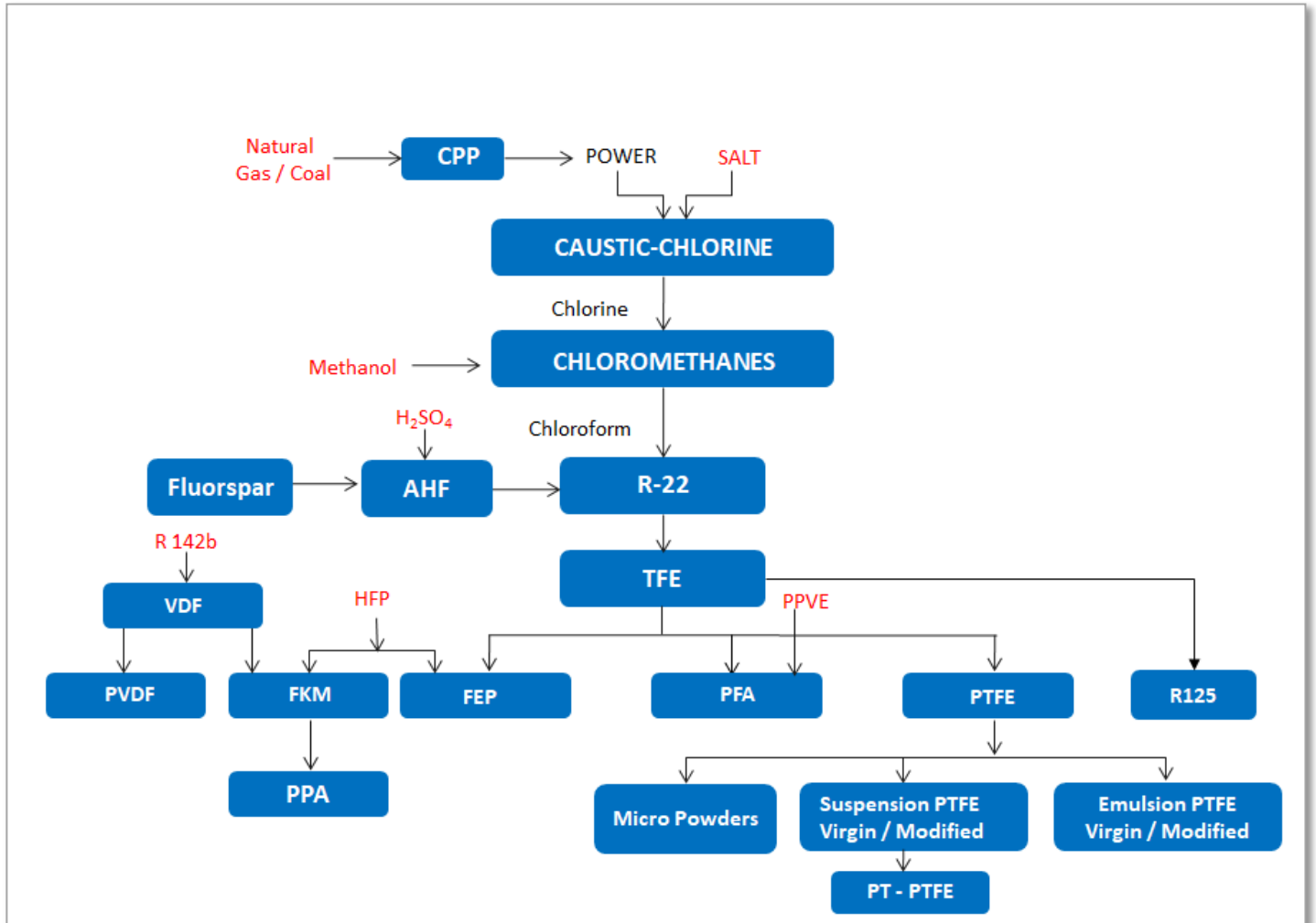
Principle 9: We will engage with and provide value to their customers and consumers in a responsible manner.

Manufacturing Facilities

The company operates in all its business segment through its state of the art manufacturing facilities (refer table 1 for details), which facilitates simpler and more cost efficient manufacturing process. In the refrigeration segment, the company operates with one of the largest and most efficient plant of refrigerant gases. The company continuously carries out up gradation of all its facilities for quality specifications, recoveries, valorisation of by-products, energy conservation, environment and safety controls etc; through in-house technological improvement initiatives. The two major manufacturing facilities of the company are situated in Ranjitnagar (Gujarat) and Dahej.

Table 1: Summary of our Manufacturing units

Plant	District/City	Set up in	Location	Products
Ranjitnagar	Ghogambha District, Gujarat	1989	Located 57 kms from Vadodara near Halol	Refrigerants and Speciality Chemicals
Dahej	Bharuch District, Gujarat	2007	Located 45 kms from Bharuch	PTFE



Exports

The revenue from export sale of HCFC22, PTFE, PFA, FEP, FKM accounted for about 70% in the total revenue. The key markets for HCFC22 are the Middle East, South Asia and Japan. While for PTFE exports are largely to Europe and USA.

CHAPTER 2 – PURPOSE & SCOPE

1. PURPOSE AND SCOPE

1.1 Purpose:

Company has developed and implemented Social accountability Management System in accordance with the requirements of SA8000:2014 standard in order to improve its social performance and meet its policy commitments. This Social Accountability Manual describes how these requirements will be implemented considering the nature of operation of the Plant.

1.2 Scope:

This Corporate Sustainability and Social Accountability Policy Manual addresses the social accountability, international human rights and national labour laws and customer ethical standards and prevailing industry practices concerning to Gujarat Fluorochemicals Limited. This is applicable to both of our units – Dahej & Ranjitnagar covering 2611 personnel in Dahej & 790 in Ranjitnagar including contractual employees. The scope of each unit is mentioned below:

Plant-1 –Dahej – Scope – Manufacturing and Supply of Caustic Soda, Chlorine, Hydrogen, Chloromethanes, Anhydrous Hydrogen Fluoride, TFE, VDF, R22, R125, FKM (Fluoroelastomer), different Grades of PTFE, PFA, FEP, Micropowders, PPA (Polymer Processing Aids) and by-products like: HCl, H₂SO₄, Dilute HF, Fluorosilicic Acid and Calcium Chloride.

(Process Flow: -Power & Chemical: CPP > Caustic Chlorine > Chloroethanes > R-22 > TFR)
Process Flow – Polymer: VDF > PVF > R-255 > FKM > FI > SR1 & SR2)

Plant -2 –Ranjitnagar - Scope-2: Manufacture & supply of fluorocarbons, its by-products and testing of cylinders (captive purpose). Development, Manufacture and Supply of Fluorospeciality Chemicals.

(Process Flow: Raw Material / Resources > Resources & Requirement > Inputs > Utility > Information > Monitoring & Measurement > Performance Indicators)

1.3 Structure of the Social Accountability Manual:

The Social Accountability Manual is structured according to the Index. The individual chapters are sub divided into paragraphs. Pages of all the chapters of this document are numbered separately by stating chapter number and page number. This Social Accountability Manual is issued with "each page loose" filing.

1.4 Issuance:

The Management Representatives of Dahej & Ranjitnagar are entrusted by the Management of Organization to prepare and modify this Social Accountability Manual. The SA manual is made available on Internet. The read only access is given to concerned personnel.

1.5 Revision:

The Social Accountability Manual is scrutinized by the MANAGEMENT REPRESENTATIVES of both Dahej & Ranjitnagar and if found necessary, it will be revised in consultation with the departments concerned. The revisions will be carried out chapter-wise and the revision status will be indicated in the table of contents and in all pages of each chapter.

1.6 Edition

Whenever the total manual undergoes revision on account of revision of standards or otherwise, separate edition will be brought out and the edition status will be mentioned in the cover page of the Social Accountability Manual.

1.7 Language

The Social Accountability Manual of Company will be made available in the local language as per the respective units location i.e. English, Hindi & Gujarati.

CHAPTER 3 - NORMATIVE ELEMENTS AND THEIR INTERPRETATION

The Company complies with national and all other applicable laws, prevailing industry standards, other requirements to which the company subscribes, and this standard. The laws presently applicable and which have a relation to the social accountability aspects are listed below:

S. no.	Legislation
01.	THE CHILD LABOUR (PROHIBITION & REGULATION) ACT, 1986
02.	THE CONTRACT LABOUR (REGULATION & ABOLITION) ACT, 1970, as amended by THE DELEGATED LEGISLATION PROVISION [Amendment Act, 2004]
03.	THE EMPLOYEES PROVIDENT FUNDS & MISCELLANEOUS PROVISIONS ACT, 1952 & AMENDMENT ACT, 1998 (10 of 1998) (i) THE EMPLOYEES' PROVIDENT FUND SCHEME, 1952 (ii) THE EMPLOYEES' PENSION SCHEME, 1995 (iii) THE EMPLOYEES' DEPOSIT LINKED INSURANCE SCHEME, 1976
04.	THE EMPLOYMENT EXCHANGE (COMPULSORY NOTIFICATION OF VACANCIES) ACT, 1959
05.	THE EQUAL REMUNERATION ACT, 1976
06.	THE FACTORIES ACT, 1948 AND GUJARAT FACTORIES RULES, 1963
07.	THE BONDED LABOUR SYSTEM (ABOLITION) ACT, 1976
08.	THE MATERNITY BENEFIT ACT, 1961
09.	THE MINIMUM WAGES ACT, 1948
10.	THE PAYMENT OF WAGES ACT, 1936
11.	THE PAYMENT OF BONUS ACT, 1965 & THE PAYMENT OF BONUS RULES 1975
12.	THE PAYMENT OF GRATUITY ACT, 1972
13.	THE INDUSTRIAL DISPUTES ACT, 1947
14.	THE APPRENTICES ACT, 1961
15.	THE TRADE UNIONS ACT, 1926
16.	THE BOMBAY LABOUR WELFARE FUND ACT, 1953 as amended by THE BOMBAY LABOUR WELFARE FUND [GUJARAT AMENDMENT) ACT, 2005
17.	THE INDUSTRIAL EMPLOYMENT (STANDING ORDER) ACT, 1946
18.	THE EMPLOYEE COMPENSATION ACT, 1923

When national and other applicable laws, prevailing industry standards, other requirements to which the company subscribes, and this standard address the same issue, the provision most favourable to workers applies.

S. no.	Legislation
19.	THE ENVIRONMENT (PROTECTION) ACT, 1986 AND RULES, 1986
20.	WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974 AND RULES, 1975
21.	WATER (PREVENTION AND CONTROL OF POLLUTION) CESS ACT, 1977 AND RULES, 1978
22.	AIR (PREVENTION AND CONTROL OF POLLUTION) ACT, 1981 AND RULES, 1982
23.	HAZARDOUS WASTE (MANAGEMENT AND HANDLING) RULES, 1989
24.	MANUFACTURE, STORAGE AND IMPORT OF HAZARDOUS CHEMICAL RULES, 1989
25.	PETROLEUM ACT, 1934 AND RULES, 2002

The Company also respects the principles of the following international instruments, text of which are compiled in the Manual of ILO Conventions and Recommendations:

S. No	Convention/Recommendation No.	Issue Addressed
1.	ILO Convention 1 and Recommendation 116	Hours of Work-Industry and Reduction of Hours of Work
2.	ILO Conventions 29 and 105	Forced Labour and Abolition of Forced labour
3.	ILO Convention 87	Freedom of Association
4.	ILO Convention 98	Right to Organise and Collective Bargaining
5.	ILO Convention 100 and 111	Equal Remuneration and Discrimination-Employment and Occupation
6.	ILO Convention 102	Social Security - Minimum standards
7.	ILO Convention 131	Minimum Wage Fixing
8.	ILO Convention 135	Workers' Representatives
9.	ILO Convention 138 and Recommendation 146	Minimum Age
10.	ILO Convention 155 & Recommendation 164	Occupational Safety & Health
11.	ILO Convention 159	Vocational Rehabilitation & Employment- Disabled Persons
12.	ILO Convention 169	Indigenous and Tribal Peoples
13.	ILO Convention 177	Home Work
14.	ILO Convention 181	Private Employment Agencies
14.	ILO Convention 182	Worst Forms of Child Labour
15.	ILO Convention 183	Maternity Protection
16.	ILO Code of Practice on HIV/AIDS and the World of Work	
17.	Universal Declaration of Human Rights	
18.	The International Covenant on Economic, Social and Cultural Rights	
19.	The International Covenant on Civil and Political Rights	
20.	The United Nations Convention on the Rights of the Child	
21.	The United Nations Convention to eliminate All Forms of Discrimination Against Women.	
22.	The United Nations Convention on the Elimination of All forms of Racial Discrimination	
23.	The Gujarat Prohibition Act -2017 & The Gujarat Prohibition Rule – 2012	

- UN Global compact principles, SDGs

Note – Any amendments in the above laws/ILO conventions shall be automatically applicable as per the applicable laws and ILO Conventions.

CHAPTER 4 – DEFINITIONS

- i. **Shall**: In this Standard the term “shall” indicates a requirement. Note: italics have been added for emphasis.
- ii. **May**: In this standard the term “may” indicates a permission. Note: italics have been added for emphasis.
- iii. **Organisation**: The entirety of any business or non-business entity responsible for implementing the requirements of this standard, including all personal employed by the organization. Note: For example, organization include: companies, corporation, farms, plantations, cooperatives, NGOs and government institutions.
- iv. **Personnel**: All individuals employed over contracted by an organization including but not limited to director, executives, managers, supervisors, workers and contract workers such as security guards, canteen workers, dormitory workers and cleaning worker.
- v. **Worker**: All non-management personnel.
- vi. **Supplier / Subcontractor**: Any entity or individuals(s) in the supply chain that directly provides the organisation with goods or services integral to, utilized in or for the production of the organisation’s good or services.
- vii. **Sub-supplier**: Any entity or individuals(s) in the supply chain that provides the supplier with goods and/or services integral to, utilised in or for the production of the supplier or the organisation goods or services.
- viii. **Corrective Action**: Action to eliminate the cause(S) and root cause(S) of a detected non-conformance. Note: corrective action is taken to prevent occurrence.
- ix. **Preventive Action**: Action to eliminate the cause(S) and root cause(S) of a potential non-conformance. Note: preventive action is taken to prevent occurrence.
- x. **Interested Party**: Individual or group concerned with or affected by the social performance of the company.
- xi. **Child**: Any person under 15 years of age, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality.
- xii. **Young Worker**: Any worker over the age of a child as defined above and under the age of 18.
- xiii. **Child Labour**: Any work by a child younger than the age(s) specified in the above definition of a child, except as provided for by ILO Recommendation 146.
- xiv. **Forced or Compulsory Labour**: All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation, or is demanded as a means of repayment of Debt.
- xv. **Human Trafficking**: The recruitment, transfer, harbouring or receipt of persons, by means of the use of threat, force, other forms of coercion, or deception for the purpose of exploitation.
- xvi. **Remediation of Children**: All support and actions necessary to ensure the safety, health, education, and development of children who have been subjected to child labour, as defined above, and have been subsequently dismissed.
- xvii. **Home Worker**: A person who is contracted by the organization or by its supplier, sub – supplier or subcontract, but does not work on their premises.
- xviii. **Interested parties**: An individual or group concerned with or affected by the social performance and /or activities of the organization.
- xix. **SA8000 Worker Representative**: A worker chosen to facilitate communication with senior management on matters related to SA 8000, undertaken by the recognized trade union(s) in unionized facilities and, elsewhere, by a worker elected by non-management personnel for that purpose.
- xx. **Management Representative**: A member of senior management personnel appointed by the company to ensure that the requirements of the standards are met.
- xxi. **Worker Organization**: An autonomous voluntary association of workers organized for the purpose of furthering and defending the right and interests of workers.
- xxii. **Collective Bargaining Agreement**: A contract specifying the terms and conditions for work, negotiated between an organisation (e.g. employer) or group of employers and one or more worker organization(S).
- xxiii. **Living Wage**: The remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker & her or his family. Elements of a decent

standard of living include food, water, housing, education, health care, Transport, Clothing & other essential needs including provision for unexpected events.

- xxiv. Non- conformance: Non-compliance with a requirement.
- xxv. Private employment agency: Any entity, independent of the public authorities, which provides one or more of the following labour market services. Matching offers of and applications for employment, without the agency becoming a party to the employment relationship(s) which may occur; Employing workers with a view to making them available to a third entity, which assigns their tasks and supervises the execution of these tasks
- xxvi. Remediation of child labourers: All support and actions necessary to ensure the safety, health, education and development of children who have been subjected to child labour, as defined above, and whose works has been terminated.
- xxvii. Risk assessment: A process to identify the health, safety and labour policies and practices of an organisation and to prioritise associated risks.
- xxviii. SA8000 worker representative (s): One or more worker representative(s) freely elected by workers to facilitate communication with the management representative(s) and senior management on matters related to SA8000. In unionised facilities the worker representative(s) shall be from the recognized trade union(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organization is not unionised, workers may freely elect the worker representative(s) for that purpose.
- xxix. Social performance: An organisation's achievement of full and sustained compliance with SA8000 while continually improving.
- xxx. Stakeholder engagement: The participation of interested parties, including but not limited to the organisation, trade unions, workers, worker organizations, suppliers, contractors, buyers, consumers, investors, NGOs, media and local and national governments officials.
- xxxi. Supplier/Subcontractor: Any entity or individual(s) in the supply chain that directly provides the organization with goods or services integral to, utilized in or for the production of organization's goods or services.
- xxxii. Sub-Supplier: Any entity or individual(s) in the supply chain that provides the supplier with goods and/or services integral to, utilised in or for the production of the supplier's or the organization's goods or services.
- xxxiii. Worker Organization: An autonomous voluntary association of workers organized for the purpose of furthering and defending the rights and interests of workers.
- xxxiv. Young Worker: Any worker under the age of 18 but over the age of a child, as defined above.

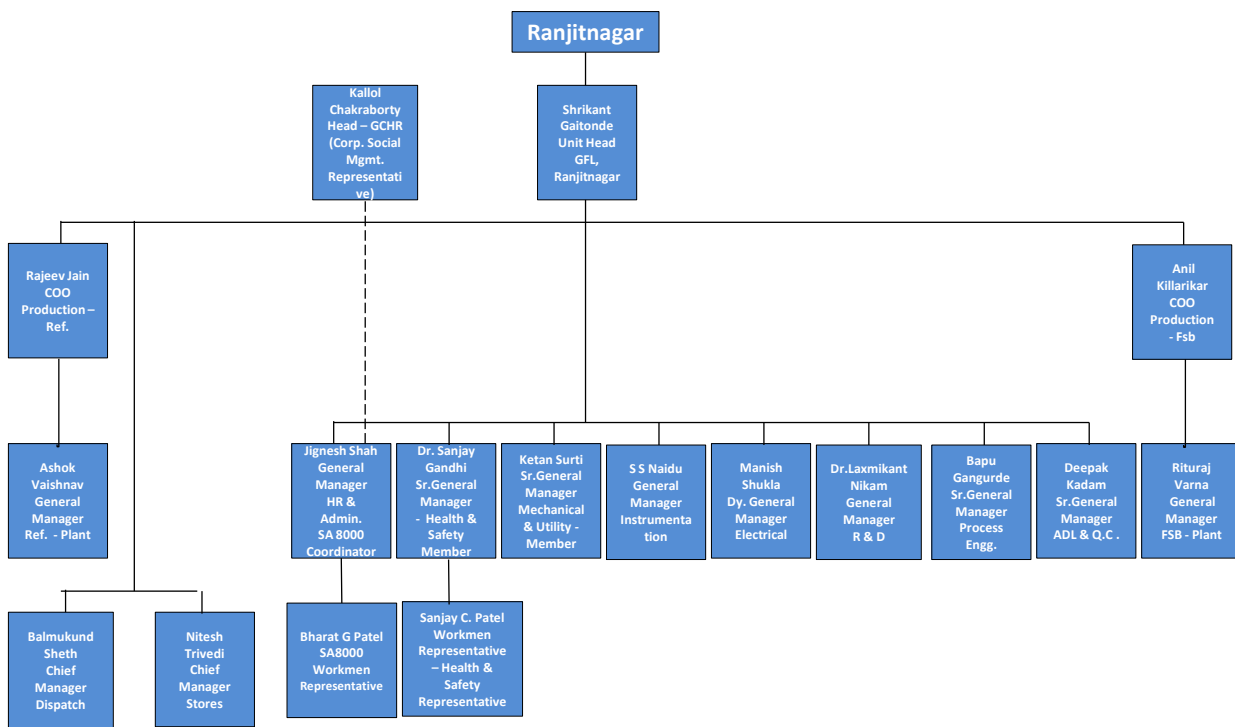
CHAPTER 5 - ORGANIZATIONAL STRUCTURE

The Unit Head is overall in charge of their respective units of GFL - Dahej & Ranjitnagar.

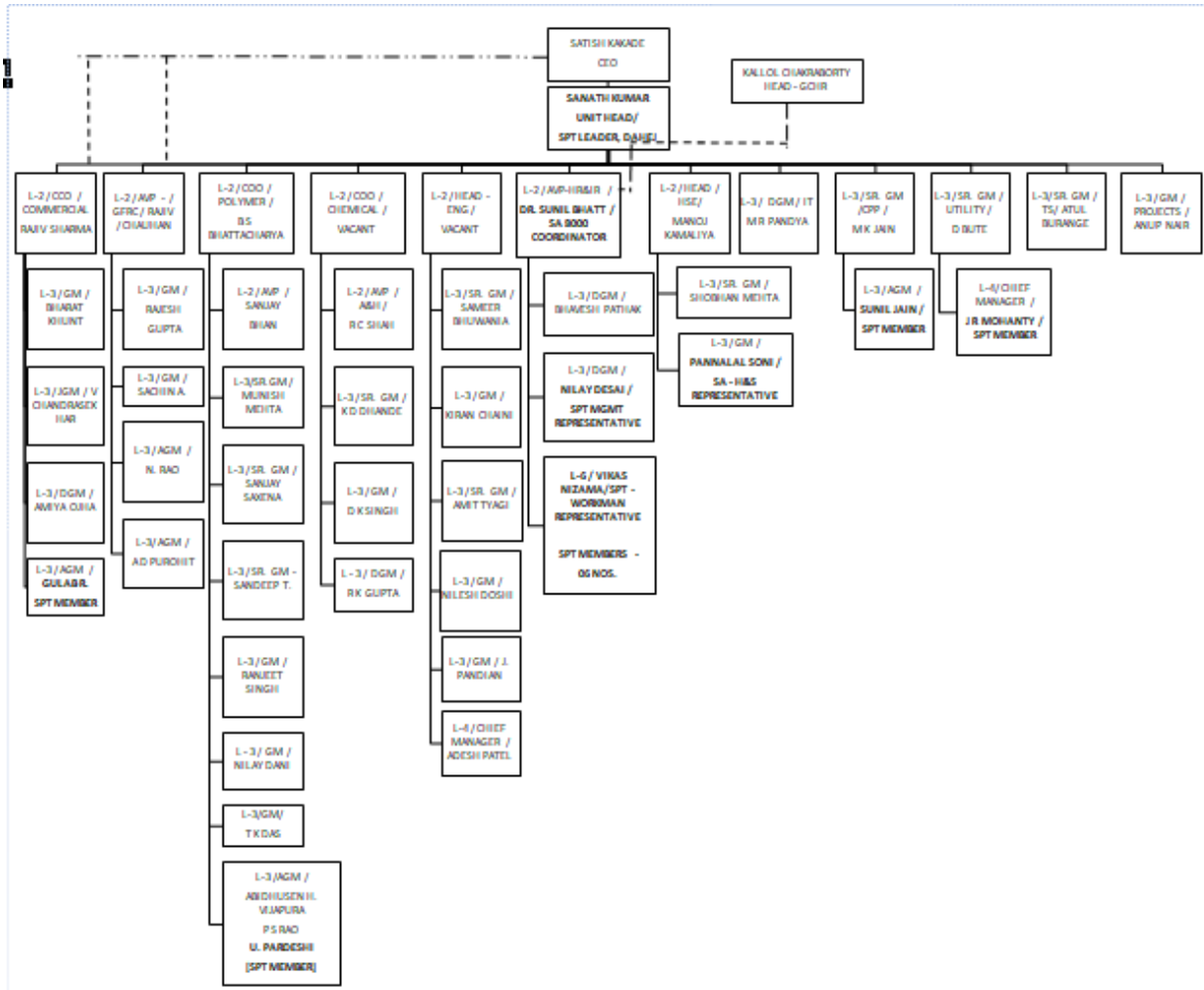
Note: The concerned departmental heads maintain the organogram and description of responsibilities of personnel, below the levels indicated here.

When a person is on leave or deputation or resigns, his functions are carried out by a person one level lower, and his authority is shifted one level above, till the time the responsibility and authority are reassigned by the Unit Head.

ORGANIZATION STRUCTURE – GFL, RANJIT NAGAR



ORGANIZATION STRUCTURE – GFL, DAHEJ



CHAPTER 6 – SOCIAL ACCOUNTABILITY REQUIREMENT - CHILD LABOUR:

The company has rolled out the following policy - **HR/74 – GUIDELINE ON CHILD LABOUR** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

6.1 PURPOSE:

Our Company, that is Gujarat Fluorochemicals Limited, GFL Americas LLC., GFL GmbH, GFL GM Morocco and IWL, IWISL, IRL 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.

6.2 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.

In addition, this policy is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973). According to this convention, the word “Child” is defined as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing countries, the lower age will apply.

This Policy also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

6.3 IMPLEMENTATION

- i. 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.
- ii. 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.
- iii. 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.

- iv. 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.

6.4 LABOUR FORCE REGISTER

The Company shall maintain documentation for every employee verifying the worker's date of birth. Supplier and Contractors must use appropriate assessment methods as per local practice and law where such official documents are not available.

6.5 MONITORING

All suppliers are obliged to keep the Company informed at all times about all places of production (including their sub-contractors). Any undisclosed production centres found would constitute a violation of this code of conduct.

Through the General Purchasing Conditions for the supply of products to the Company, the company has reserved the right to make unannounced visits at any time to all places of production (including their sub-contractors) for goods intended for supply to the company. The Company furthermore reserves the right to assign, at its sole discretion, an independent third party to conduct inspections in order to ensure compliance with the company's Child Labour policy.

6.6 REMEDIATION

Where, following inspections at supplier's premises, or through any other sources of information, company personnel become aware of the use of child labour within the company or by its suppliers or sub suppliers, they immediately shall check their IDs as part of routine document check process without raising the alarm.

The supplier and the Company shall agree on a corrective action plan, which may comprise the following actions:

- i. Collate a list of all potential child labourers and young workers. Remove the children from all work immediately ensuring children are in safe place.
- ii. Obtain contact details of child and parents/guardian (contact number, address) wherever possible.
- iii. Clarify the true identity and age of the child. Review age documents of the child and verify they are genuine.
- iv. Understand the children's desires and explore the opportunities for them to re-enter education. Ensure they agree to participate in the remediation plan by explaining the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age.
- v. Provide free food and safe accommodation to the child until the remediation plan is operational. Arrange payment of stipend to the child during the exploratory phase and throughout the remediation plan.
- vi. Whether the child contributes to the livelihoods of their family or they are self-dependent, his or her wage should continue be paid until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labor).
- vii. Seek advice and help from a recognized local non-governmental organization that deals with child labour or the welfare of children.
- viii. Develop a remediation plan that secures the children's education and protects their economic well-being, in consultation with the Company representatives and where possible a local NGO, and in consultation with and respecting the views of the child and parents/guardian.
- ix. Document all actions and obtain signed agreements from the parent/guardian of each child and all parties to the remediation setting out the elements of each child's remediation programme and duties of each party in ensuring the success of the remediation.
- x. Ongoing support and monitoring of progress of the remediation programme to ensure that it continues to benefit the child he or she reaches working age. This includes monitoring the child progress at school, exam

results, school reports, discussions with teachers etc. Home visits on regular basis on their hopes, fears and ambitions. Regular payment of stipend, school fees and any other expenses.

- xi. Develop processes to prevent recurrence and maintain records as per Register of Child Labour Remediation (Annexure II)

6.7 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 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.

6.7.1 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:

1. Chief Executive Officer of the Business
2. Chief Finance Officer of the Business
3. Unit Head or Site Head/Functional Head as the case may be
4. Group Chief Finance Officer
5. Head — Group Corporate Human Resources
6. 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. 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 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 Child Labour Act and other requirements as incorporated under this Statement.

6.7.2 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.

6.7.3 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 child labour must report such incident to any member of the Ethics Committee.

6.7.4 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.

6.7.5 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.

6.7.6 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 child labour or by any other official under his influence.

6.7.7 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.

6.7.8 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 child labour is not engaged etc. depending upon the outcome of the investigation, shall be undertaken.

6.8 BREACH OF THIS POLICY

Such actions shall be considered by the company as evidence that the supplier is not committed to child labour remediation:

- i. Expel any of the suspected or confirmed child labour and/or young workers
- ii. Threaten the children or their families or hamper the progress of investigation and remediation
- iii. Conceal or falsify any documentation

Violation of this policy or the refusal to cooperate shall result in disciplinary action, up to and including suspension or termination of employment with the Company.

6.9 POWER TO AMEND:

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

6.10 ETHICS LINE:

To provide employees with a platform to intimate/inform any action by any company employee which against of company policies or guidelines, we have launched the “**Ethics Line**” – a digital platform on our EIS portal.

CHAPTER 7 - SOCIAL ACCOUNTABILITY REQUIREMENT - FORCED/COMPULSORY LABOUR/BONDED LABOUR

The company has rolled out the following policy - **HR/65 – GUIDELINE ON FORCED/COMPULSORY/BONDED LABOUR PROHIBITION AT THE WORKPLACE** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

7.1 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 and IWL, IWISL, IRL, IR(J)L, 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".

7.2 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 Wind Business.

7.3 DEFINITION:

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.

7.4 POLICY:

1. 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.
2. 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.
3. 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.
4. 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.
5. 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.
6. Neither the company nor any entity supplying labour to the company shall engage in or support trafficking in human beings.
7. All employees shall be informed of the terms of their employment i.e. job description, hours of work etc.
8. The Company do not engage or support vendors & suppliers who resort to using forced labor in their operations.

9. 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 such documents for verification purposes only.

7.5 FORCED/BONDED/COMPULSORY 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.

5.1 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:

1. Chief Executive Officer of the Business
2. Chief Finance Officer of the Business
3. Unit Head or Site Head/Functional Head as the case may be
4. Group Chief Finance Officer
5. Head — Group Corporate Human Resources
6. 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. 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.

5.2 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.

5.3 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.

5.4 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.

5.5 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.

5.6 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.

5.7 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.

5.8 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.

7.6 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.

7.7 POWER TO AMEND:

1. Any change of the guideline shall be approved by the Head – Group Corporate HR.
2. 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.

7.8 ETHICS LINE:

To provide employees with a platform to intimate/inform any action by any company employee which against of company policies or guidelines, we have launched the “**Ethics Line**” – a digital platform on our EIS portal.

CHAPTER 8 - SOCIAL ACCOUNTABILITY REQUIREMENT – HEALTH & SAFETY

The Corporate Integrated Management Systems Policy for GFL is the Company's guiding document for protection of environment and ensuring safety of its employees. This policy demonstrate the Company's commitment towards improving its Environmental, Health & Safety performance in a continual manner.

The Company has an HR Operations Manual & Employee Handbook that provides guidance and policies for governing various aspects related to the Health & Safety of its employees.

CORPORATE INTEGRATED MANAGEMENT SYSTEM POLICY (Our Commitment towards Quality, Health, Safety, Environment, Sustainability, Security & Responsible Care)

Gujarat Fluorochemicals Limited, along with its subsidiaries - GFL Americas LLC., GFL GmbH, GFL GM Morocco, intends to be a market leader in the manufacturing and marketing of Caustic soda, Chlorine, Hydrogen, Chloromethanes, Polytetrafluoroethylene, Refrigerants and Fluorospeciality Chemicals. The Company is adopting the Integrated Management Systems Policy by making 'Responsible Care' an integral part in conducting business and operating facilities in a safe, environment friendly and sustainable manner and implementing its Principles by the following underlying philosophy:

1. Occupational Health & Safety

That a safe and healthy work place is built by preventing occupational injury and illnesses, eliminating hazards and reducing risks at workplace and encouraging consultation and participation by involvement of workers' representatives throughout the OH and S Management System.

2. Environment Protection

That every employee and all stakeholders in the extended supply chain is highly sensitive and committed to achieve pollution prevention, waste reduction, recycling, energy and resource conservation (water), environmental protection relevant in the context of the organization.

3. Product Quality

That products of desired quality meeting customer satisfaction are manufactured and supplied

4. Customer Satisfaction

All employees in the Company understand the need to focus on fulfilment of customer expectations as their primary objective

5. Interested Parties Expectations

That every employee of the company focuses on fulfillment of expectations of the interested parties, which includes customers, external service providers, regulatory authorities, investors, surrounding communities and employees etc.

6. Compliance Obligation

That the entire team complies with all applicable laws and other requirements that relate to quality, environment, occupational health and safety.

7. Security Management

That all assets are physically protected, inventory accounted and risk management measures are in place based on potential security risks, periodically reviewed and that all are aware of the security procedures and systems.

8. Continual Improvement

That systems and processes are continuously improved, through external benchmarking, adopting latest technologies and statistical and behavioral tools to improve safety, health, environment performance and fulfill customer expectation.

9. Learning and Development

That planned learning and developmental programmes based on the individual learning needs are an integral part of the company culture and operating system.

10. Business Integrity

That all business operations are conducted in an ethical manner and in compliance with the applicable laws and regulations including anti-corruption, bribery, fraud and with respect to human rights.

11. Leadership Commitment, Objective and Monitoring and Review

That the Corporate Leadership will have its Policies, strategic targets and objective for Safety, Health, Environment, Quality, Sustainability and Social Accountability in sync with the overall business objectives and will monitor, review and issue necessary directives issued to ensure the Company's continued commitment and exemplify felt leadership.

The above is applicable to all Contractors, Sub – contractors, Suppliers and to all Employees

Through the implementation of this Policy the Company seeks to achieve

- Long-term trust of its stakeholders
- Incident free, environmentally friendly and sustainable operation in the complete supply chain
 - Respect of neighbours and society at large

Health & Safety Standard Requirements:

S. No.	Standard Requirement	Document Reference
1	The organisation shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential health and safety incidents and occupational injury or illness arising out of, associated with or occurring in the course of work. It shall minimise or eliminate, so far as is reasonably practicable, the causes of all hazards in the workplace environment, based upon the prevailing safety and health knowledge of the industry sector and of any specific hazards.	<ol style="list-style-type: none"> 1. Occupational Health & Safety Risk Assessment and Risk Management Procedures 2. Workplace Monitoring (Form No. 37) 3. Occupational Health and Safety Manual 4. Third Party Occupational health Risk Assessment 5. Occupational Health and Safety Training Manual 6. Safety Bulletins and Learning from Incidents 7. Procedure for Consultation and Participation of workers in Occupational Health and Safety risk Management system
2	The organisation shall assess all the workplace risks to new, expectant and nursing mothers including those arising out of their work activity, to ensure that all reasonable steps are taken to remove or reduce any risks to their health and safety.	<ol style="list-style-type: none"> 1. Occupational Health and Safety Risk Assessment and Management Procedure
3	Where hazards remain after effective minimisation or elimination of the causes of all hazards in the workplace environment, the organisation shall provide personnel with appropriate personal protective equipment as needed at its own expense. In the event of a work-related injury the organisation shall provide first aid and assist the worker in obtaining follow-up medical treatment	<ol style="list-style-type: none"> 1. Procedure for Issue, Use and Maintenance of Personal Protective Equipment including its training 2. Procedure for First aid boxes and availability of trained and certified first aider
4	A Health and Safety Committee, comprised of a well-balanced group of management representatives and workers, shall be established and maintained. Unless otherwise specified by law, at least one worker member(s) on the Committee shall be by recognised trade union(s) representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers shall appoint a representative(s) as they deem appropriate. Its decisions shall be effectively communicated to all personnel. The Committee shall be trained and retrained periodically in order to be competently committed to continually improving the health and safety conditions in the workplace. It shall conduct formal, periodic occupational health and safety risk assessments to identify and then address current and potential health and safety hazards. Records of these assessments and corrective and preventive actions taken shall be kept.	<ol style="list-style-type: none"> 1. Health & Safety Committee
5	The change number to personnel, on a regular basis, effective health and safety training, including on-site training and, where needed, job-specific training. Such training shall also be repeated for new and reassigned personnel, where incidents have occurred, and when changes in technology and/or the introduction of new	<ol style="list-style-type: none"> 1. Training Calendar 2. Training Need Identification 3. Induction Training to new comers 4. On the job Occupational & Health training 5. Management of Change

	machinery present new risks to the health and safety of personnel.	
6	The organisation shall establish documented procedures to detect, prevent, minimise, eliminate or otherwise respond to potential risks to the health and safety of personnel. The organisation shall maintain written records of all health and safety incidents that occur in the workplace and in all residences and property provided by the organisation, whether it owns, leases or contracts the residences or property from a service provider.	<ol style="list-style-type: none"> 1. Occupational Health & Safety Risk Assessment Procedure 2. Occupational Health & Safety Manual 3. Third Party Occupational health & Safety Risk Assessment 4. Incident investigation, analysis and Learning Procedure 5. LFI Leaflets,

Occupational Health & Safety Guide to New and expectant mothers who are at work in GFL

1. Introduction

This leaflet is aimed at new and expectant mothers. It answers some basic Occupational Health and Safety questions you may have about carrying on working while you are pregnant or returning to work after giving birth. Being pregnant or a new mother does not prevent you from working and developing your career. In some workplaces, there are risks that may affect the health and safety of new and expectant mothers and that of their child.

2. Scope

This guide covers all the pregnant and breastfeeding women working inside the company premises which includes women working under contract also.

3. What sort of risks might you be exposed to?

You may be at risk from processes, working conditions or physical, biological and chemical agents and these risks will vary depending on your health, and at different stages of your pregnancy. Some of the more common risks might be:

- lifting/carrying heavy loads;
- standing or sitting still for long lengths of time;
- exposure to infectious diseases
- exposure to lead or exposure to toxic chemicals;
- work-related stress;
- workstations and posture;
- exposure to radioactive material;
- threat of violence in the workplace;
- long working hours;
- excessively noisy workplaces.

4. Does the risk assessment get repeated as your pregnancy progresses?

We regularly monitor and review any risk assessment as circumstances may change, particularly at different stages of your pregnancy. If you think you are exposed to a risk at work, you need to talk to us about it so that we can review the risk assessment. You may also wish to talk to safety officer.

5. Can I rearrange my hours to decrease my stress level?

If the risk assessment identifies stress as a possible risk, we remove the risk, where possible. If that is not possible, your working conditions or hours of work will be adjusted.

6. What are my maternity rights for Occupational Health & Safety?

The HSEF department (location wise) is responsible for areas relating to your health and safety, and that of your child before birth and during breastfeeding. If you feel that, even after taking so much care for your health

& safety, you are still unsafe or your may be unhealthy, you can write or communicate us in this regard. We will make sure that your work, working condition etc. will be made well safe immediate.

7. Are there specific workplace risks associated with breastfeeding?

There may be risks other than those associated with pregnancy to consider, if you plan to continue breastfeeding once you have returned to work. These depend on your working conditions and could include:

- working with organic mercury;
- working with radioactive materials;
- exposure to lead

We at GFL, assure you that none of above hazards are at our workplace. The concerned women employee have to inform us, in writing, as early as possible, that she plans to continue breastfeeding when she returns to work. We will take care for occupational health & safety of her and her new born baby. For any Help with respect to Occupational Health and Safety, please contact to :

HSEF department : 8080, 8081, 8090
OHC : 8085

8. Risk Assessment - Following risks are be taken into account:

8.1 Physical risks:

Movements and Postures, Manual handling, Shocks and vibrations, Noise, Radiation (ionizing and non-ionizing)

8.2 Biological agents: Virus, Bacteria, Pathogenic germs and infectious substances.

8.3 Chemical agents, including:

Toxic chemicals, Mercury, Antimitotic (cytotoxic) drugs, Pesticides, Carbon monoxide, Lead.

9. Working Conditions:

Facilities (including rest rooms), Mental and physical fatigue and working hours, Stress (including postnatal depression), Passive smoking, Temperature, Working with visual display units (VDUs), Working alone, Work at heights, Travelling, Violence, personal protective equipment, Nutrition must be taken into account that there could be different risks depending on whether workers are pregnant, have recently given birth, or are breastfeeding. **Pregnancy Risk Assessment Form** is to be filled for mothers who have given birth in last 6 months or for nursing mothers (**as per Annexure X – Risk Assessment Form**)

Risk Assessment

1. Generic hazards

List of generic hazards and situations	Risk	Risk Control/Avoidance Measures
Mental and physical fatigue and working hours	Long working hours, shift work and night work can have a significant effect on the health of pregnant and breastfeeding mothers. Both mental and physical fatigue is harmful	No pregnant women should be allowed to work more than eight hours which includes on hours lunch break and 1 hours additional break of 3 hours continuous work distributed 30 minutes in each half working day
Postural problems connected with the activity of new or expectant mothers	Fatigue from standing and other physical work has been associated with miscarriage, premature birth and low birth weight	Ensure that the hours, volume and pacing of work are not excessive. Ensure that seating is available where appropriate. Fatigue can be avoided or reduced by taking longer and more frequent breaks.
Work at heights	It is hazardous for pregnant workers working at heights, e.g. ladders, platforms	Managers must ensure that pregnant workers are not exposed to work at heights
Working alone	Pregnant women are more exposed to risk than others when working alone, particularly if they fall or require urgent medical attention	help and support is available when required, and that emergency procedures take into account the needs of new and expectant mothers
Occupational stress	New and expectant mothers can be particularly affected by occupational stresses e.g. through hormonal changes, financial, emotional or job insecurity, hence violence may be harmful	When completing a risk assessment, managers should take into account known stress factors and the particular medical and psychosocial factors affecting the individual woman
Standing activities	Physiological changes during pregnancy promote peripheral congestion while standing i.e. increased blood and systolic volume and dilation of blood vessels resulting in dizziness and faintness. Continuous standing (and/or walking) for long periods during the working day also contributes to an increased risk of premature childbirth	Ensure that seating is available where appropriate Constant sitting or standing are both inadvisable. It is better to alternate between the two. If this is not possible, provision should be made for breaks

Sitting activities	Pregnancy-specific changes in coagulation and mechanical compression of the pelvic veins by the uterus pose a relatively high risk of thrombosis or embolism for pregnant women. When sitting still, the venous filling in the legs increases which may cause aching and oedema. The increase in abdominal circumference can lead to muscular pain in the lumbar spine. This may be intensified by remaining in a specific position for an excessively long period of time	Constant sitting is inadvisable. Provision should be made for regular breaks
Lack of rest and other welfare facilities	Rest is important for new and expectant mothers	There may be a need for suitable facilities for the woman concerned to have access to somewhere where she can sit or lie down comfortably in privacy at appropriate intervals
Risk of infection or kidney disease as a result of inadequate hygiene facilities	Pregnant women – because of pressure on the bladder and other changes associated with pregnancy, pregnant women often have to go to the toilet more frequently and more urgently than others. Breastfeeding women – may also need to do so because of increased fluid intake to promote breast milk production	Managers should ensure that there is easy access to toilets and associated hygiene facilities, taking into account the fact that expectant and nursing mothers may need to break from their work more frequently than normal. Managers should seek further guidance if necessary.
Hazards as a result of inappropriate nutrition	Pregnant women may need more frequent meal breaks and more frequent access to drinking water or other light refreshments and may only be able to tolerate food 'little and often'. Their eating patterns may change, especially in the early stages of pregnancy in response to morning sickness and also in the later stages due to discomfort or other problems	New and expectant mothers' particular needs may be established in consultation with the individual concerned. These needs may change as pregnancy progresses
Hazard due to unsuitable or absent facilities	Access to appropriate facilities for expressing and safely storing breast milk for breastfeeding mothers, or to enable infants to be breastfed at or near the workplace, may facilitate breastfeeding by working women	Protective measures could include access to a private room, use of secure, clean refrigerators for storing expressed breast milk and time off without loss of pay or benefits to express milk or breastfeed

2. PHYSICAL AGENTS

List of agents/working conditions	Risk	Risk control measures
Shocks, vibration or movement	Regular exposure to shocks, i.e. sudden severe blow to the body or low frequency vibrations (floor buffers), or excessive movement may increase the risk of miscarriage. Long-term exposure to the risk may increase the risk of premature birth or low birth weight. Breastfeeding workers are at no greater risk than other workers	Work shall be organised in such a way that pregnant workers and those who have recently given birth are not exposed to work entailing risk arising from unpleasant vibrations of the entire body, particularly at low frequencies, microtraumas, shaking, shocks or where jolts or blows are delivered to the lower body
Noise	Prolonged exposure to loud noise may lead to increased blood pressure and tiredness. Experimental evidence suggests that prolonged exposure of the unborn child to loud noise during pregnancy may have an effect on later hearing and that low frequencies have a greater potential for causing harm.	If noise may cause a problem must ensure that workers who are pregnant, who have recently given birth or who are breastfeeding are not exposed to noise levels exceeding 85 dB(A)
Ionising radiation	Exposure to ionising radiation involves risks to the unborn child	Woman shall not allowed to work in Radiography
Non-ionising electromagnetic radiation	The possibility cannot be excluded that electromagnetic or magnetic fields, including those associated with short-wave therapy, may involve an increased risk for the unborn child.	It is advised to minimise exposure by means of health and safety measures.
Extremes of cold or heat	Pregnant women tolerate heat less well and may more readily faint or be more liable to heat stress. The risk is likely to be reduced after birth but it is not certain how quickly an improvement comes about. Exposure to heat may lead to adverse pregnancy outcomes.	Pregnant workers should not be exposed to prolonged excessive heat or cold at work.

3. BIOLOGICAL AGENTS

List of agents/working conditions	Risk	Risk control measures
Biological agents	Biological agents can affect the unborn child if the mother is infected during pregnancy. These may be transmitted across the placenta while the child is in the womb or during or after birth e.g. if the child is breast-fed. Examples of agents that might affect the child in this way are Hepatitis B and C, HIV, Herpes, syphilis, chickenpox and typhoid. For most workers the risk of infection is no higher than from living in the community but in certain occupations e.g. biomedical science, nursing, medicine, exposure is more likely.	If there is a known or suspected risk of exposure to a highly infectious agent, then it is appropriate for the pregnant worker to avoid exposure altogether.

4. CHEMICAL AGENTS

List of agents/working conditions	Risk	Risk control measures
Health Hazardous Chemicals	Substances like Toxic, Corrosive, irritant, Carcinogenic and having other health hazard are risky the pregnant women.	If there is a known or suspected risk of exposure to a such chemical agent, then it is appropriate for the pregnant worker to avoid exposure altogether.

5. WORKING CONDITIONS

List of agents/working conditions	Risk	Risk control measures
Manual handling of loads	Manual handling of heavy loads is considered to pose a risk to pregnancy, such as risk of foetal injury and premature birth. The risk depends on strain i.e. the weight of the load, how you lift and how often it occurs during work time	The changes an employer should make will depend on the risks identified in the assessment and the tasks involved. It may be possible to alter the nature of the task so that risks from manual handling are reduced for all workers, including new and expectant mothers.
Movements and postures	The nature and extent of any risks of injury or ill health resulting from movements or posture during and after pregnancy will depend on a number of factors. Hormonal changes in new and expectant mothers can affect the ligaments, increasing susceptibility to injury. Resulting injury may not be apparent until sometime after the birth.	We must ensure that workers who are pregnant, have recently given birth or are breastfeeding are not exposed to: <ul style="list-style-type: none"> o manual handling involving risk of injury o awkward movements and postures, especially in confined spaces o work at heights o where appropriate, work equipment and lifting gear should be introduced or adapted, storage arrangements altered, or workstations or job content redesigned

CHAPTER 9 - SOCIAL ACCOUNTABILITY REQUIREMENT – FREEDOM OF ASSOCIATION/COLLECTIVE BARGAINING

The company has rolled out the following policy - **HR/43 – GUIDELINE ON EMPLOYEE RELATION** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

9.1 OBJECTIVE

The Company is committed to building and sustaining a high performance organization comprising a committed, capable and productive workforce, and in so doing, shall ensure the well being of those who work with us. In managing employee relations we shall be fair and consistent, follow the law of the land and be sensitive to cultural differences. We shall not discriminate on the basis of caste, creed, religion, thoughts and beliefs.

9.2 GUIDELINE

- a. Be fair and humane in all our dealings with our employees and will respect the dignity of our employees throughout their career with us.
- b. Recruit and retain capable individuals based on merit, their suitability for the role and their integrity.
- c. Build credibility and mutual trust through constant dialogue and other employee involvement mechanisms, and shall keep them updated on business performance. We shall encourage employee participation and team work through forums like safety committee, quality circles, work committee etc.
- d. Build and sustain a positive work environment in our sites, which shall recognize business imperatives in the matters of discipline, productivity, quality and workplace/process improvements. We shall respect the employees' right to organize themselves and shall encourage mutual gains bargaining with unit based reinforcement bodies preferring bi-literalism. We shall honor all our commitments and implement all such contracts arrived at with the employees or their representatives.
- e. Strive to remunerate our employees in a fair manner based on region-cum-industry and unit/business viability and economic policy of the country, in a way that it is sustainable on a long-term basis in the face of competition. We shall drive superior delivery through mechanisms that link remuneration to performance.
- f. Focus on building knowledge, skills and attitude of our employees in order to drive continuous performance improvement and enhance their employability.
- g. Remain committed to the Safety, Health and Welfare of our employees and shall create a satisfying, empowering and stimulating work environment aimed at making work enjoyable.
- h. Strict adherence to non-employment of Child Labour.

9.3 POWER TO AMEND

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

CHAPTER 10 - SOCIAL ACCOUNTABILITY REQUIREMENT – DISCRIMINATION

The company has rolled out the following policy - **HR/68 – GUIDELINE ON EQUAL EMPLOYMENT OPPORTUNITY, CHILD LABOUR GENDER EQUALITY PROTECTION OF MINORITY RIGHTS** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

10.1 BACKGROUND:

Our Company, that is Gujarat Fluorochemicals Limited, GFL Americas LLC., GFL GmbH, GFL GM Morocco and IWL, IWISL, IRL, IR(J)L 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.

10.2 PURPOSE:

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.

10.3 POLICY FRAMEWORK:

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 action's 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.

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 behavior includes, but not limited to, the following –

- i. Insult, ridicule, swearing and shouting in personal interaction and common places, over telephone
 - ii. Aggressive gesture
 - iii. Abuse
 - iv. Threatening, including that of loss of employment, and intimidating – both verbal and non-verbal
 - v. Violent behavior like slamming the door, table banging, throwing objects, etc
 - vi. Bullying which includes, but not limited to, constant criticism at work, impossible deadlines, constantly changing targets and assignments, assigning meaningless work or no work,
 - vii. Rude, unpleasant, inappropriate, and unprofessional, impolite, discourteous behavior that displays a lack of regard for others
 - viii. Behavior 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. There shall be no recruitment of child labour. This means that any young person under 18 shall not be employed as per the ILO standard. The Company shall not allow any Contractor to engage labour below the age of 18 years.

f. 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.

10.4 GRIEVANCE REDRESSAL

The Company shall not tolerate harassment and behavior that is discriminatory or behaviors 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.

10.4.1 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. All grievances and complaints shall be taken seriously and treated with sensitivity and fairness. 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:

1. Chief Executive Officer of the Business
2. Chief Finance Officer of the Business
3. Unit Head or Site Head/Functional Head as the case may be
4. Group Chief Finance Officer
5. Head — Group Corporate Human Resources
6. Company Secretary

The Company Secretary shall be the "Company Ethics Officer" and any three members 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. 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.

10.4.2 The Company Secretary shall be the "Company Ethics Officer" and any three members 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 anti-corruption laws or this Policy.

10.4.3 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 discrimination must report such incident to any member of the Ethics Committee.

10.4.4 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 of discrimination, 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.

10.4.5 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.

10.4.6 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.

10.4.7 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.

10.4.8 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 discrimination is not practiced etc. depending upon the outcome of the investigation, shall be undertaken.

10.5 BREACH OF THIS POLICY

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behavior, she/he will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, stoppage of increment, suspension without pay, demotion or dismissal/ termination for more serious offences.

10.6 POWER TO AMEND

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

10.7 ETHICS LINE:

To provide employees with a platform to intimate/inform any action by any company employee which against of company policies or guidelines, we have launched the “**Ethics Line**” – a digital platform on our EIS portal.

CHAPTER 11 - SOCIAL ACCOUNTABILITY REQUIREMENT – DISCIPLINARY PRACTICE

The company has rolled out the following policy - **HR/75 – GUIDELINE ON DISCIPLINE & DISCIPLINARY PROCEDURE** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

11.1 POLICY AND INTENT

The Company expects all employees to conduct themselves in an appropriate manner in their day to day work, including in their dealing with colleagues, associates and external stake holders. It is expected that employee familiarize themselves with those policies and guidelines which set out expected and standards of behavior. The Company believes that employee discipline is at its best where there is a great amount of self-discipline on the part of the employees. In an ideal situation there may not be any need to enforce rules and regulations, penalties and disciplinary actions, because every employee is expected to be disciplined in the sense that he/she follows all the rules / regulations willingly. However, when an employee does not follow the rules or instructions or causes acts of indiscipline to occur, he/she requires to be disciplined. Thus, enforcement of discipline is extremely important for the long-term success of an organization and is a management prerogative.

11.2 COVERAGE

- i) This policy is applicable to all employees of Level 5 and above of Gujarat Fluorochemicals Limited, GFL Americas LLC., GFL GmbH, GFL GM Morocco and Level 6 and above in the Wind Business.
- ii) Employees in Level 6 and Level 7 of GFL and Wind Business respectively shall be covered under Standing Orders Act, 1946 and are not covered under this Guideline.
- iii) This guideline is not applicable in cases of Cardinal Safety Rule Violation.

11.3 PRINCIPLE OF DISCIPLINE

The company will observe the following principles in all Disciplinary matters:

- i. All Disciplinary matter will be treated with due confidentiality
- ii. All disciplinary matters will be dealt with as quickly as possible
- iii. In all disciplinary cases the delinquent employee will be given ample scope to present his case
- iv. Supervisor of the employee or his HOD or the person who is the complainant against an employee shall not be the enquiring officer
- v. An employee has the right to appeal to the Functional Head/CEO/ Group (Corporate Group HR)
- vi. In case of a disciplinary proceeding the principles of natural justice shall prevail.

11.4 AREAS OF INDISCIPLINE

Every employee is expected to follow a certain ways of working, company conduct codes which are by and large as under-

- i. Every employee of the Company shall at all times: -
 - a. Maintain absolute integrity.
 - b. Maintain devotion to duty; and
 - c. Conduct himself/herself at all times in a manner, which would enhance the reputation/image of the Company.
- ii. No employee shall engage himself/herself or participate in any demonstration which involves incitement to an offence.
- iii. No employee without the permission of the Company, own wholly or in part or conduct or participate in the editing or management or any newspaper or other periodical publication or participate in a radio / television broadcast / Internet posting or edit or publish a book or contribute an article or write a letter

either in his/her own name or anonymously, pseudonymously or in the name of any other person to a newspaper, periodicals, publications or internet / online broadcast except for purely literary, artistic or scientific character.

- iv. Criticism of the Company: No employee should in any radio / television broadcast / Internet postings or in any document published under his name or under any pen name or pseudonym or in any communication to the press or in any public utterances make any statement-
 - i. Which has the effect of criticism of policy or action of the Company or
 - ii. Which is capable of embarrassing the relations between the Company and the public or with Government Authorities.
- v. No employee should, except in accordance with any general or special order of the Company or in the performance in good faith of the duties assigned to him/her, communicate directly or indirectly any official document or any part thereof or information to any person to whom he/she is not authorized to communicate such document or information.
- vi. An employee of the Company shall –
 - i. Strictly abide by any law relating to intoxicating drinks or drugs in force in any area in which he/she may happen to be for the time being.
 - ii. Not be under the influence of any intoxicating drink or drug during the course of his/her duty should ensure and that the performance of his/her duties at any time is not affected in any way by the influence of such drinks or drugs.
 - iii. Refrain from consuming any intoxicating drink or drug in a public place.
 - iv. Not appear in a public place in a state of intoxication.
 - v. Should not offer any intoxicating drinks or drugs to other employees / customers, etc. or entice them into consuming intoxicating drinks or drugs.
 - vi. Not use any intoxicating drinks or drugs to the extent which adversely affects his/her efficiency/ performance of his/her duties.
- vii. No employee shall, except with the prior written sanction of the Competent Authority, engage directly or indirectly in any trade or business or undertake any other employment or negotiate for taking an employment. He/she could however with prior permission of the Competent Authority undertake honorary work of a social or charitable nature or occasional work of a literary, artistic or scientific chapter subject to the condition that his/her official duties do not thereby suffer.
- viii. No employee shall, during the normal course of business with Banks, L.I.C, etc. borrow money from or lend money to or otherwise place oneself under pecuniary obligation of any person with whom he/she has or is likely to have official dealing or permit any such borrowing, lending or pecuniary obligation in his/her name or for the benefit of any member of his/her family.
- ix. An employee of the Company should avoid habitual indebtedness and if he/she is adjudged or declared insolvent should report forthwith the facts to Corporate HR.
- x. The following acts or omissions prejudice to good order and discipline on the part of an employee shall amount to a major misconduct -
 - i. Conviction by a Court of Law for an offence involving moral turpitude.
 - ii. Theft, fraud or dishonesty in connection with the business or property of the company.
 - iii. Asking / taking or giving bribe or an illegal gratification.
 - iv. Wilful disobedience of any lawful or reasonable order of a superior involving safety of any person or property or other matter having an adverse effect on the work or wages of other employees.
 - v. Gambling within the premises of the company or any location where company personnel have been deputed to carry out the assigned duties.
 - vi. Drunkenness, riotous or disorderly behavior, during working hours, at the company premises/place of duty or conduct endangering the life or safety of any person, intimidation, physical duress, or any act subversive of discipline.

- vii. Collection of any money within the premises of the company for purposes not conducive to good order and discipline and by persons not authorized by law or if no such authority is required by law then without the sanction of the Competent Authority.
- viii. Engaging in trade or business, within the premises of the company including collection of pay-tickets given to the employees or the sale or canvassing of tickets, coupons or other tokens of any commodity or article, without the prior sanction of the Competent Authority
- ix. Holding meetings, shouting slogans, organizing processions inside the premises of the Company.
- x. Commencing, going or joining the strike in contravention of the provisions of any law for the time being in force.
- xi. Inciting or instigating others to take part or otherwise acting in furtherance of a strike in contravention of the provisions of any law for the time being in force.
- xii. Wilful slowing down in performance of work or abatement or instigation thereof
- xiii. Wilful damage to work in process or to any other property of the Company.
- xiv. Disclosure to any unauthorized person any information in regard to the processes of the Company which may come in to his possession in the course of his work.
- xv. Unauthorized absence from duty.
- xvi. Violation of the following HR Guidelines –

HR/51 – Guideline on Prevention, Prohibition & Redressal of Sexual Harassment of Women at Workplace

HR/62 – Guideline on Social Media

HR/65 – Guideline on Forced Bonded Labour Prohibition

HR/66 – Guideline on Anti Slavery and Anti Human Trafficking

HR/67 – Guideline on Protection of Human Rights

HR/68 – Guideline on Equal Employment Opportunity, Gender Equality and Protection of Human Rights

HR/69 – Guideline on Prevention of Corruption & Bribery

HR/70 – Guideline on Code of Conduct

HR/71 – Guideline on Prevention of Fraud

HR/72 – Guideline on Conflict of Interest

HR/73 – Guideline on Whistleblower

HR/74 – Guideline on Child Labour

- xi. The following acts or omissions prejudice to good order and discipline on the part of an employee shall amount to a major misconduct:

- i. Late Attendance
- ii. Absence from duty without leave or without sufficient cause, which is not a major misconduct
- iii. Refusal to work on a job of a similar nature without giving sufficient reasons for the same.
- iv. Failure to observe safety instructions, or unauthorized removal in reference to machinery, guard, fencing or other safety device installed in the premises of the establishment.
- v. Any act or omission for which deductions from the wages of an employed person are authorized by or under the payment of Wages Act.
- vi. Entering or leaving the premises of the Company except by the gate or gates appointed for the purpose.
- vii. Committing a nuisance in the premises of the Company and breach of any instructions for the systematic and efficient running and maintenance of any department.

11.5 PUNISHMENTS FOR MINOR & MAJOR MISCONDUCTS

i. Minor

- i. Warning
- ii. Fine

ii. Major

- i. Fine
- ii. Suspension

- iii. Withholding of increment
- iv. Demotion
- v. Dismissal / discharge

11.6 COMPLAINT

Immediately, after an act of indiscipline and/or misconduct is noted to have been committed by an employee, the Supervisor / shift in-charge on duty shall submit a detailed report to his Head of the Department immediately. While preparing complaint it should be borne in mind that the report being an important document, the same should be written patiently and carefully covering some of the following important points:-

- i. Date, Time, Shift and place of incident.
- ii. Name(s) of witnesses (if available) present at the scene.
- iii. Details of incident / misconduct.
- iv. Approximate loss incurred.
- v. If log book is maintained, the incident should be recorded therein.

On careful examination of the shift in-charge's report, the Head of the Department shall forward the report with his views to the HR Department for further action. The HR Department shall examine the gravity of the incident and take suitable action.

11.7 POWER TO AMEND

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

11.8 ETHICS LINE:

To provide employees with a platform to intimate/inform any action by any company employee which against of company policies or guidelines, we have launched the "**Ethics Line**" – a digital platform on our EIS portal.

CHAPTER 12 – SOCIAL ACCOUNTABILITY IN THE SUPPLY CHAIN

Gujarat Fluorochemicals Limited has taken up sustainability as key element for its business strategy and commits itself to ethical and sustainable operations and development activities. The company take ownership of environment, employees, customer, stakeholders, shareholders and society in order to achieve a sustainable and profitable long-term business growth. With this, policies and guidelines practical steps Gujarat Fluorochemicals takes to achieve supply chain sustainability.

POLICY ON SUSTAINABLE PROCUREMENT GUJARAT FLUROCHEMICALS LIMITED

12.1 BACKGROUND

Gujarat Fluorochemicals Limited has taken up sustainability as a key element for its business strategy and commits itself to ethical and sustainable operations and development activities. The company takes ownership of the environment, employees, customers, shareholders, stakeholders, and society in order to achieve a sustainable and profitable long-term business growth.

This Sustainable Procurement Policy and code of conduct for suppliers/ vendors, which applies to all purchases of goods and services, sets out how we will conduct business with our suppliers and describes the expectations we have of our suppliers regarding the way they conduct their business. Our aim is to ensure that the way business is conducted throughout the whole of our supply chain conforms to our own standards and is legally compliant. It outlines our expectations with regard to ethics, business integrity, human rights, health and safety, environment, the local community and quality of product and operations.

We expect all our suppliers to support, the principles set out within the UN Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the UN Global Compact and the UN Guiding Principles on Business and Human Rights.

We recognize that improving our procurement performance is an ongoing process and that our suppliers, both large and small, are important partners in our journey to become more sustainable. We expect our suppliers and vendors and their contractors to abide by the policy and code and help us reduce environmental and social impacts by establishing and operating state of the art standards for sustainable supply chain. a non-respect to this code may lead to discontinuation of business relationship.

12.2 OBJECTIVES

1. Sustainable Procurement objectives are to:

- a. comply with all relevant legislation and regulatory requirements
- b. promote sustainable awareness and assessment amongst suppliers and contractors
- c. procure sustainable products and services
- d. Reduce the environmental sustainability impacts of construction and refurbishment projects.
- e. Include Environmental, economic and social aspects when specifying specific good or services.
- f. include sustainable criteria when evaluating offers from potential suppliers
- g. Promote awareness of sustainable issues and considerations within the user community.
- h. Develop measures of our sustainable practice using sector standards.
- i. Use the measures developed to monitor our sustainable practice with a view to seek continual improvement.
- j. Use the results of the monitored practice to benchmark our performance against similar organizations.
- k. Analyse the benchmarked performance to identify areas of practice for improvement

Through supplier selection and direct engagement, we will favor suppliers who are:

12.2.1 Ethically Driven:

We conduct our business activities in a fair and transparent manner with honesty, integrity, high ethical & moral standards and respect for human rights. We strongly believe that high ethical standards are essential for sound business relationships. We expect our suppliers to share this commitment while conducting their business.

Business Integrity and Ethics:

- i. Conflict of Interest:
Suppliers are expected to report any conflict of interest in any business dealings with GFL that supplier is aware of to allow us the opportunity to take appropriate action. It should be disclosed if any GFL employee or professional under contract with GFL may have significant ownership or interest in a supplier's business.
- ii. Bribery, Corruption, gifts and Donations:
Suppliers in all commercial dealings with GFL or otherwise must not receive or offer to make any illegal payments, gifts, bribes, donations or other improper advantage in order to obtain unethical favours for the business. All suppliers must ensure that no action is taken to violate any applicable anti-bribery or anti-corruption laws and regulations in the locations of their operations and make every effort to eliminate all forms of corruption and bribery.
- iii. Confidentiality:
Suppliers shall safeguard and respect GFL's intellectual property; trade secrets and other confidential, proprietary and sensitive information or data at all times and shall not disclose the same. The information provided by GFL should be used only for its intended and designated purpose as decided and agreed upon between GFL and the supplier.
- iv. Anti-competitive and restrictive trade practices:
Suppliers must comply with applicable local and international laws to promote free and fair competition and to get business by offering competitive prices and innovative products.
- v. Conflict minerals:
GFL is committed to conducting its worldwide business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. Suppliers are expected not to source conflict minerals (columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives: Tantalum, tin, tungsten and gold) mined from Democratic Republic of Congo (DRC) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda linked to violations of human rights through the funding of illegal armed groups.

12.2.2 Human Rights:

- i. Forced and child labour:
Suppliers shall prohibit use of child labour at any stage of their business process. We expect that our suppliers will not employ any person below the age of 18 (or as per local law, whichever is greater). The suppliers must not use forced labour including prison or debt bondage labour, human trafficking or modern-day slavery.
- ii. Working hours and Incentives:
We expect suppliers to comply with applicable wage and hour laws, regulations and mandatory industry standards pertaining to minimum wages, overtime pay, working hours and rest periods.

iii. Equality:

Suppliers must ensure there is no discrimination in their hiring and employment practices on the basis of race, color, gender, age, nationality, religion, sexual orientation, marital status, citizenship, disability, veteran status, medical condition etc.

12.2.3 Socially focused:

We are committed towards supporting sustainable development and business practices. Sustainable practices now have grown to encompass social performance criteria as well. We believe that an organization should play a significant and beneficial role within the local community and society in general. We are contributing towards social and economic development of the communities in which we operate and expect our suppliers to take steps towards same.

12.2.4 Responsible conduct with stakeholders:i. Fair dealing with vendors/ suppliers:

We encourage our suppliers to conduct all transactions with their business partners in fair and transparent manner including fair evaluation, reasonable selection, equal opportunities, fair and free competition for all.

ii. Diversity in workforce:

We suggest that suppliers should take initiatives to have a diverse and inclusive workforce in terms of age, gender, experience, ethnicity etc.

iii. Engage and involve local communities:

We encourage our suppliers to address issues and concerns of the community impacted by operations of the supplier and minimize the impact.

iv. Health and Safety:

We expect our suppliers to adopt robust and relevant management practices in order to comply with applicable health and safety laws, rules, regulations and industry standards. The suppliers are also encouraged to conduct training and awareness activities for employees on health and safety. We also suggest suppliers to take reasonable actions to prevent accident and injuries by analyzing and minimizing risk exposure.

v. Local Community Development

We understand that our operations not only affect our own communities but also of those who are in contact of our supply chains and our suppliers. Therefore, we encourage our suppliers to undertake steps to collaborate and associate with the local community for economic and social development by providing employment, helping in eradicating poverty, helping in developing skills of local people etc. wherever relevant.

12.2.5 Green Inspired:

Environmental concerns are no more issues of tomorrow, but are real challenges that need to be addressed today. We aim at making our value chain environment friendly and responsible. We are committed to comply with the requirements of local laws and regulations related to environment in the countries and regions in which it operates and from where it sources any material, product or services. We realise that the scope and nature of operations of our suppliers vary and hence emphasis on these principles may vary accordingly.

12.2.5.1 Eco-friendly Products and Processes:

- i. Carbon emission reduction:
We suggest that our suppliers identify sources of carbon emission and make progressive efforts towards reducing carbon emissions.
- ii. Efficient water usage:
We suggest our suppliers to take opportunities where reduction in water usage should be identified and measures for water conservation.
- iii. Efficient systems and process:
Suppliers should strive towards enhancing the efficiency and performance of the equipment and processes by continual improvement, monitoring and assessment of technology. Good practices should be followed to ensure environmental resources are valued and protected.
- iv. Careful use of hazardous and toxic materials and substances:
We expect our suppliers to assess their use of hazardous and toxic material and take necessary steps to reduce it, as much as possible. Appropriate substitutes and replacements should be introduced to minimize exposure to such material.
 - i. Toxic waste management:
Toxic waste should be handled with professional guidance and mechanism should be put in place to dispose-off the waste to authorized waste processors by the suppliers. Toxic waste should not be allowed outside the premise without proper approval.
 - ii. Clean energy:
We recommend our suppliers to use renewable sources of energy wherever possible so as to become more energy efficient and energy independent. The suppliers should take steps to identify the scope of replacing conventional sources of energy with sustainable and renewable sources in their operations

12.2.5.2 Adopting Green Initiatives and Practices:

In order to monitor the environmental performance and to become environment friendly, practices to monitor and minimize environmental impact should be imbibed in organization's processes. We recommend that our suppliers inculcate such practices in their operations and start new initiatives to reduce their impact on the environment.

12.2.5.3 Quality Centred:

Ensuring quality and adherence to manufacturing and product standard is of prime importance to us.

i. Quality Management System:

We expect our suppliers to establish quality objectives, policies, manual, procedures and have in place a certified Quality Management System by competent authority like ISO. The suppliers should comply with local regulations, registrations; have trainings, management reviews and internal audits to ensure that the Quality Management System is effective.

ii. Facility and Machinery:

We expect our suppliers to give utmost importance to equipment design, installation, maintenance and ensure validation/verification of the same. The suppliers should have in place proper housekeeping and pest control to ensure hygiene, safety and security of its workforce.

iii. Manufacturing Practices and Quality Controls:

We expect our suppliers to have in place established manufacturing and packaging operations with proper maintenance of records along with process controls and finish product release programmed.

iv. Material Management:

We expect our suppliers to have in place established practices for storage, handling and transportation of raw material and to maximise the risk prevention measures through good warehousing practices and proper handling of rejected item.

12.3 IMPLEMENTATION:

We understand that our suppliers (as per our Supplier Control Plan – Annexure XI) fall under different categories in terms of their scale, the product/service they supply, and the raw materials being used by them, their organisation structure and geographies of operation. Keeping these factors in mind, we have designed the Policy in a manner that it works for the whole supplier base, although the level and type of compliance will vary depending on the type of the supplier and the principles applicable to them. All our suppliers are required to sign a declaration, confirming their willingness and implement internal systems to comply with our sustainable procurement policy. We expect our suppliers to set in place internal policies, governance structures, systems, processes and take any other relevant measures to ensure adherence with this Policy. We will work with our suppliers to identify issues that do not meet our expectations and help them in addressing the gaps identified, if any.

12.4 GFL SUPPLIER ASSESSMENT:

We have taken in account DQS services for supplier audit/ assessment through their digitalized tool- Supplier Audit Management Tool product. Any new supplier will have to fill this online questionnaire which will be provided to them by GFL. They will be assessed on the basis of social and sustainability accountability and will be scored according to their response. Decision to continue or start business with the supplier will be taken considering this score and other factors.

12.5 POWER TO AMEND:

- i. This policy is approved by the Management and any change in this policy shall have to be further management approval.
- ii. The management shall have overriding right to withdraw and/or amend the guidelines at its own discretion as it deems fit from time to time. The decision of the management shall be final and binding.

Dated – 5th September, 2019

Place – Gujarat Fluorochemicals Limited Corporate Office, Noida

Code of Conduct for Supplier

Introduction

Our company's reputation has grown constantly. Our customers, suppliers, service providers and business partners place their trust in us based on many years of reliable partnership and the solidity of an independent family enterprise, which develops dynamically and continuously improves.

We are therefore responsible for ensuring that our products and services are produced within a supply chain that complies with international standards. Therefore, we have summarized our expectations to our suppliers and service providers (GFL partners) with respect to working conditions, health and safety, environment and business ethics in the following "Supplier Code of Conduct." This code of conduct is based in particular upon the principles of the "UN Global Compact", the standards set out in the conventions of the ILO (International Labor Organization

The GFL Supplier Code of Conduct defines GFL's principles and our expectations to our GFL partners and their employees. By signing this document, GFL partners commit to acting responsibly and to abiding by the principles set out herein.

We expect our partners to ensure that their own suppliers and service providers will also adhere to and abide by the principles of this code of conduct and the standards upon which it is based. In the event that other regulations or laws impose more extensive provisions, these have priority over this code of conduct.

GFL will use this code of conduct as part of its supplier selection and evaluation procedures. GFL reserves the right to potentially end its business relationship with GFL partners if they do not adhere to the principles defined below.

Adherence to these principles throughout the entire supply chain is of great significance to GFL. We are counting on your support as part of this supply chain.

If you have any questions about this code of conduct, please refer to your GFL Procurement contact.

Working Condition

The GFL partner agrees to safeguard the human rights of its employees and to treat them with dignity and respect. This refers to all employees including part-time and migrant workers, student interns, temporary workers, full-time employees and any other form of manpower.

Free Choice of employment

There shall be no forced labor, slave labor or any other form of comparable labor. All labor must be voluntary and employees must be free to end their labor or their employment relationship at any time.

No Child Labor

The employment of children is prohibited. Those below 15 years of age (depending on national law below 14 years of age), children of school age or those that have not yet reached the minimum age for employment in the respective country shall not be employed. Employees under 18 years of age shall not perform work that could endanger their health or safety. Where this is the case there shall be special measures put in place to protect these young persons.

Working Hours

The weekly hours of work shall not exceed the respective statutory maximum. The weekly hours of work including overtime shall in any event not exceed the hours as applicable by the standard law. Emergencies and extraordinary circumstances constitute an exception. Employees shall be entitled to at least one day off per calendar week.

Wages and Employee benefits

Alongside economic circumstances, the requirements for business development and productivity, the remuneration paid to employees (employees and their family members) shall accord with all applicable national laws on remuneration, which includes laws on the minimum wage, overtime and statutory welfare benefits. Such remuneration shall furthermore enable the employees to participate in social cultural and political life.

Human Treatment

Employees shall not be subjected to disproportionate stringency or treated in an inhumane manner. This includes sexual harassment, sexual abuse, physical reprimand and physical and mental abuse. It also applies to the threat of such treatment.

Prohibition of Discrimination

The GFL partner agrees not to tolerate any unlawful harassment or discrimination within its workforce. The GFL partner's selection and employment practices, such as for advancement and remuneration or access to training opportunities, shall not discriminate against employees on the basis of race, skin color, age, gender, sexual orientation, ethnic background, disability, pregnancy, religious or political conviction, trades union membership or family status.

Freedom of Association

In line with the relevant national legislation, the GFL partner grants employees the right to form and join associations and to safeguard their interests.

Health and Safety

The GFL partner acknowledges that a safe and healthy work environment contributes to improvement in the quality of goods and services and to motivation of the workforce.

Health and Safety at Work Place

The GFL partner shall ensure that it has organization systems, processes and/ or measures in place in order to comply with national health and safety legislation.

The GFL partner shall identify, assess and take measures to eliminate potential safety risks. The employees shall be informed of potential safety risks and instructed on proper, safe behavior and the corresponding safety measures to be implemented. Should such measures not afford adequate hazard management, the employees shall be provided with suitable personal protective equipment.

Emergency Preparedness

Potential emergency situations and events shall be identified and evaluated. Their impact shall be minimized by implementing emergency plans and reporting procedures.

Environment

The GFL partner acknowledges that environmental responsibility is an integral part of product manufacture. Production processes shall be designed to prevent negative impacts on the environment and natural resources shall be conserved.

Health and Safety at Work Place

The GFL partner confirms that it has implemented systems, processes and/ or measures and has obtained the necessary approvals in order to comply with statutory national environmental regulations. The employees shall be instructed on how to mitigate environmental risks.

Hazardous Substance

Chemicals and other materials, that pose a hazard to the environment if released, shall be identified and managed in such a way that ensures their safe handling, transport, storage, use and recycling or disposal.

Regarding Substances in Product

The GFL partner shall abide by all applicable national laws and regulations and customer specifications regarding the prohibition or restriction of specific sub-stances. This includes mandatory labeling for recycling and disposal.

Business Ethics

The GFL partner and its representatives shall uphold high ethical standards in order to fulfil their social responsibilities and be regarded as successful in the market. The following principles shall apply:

Law Abiding Behavior

The GFL partner agrees to comply with all applicable national laws and other regulations in the context of its business operations at any time.

Integrity

All business interactions shall be governed by high standards of integrity. The GFL partner shall not have any tolerance towards bribery, corruption, extortion, fraud and embezzlement and shall prohibit them in any form. All business processes must be transparent and properly reflected on GFL partners' business records.

Prohibition of Improper Advantages

Bribes or other means of obtaining an illegal or improper advantage shall not be offered, accepted as a promise or received. Procedures shall be put in place to monitor and implement these requirements in order to ensure adequate compliance with anti-corruption laws.

Fair Competition (Antitrust Law)

The GFL partner shall respect fair competition and conduct every business activity in compliance with the applicable antitrust legislation and provisions.

Avoiding Conflict of Interest

Decisions shall only be taken on the basis of objective, business-related considerations and not influenced by personal interests.

Protection of Confidential Information

Business secrets and personal information shall only be used to the extent to which they are necessary and permitted and they shall be protected appropriately.

Export / Import Legislation

Applicable legislation and regulations relating to export and import control as well as customs shall be adhered to.

Discloser of Information

Information on the company's business activities, structure, financial situation and performance shall be disclosed in accordance with the applicable provisions and usual business practices in the sector. The falsification of records and misrepresentation of conditions and practices in the supply chain are not acceptable.

Intellectual Property

Intellectual property rights shall be respected; transfer of technology and know-how must be done in a manner that protects intellectual property rights.

Responsible Procurement of Raw Material

The GFL partner shall adopt appropriate measures which ensure to the best of its knowledge and belief that raw materials used in the manufacture of its products (tantalum, tin, tungsten, gold, etc.) do not directly or indirectly serve as means to finance or support armed groups that commit serious human rights violations. The GFL partner shall exercise due diligence with respect to the origin and chain of custody of such minerals and shall disclose these precautionary measures to GFL upon request.

By signing this document the GFL partner agrees to act responsibly and to adhere to the stated principles. We also confirm to ensure the adherence to these principles by our suppliers and service providers.

CHAPTER 13 - SOCIAL ACCOUNTABILITY REQUIREMENT – WORKING HOURS

The company has rolled out the following policy – **HR/52 - GUIDELINE ON WORKING HOURS, LATE ATTENDANCE & EXTENDED ALTERNATE SATURDAYS OFF FOR GFL** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

13.1 OBJECTIVE:

The Management is pleased to announce the alternate Saturday extended weekend and flexi -timing system for its employees working in specific offices with effect from 12th May 2014. The intent of this change is to facilitate better work life balance of employees and at the same time encourage punctuality and discipline in regularity of attendance.

13.2 COVERAGE:

This policy is applicable to all employees across the following locations:

- Corporate Office, Noida
- Vadodara Office
- Mumbai and Thane Office
- Chennai Office
- Hyderabad Office

13.3 WORKING HOURS, LATE COMING AND WEEKLY OFF:

- i. All offices shall have all Sundays and the second and fourth Saturdays in a month as weekly rest days.
- ii. The working hours shall be from 9:30 AM to 6:00 PM with a flexitime of half an hour with an 8.5 hour work schedule including 0.5 hour lunch break. There shall be no “grace period” in view of the half hour of flexi timing as stated.
- iii. For marking of attendance all employees shall use the Biometric / Face reader Attendance Marking System. It is expected that all employees shall be punctual as a matter of self-discipline. However, in case of an employee coming to work after 10:00 AM, he/she shall be marked late. An employee who comes thrice late in a month shall be subjected to a deduction equivalent to his/her half day’s salary. For the calculation of a days’ salary the Gross Monthly Salary of an employee shall be divided by 30.
- iv. It may so happen that an employee comes to office late after attending outdoor assignment. In such case the employee concerned shall keep the HR function informed about such assignment proactively. Such employees can however mark their On-duty (OD) through the on - line attendance and leave management system.
- v. The Lunch Break shall be of half an hour and employees can take this break between 1:30 PM to 2:30 PM on a staggered basis. Going out of the office premises during the Lunch Break is not encouraged and employees are advised to strictly adhere to the lunch timings and the lunch period.

13.4 OTHER CONDITIONS:

- i. As a process all CL and PL shall have to be pre-sanctioned through the on - line attendance and leave management system. Mere application of leave shall not be construed as approval of leave.
- ii. Employees in International Marketing, due to their nature of work, are required to travel extensively and frequently for long duration of time which keeps them away from home. For employees in International marketing, any Saturday Off lost due to their travel internationally shall be compensated and a Compensatory Off can be availed by them only with the prior approval of the HOD/CEO, immediately before departure or immediately after return.

13.5 POWER TO AMEND:

In case of business exigencies, the Management reserves the discretion to withdraw these changes and revert to the existing system.

Working hours of GFL- Dahej**Attendance :**

- The attendance is done via Biometric System. This attendance & online leave system shall be applicable to all the employees. It is essential for all the employees to mark their presence by punching twice a day – one while entering & the other while exiting company premises.
- For monitoring of punctuality, the availability of the employee at his workstation shall be reckoned and not the time when he has marked his attendance in the Biometric Attendance Monitoring system.
- In a continued case of habitual late coming, the employee concerned shall make himself liable to disciplinary action as deemed fit. However, it is noted that since all our employees are responsible enough so far as office discipline is concerned and exemplify the highest order of self-discipline, such action may not be required ever.
- The employee has to apply online through pay-guru and intimate to the Time Office in case of Outdoor Duty (OD) by submitting the OD Authorization Form duly approved by the HOD. Generally all such authorization shall reach the Time Office before the employee proceeds for outdoor duty.
- All employees are required to verify their or attendance, and if there is any discrepancy to notify to the Time Office immediately.

Working Time Details:

Shift	I	II	III	G
Shift Timings	0600 Hrs to 1400 Hrs	1400 Hrs to 2200 Hrs	2200Hrs to 0600 Hrs	0900 Hrs to 1730 Hrs
OT Rate	Double on One Day Gross Salary			NA
Working on PH Days	Double on One Day Gross Salary			
Working on National Holidays	Option 1: One Day Salary + Two Days Gross Salary Option 2: One Day Salary + One Day Leave			
Weekly Off Change	Within Three days of Original Week Off and Three Days of Duty between Two Weekly Offs.			
Shift Pattern	AA	BB	CC	Weekly Off

Working hours of GFL- Ranjitnagar**Attendance :**

- For monitoring of punctuality, the availability of the employee at his workstation shall be reckoned and not the time when he has marked his attendance in the Biometric Attendance Monitoring system.
- In a continued case of habitual late coming, the employee concerned shall make himself liable to disciplinary action as deemed fit. However, it is noted that since all our employees are responsible enough so far as office discipline is concerned and exemplify the highest order of self-discipline, such action may not be required ever.
- The employee have to apply online through payguru intimate to the Time Office in case of Outdoor Duty (OD) by submitting the OD Authorization Form duly approved by the HOD. Generally all such authorization shall reach the Time Office before the employee proceeds for outdoor duty.
- All employees are required to verify their or attendance, and if there is any discrepancy to notify to the Time Office immediately.
- All employees shall have weekly rest days after completion of 6 days working .

Working Time Details:

Shift	I	II	III	G	G1
Shift timings	07.00 am to 03.00 pm	03.00 pm to 11.00 pm	11.00 pm to 07.00 am	09.00 am to 05.30 pm	09.30 am to 06.00 pm
OT rate	double rate on one day Basic + Allowance (As per factory act)			NA	NA
Working on PH Days	double rate on one day Basic + Allowance (As per factory act)				
Working on National holidays	Option 1: One Day Salary + Two Days Gross Salary Option 2: One Day Salary + One Day Leave				
Weekly off change	Within 3 days of original weekly off and 03 days duty between two weekly off.				
Shift pattern	AA	AA	CC	Weekly off	
Shift pattern	BB	BB	CC	Weekly off	

CHAPTER 14 - SOCIAL ACCOUNTABILITY REQUIREMENT – REMUNERATION

The company has rolled out the following policy – **HR/76 - GUIDELINE ON WAGE & SALARY DETERMINATION** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

14.1 OBJECTIVE:

The objective of this Guideline is to define the principles and process of Wage and Salary determination, which is essentially the application of a systematic approach to the problem of ensuring that employees are paid in a logical, equitable and fair manner. Our Company attempts to pay competitive wages and salaries that is motivational, fair and equitable, variable with individual and Company performance and in compliance with all applicable statutory requirements.

14.2 COVERAGE:

This policy applies to all individuals worldwide working in Gujarat Fluorochemicals Limited, GFL Americas LLC., GFL GmbH, GFL GM Morocco along with the Wind Business and all affiliates and subsidiaries of the Company at all levels and grades, whether permanent, fixed-term or temporary.

14.3 PRINCIPLE OF WAGE & SALARY ADMINISTRATION

- i. The Company respects the right of personnel to a living wage and ensures that wages paid for a normal working week/ month is adequate to meet the basic needs of personnel and to provide a living wage to allow employees to earn enough income for a satisfactory standard of living.
- ii. The company shall ensure that deductions from wages are made as per the provisions of law, and that the employees wage and benefits composition are detailed clearly at the time of Appointment and regularly at the time of subsequent revision.
- iii. The company shall ensure that wages and benefits are rendered in full compliance with all applicable laws and that remuneration is rendered by cheque/bank transfer in a manner convenient to employees.
- iv. The company shall not use labour-only contracting arrangements, consecutive short-term contracts, and/or false apprenticeship schemes to avoid fulfilling its obligations to personnel under applicable laws pertaining to labour and social security legislation and regulations.
- v. While determining wage and salary the company shall follow the principle of ‘Capacity to Pay’ and ‘Region - cum-Industry’.
- vi. All wage and salaries shall be determined to maintain internal equity and shall be classified by position based on experience, responsibility, and physical and mental demands.
- vii. There shall be no discrimination regarding wage and salary due to religion, caste, sex, nationality, region.
- viii. The Company’s Pay structure shall be based on “Equal Pay for Equal Work”.

14.4 FACTORS FOR WAGE & SALARY DETERMINATION:

The following factors shall be considered while fixation of wage and salary structure:

- i. Cost of living
- ii. Region – cum – industry and market wage levels
- iii. Skills and experience
- iv. Capacity to pay and company financial condition

14.5 COMPLIANCE OF LAW OF THE LAND:

The company shall ensure that it complies with all the laws of the land related to wages and social security as mentioned below:

- i. The Payment of Wages Act, 1936
- ii. The Minimum Wages Act, 1948
- iii. The Equal Remuneration Act, 1976
- iv. The Payment of Bonus Act, 1965
- v. The Employees' Provident Scheme, 1952
- vi. The Employees' State Insurance Act, 1948
- vii. The Employee Compensation Act, 1923
- viii. The Payment of Gratuity Act, 1972

14.6 CONFIDENTIALITY OF WAGE AND SALARY INFORMATION

Salary is determined considering a large array of factors which may not be immediately apparent to every employee. As such, in an attempt to minimize any feelings of confusion or doubt in regards to the application of fairness in the levels of compensation provided to our employees, the Company adopts a clear guideline of the expectations for confidentiality.

All wage salary information is confidential and should not be disclosed for any reason, other than as required for appropriate financial reporting purposes. All employees are advised to keep their wages, benefits, bonuses and any other form of compensation confidential, and avoid providing or otherwise broadcasting this information with other employees, or with any third-party that does not have a bona fide need to know. Any unauthorized disclosure of confidential information by employees may impede our ability to effectively compete for talent, may create unnecessary conflict and disputes, and could lead to disciplinary action.

14.7 POWER TO AMEND:

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

14.8 ETHICS LINE:

To provide employees with a platform to intimate/inform any action by any company employee which against of company policies or guidelines, we have launched the **"Ethics Line"** – a digital platform on our EIS portal.

CHAPTER 15 - SOCIAL ACCOUNTABILITY REQUIREMENT – SOCIAL PERFORMANCE TEAM

SPT is overall responsible for the implementation and maintaining the adequacy of the SA 8000 requirements. SPT shall conduct a written risk assessment for all the elements of the standard, which may affect an individual, a group or whole organization, in general. SPT shall meet at regular intervals with a defined agenda to ensure healthy system implementation, The agenda includes, Follow up of Previous SPT meetings, Internal/External Monitoring Results, Inputs from Stake Holder Engagement. Discussion on any received Complaint/Suggestion or Feedback H&S Committee Minutes, Discussion of each element of the standard Output of Workers Committee Legal Compliances Status of Social Performance Indicators Adequacy of defined Policies Resource Requirements and Changes that may affect the Social Accountability Management System. SPT is also responsible for liaisioning with the statutory bodies to ensure compliance with local laws and standard requirements.

SPT shall conduct periodic monitoring of the organization to ensure adequate control and compliance with the standard requirements. **Identification and Assessment of Risks:** SPT shall identify significant risks and shall define suitable control measures for them which includes, but not limited to, Communication of Significant Risks to the affected. Applying control measure, in form of providing training and its periodic monitoring, etc.

Monitoring: The SPT shall effectively monitor workplace activities for:

- a) Compliance with this Standard;
- b) Implementation of actions to effectively address the risks identified by the SPT; and
- c) For the effectiveness of systems implemented to meet the organization's policies and the requirements of this Standard.

SPT will have the authority to collect information from or include interested parties (stakeholders) in its monitoring activities. It will also liaise with other departments to study, define, analyze and/or address any possible non-conformance(s) to the SA8000 Standard. The SPT will also facilitate routine internal audits and produce reports for senior management on the performance and benefits of actions taken to meet the SA8000 Standard, including a record of corrective and preventive actions identified. The SPT shall also hold periodic meetings to review progress and identify potential actions to strengthen implementation of the Standard.

The responsibility and authority of the personnel who perform, verify and manage the Social Accountability System are defined to ensure effective implementation and control. The organizational set up for the management of the Social Accountability System is as follows:

- a. Organizational Chart, Head office
- b. Organizational chart, Dahej
- c. Organizational Chart, Ranjitnagar
- d. Responsibility matrix
- e. CSR/ Sustainability committee (corporate, Dahej, Ranjitnagar)
- f. Responsibility matrix of committee

- g. Documentation:

Management policy and laid down methods of working, needed to achieve results expected from personnel working in a system, need to be defined, documented and communicated in an effective manner. With this objective a documented social management system based on the current version of the International Standard SA 8000 has been established. The system is documented in three tiers, consisting of Manual, Procedures and Records. Each of these is briefly defined below.

- i. Manual

The manual of the Social Accountability Management System, includes the following:

- A) The scope of the Social Accountability Management System.
- B) Documented procedures or reference to them.

C) Roles and responsibilities of personnel who form part of the system

ii. Procedure

The procedures of the Social Accountability Management System describe how the various activities needed for the effective functioning of the system are performed.

iii. Recording formats

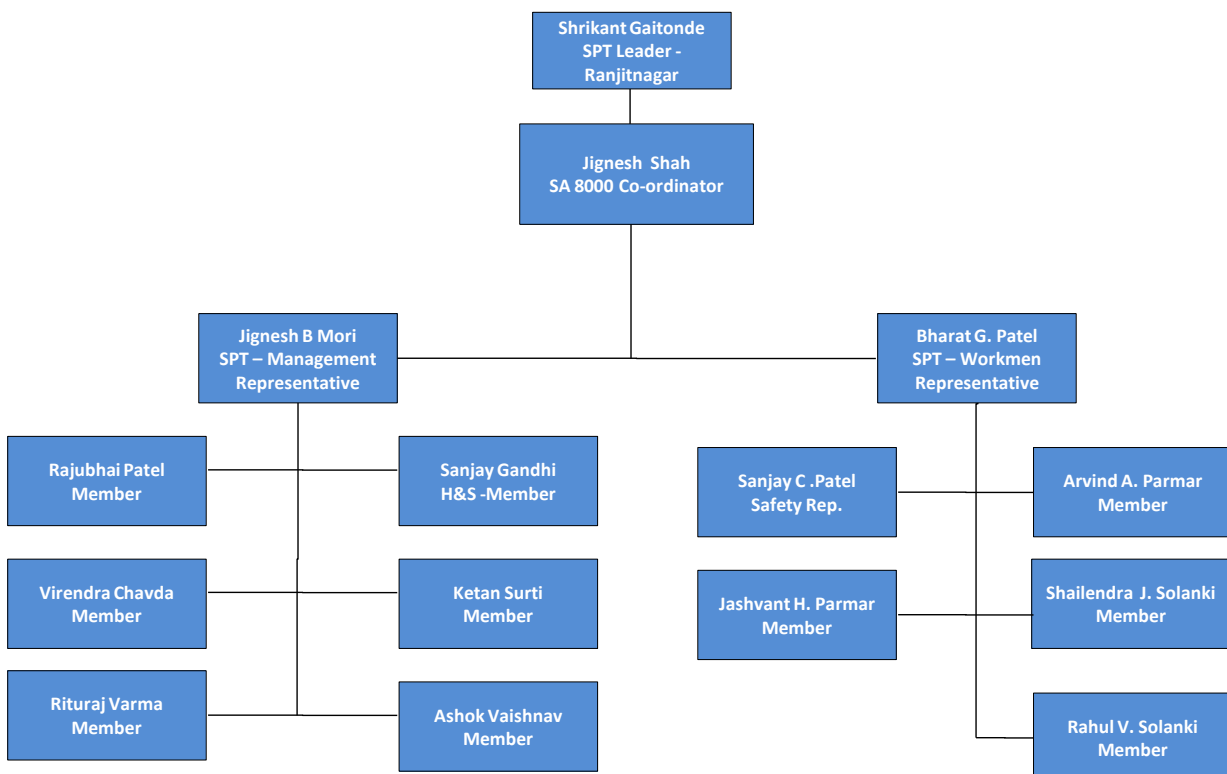
These are the forms and formats, standardized to the extent needed and form the third level of the documented system. They cover printed forms, registers, and logbooks including formats in electronic media.

Internal Involvement and Communication: The organization shall ensure that all related personnel effectively understand the requirements of SA8000 and we shall regularly communicate the requirements of SA8000 through routine communications.

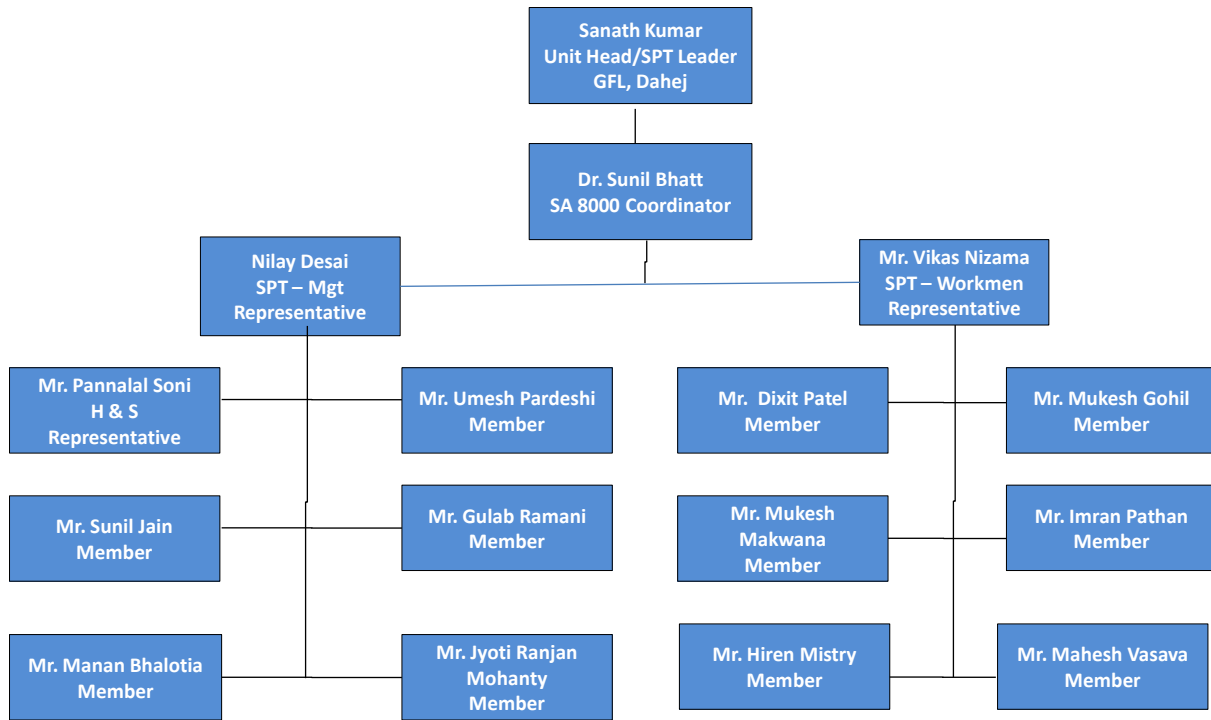
Complaint Management and Resolution: We have established a written grievance procedure that is confidential, unbiased, non-retaliatory and accessible and available to personnel and interested parties to make comments, recommendations, reports or complaints concerning the workplace and/or non-conformances to the SA8000 Standard.

We have procedures for investigating, following up on and communicating the outcome of complaints concerning the workplace and/or non-conformances to this Standard or of its implementing policies and procedures. These results shall be freely available to all personnel and, upon request, to interested parties.

SPT – Organization Chart – GFL, Ranjit nagar



SPT – Organization Chart – GFL, Dahej



RESPONSIBILITY MATRIX OF GFL, Ranjitnagar

To ensure that personnel at relevant function and level are aware of the area of responsibility for the elements of the SA 8000 Standard their responsibilities are defined in the following Responsibility Matrix:

P = Prime Responsibility, S = Secondary Responsibility		UNIT HEAD	SPT	HOD(HR)	HOD (EHS)	HOD (FSB)	HOD(REF)	HOD(EnG)	HOD(QA/QC/ R&D)	HOD(Pur)
1	S. A. REQUIREMENTS									
1.1	Child Labor		S	P	S	S	S	S	S	S
1.2	Forced & Compulsory Labor		S	P	S					
1.3	Health & Safety		S	S	S	S	S	S	S	S
1.4	Freedom of Association & Right to Collective Bargaining		S	P						
1.5	Discrimination		S	P	S	S	S	S	S	S
1.6	Disciplinary Practices		S	P						
1.7	Working Hours		S	P	S	S	S	S	S	S
1.8	Remuneration	S		P						
2	MANAGEMENT SYSTEMS									
2.1	Policy		P	S						
2.2	Management Review	P	S	S						
2.3	Management Representative	P	S	S						
2.4	SA8000 Worker Representative		P	S						
2.5	Planning & Implementation	P	P	P	P	P	P	P	P	P
2.6	Control of Supplier/subcontractor and sub-supplier		S	S	P	S	S	S	S	S
2.7	Addressing Concern & Taking Correct. Action		S	P	P	S	S	S	S	S
2.8	Outside Communication & Stakeholder engagement	P		P						
2.9	Access for Verification	P		P						
2.10	Records		P	P	S	S	S	S	S	S

List of nomination of representative –GFL- Ranjitnagar

Roles & Responsibility of SA8000 Coordinator & SA8000 (EHS) Personnel:

Sr. No.	Role and Responsibility	Name	Designation In	
			Company	SAMS
1	Senior Management Representative appointed by Management who, irrespective of other responsibilities, shall ensure that the requirements of this standard are met.	Mr. Jignesh Shah (SA 8000 Coordinator)	GM (HR & Admin)	MR (SAMS)
2	Senior Management Representative appointed by Management who is responsible for the health and safety of all personnel and accountable for the implementation of the health and safety elements	Dr Sanjay Gandhi (EHS Personnel)	Sr GM EHS	MR (HSE)

RESPONSIBILITY MATRIX OF GFL, DAHEJ

To ensure that personnel at relevant function and level are aware of the area of responsibility for the elements of the SA 8000 Standard their responsibilities are defined in the following Responsibility Matrix:

P = Prime Responsibility, S = Secondary Responsibility		UNIT HEAD	SPT	HOD(HR)	HOD (COM)	HOD (Polymer)	HOD(Chemical)	HOD(CPP)	HOD(QA/QC)	HOD(Utility)	HOD (Engineering)	HOD(HSEF)
1	S. A. REQUIREMENTS											
1.1	Child Labor		S	P	S	S	S	S	S	S	S	S
1.2	Forced & Compulsory Labor		S	P	S							
1.3	Health & Safety		S	S	S	S	S	S	S	S	S	P
1.4	Freedom of Association & Right to Collective Bargaining		S	P								
1.5	Discrimination		S	P	S	S	S	S	S	S	S	S
1.6	Disciplinary Practices		S	P								
1.7	Working Hours		S	P	S	S	S	S	S	S	S	S
1.8	Remuneration	S		P								
2	MANAGEMENT SYSTEMS											
2.1	Policy	P	S	S								
2.2	Management Review	P	S	S								
2.3	Management Representative	P	S	S								
2.4	SA8000 Worker Representative		P	S								
2.5	Planning & Implementation	P	P	P	P	P	P	P	P	P	P	P
2.6	Control of Supplier/subcontractor and sub-supplier		S	S	P	S	S	S	S	S	S	S
2.7	Addressing Concern & Taking Correct. Action		S	P	P	S	S	S	S	S	S	S

2.8	Outside Communication & Stakeholder engagement	P		S	S								
2.9	Access for Verification			P									
2.10	Records		P	P	S	S	S	S	S	S	S	S	S

Note: For full forms of the abbreviations used in the above matrix please see Annexure- – Abbreviations.

List of nomination of representative –GFL- Dahej

Roles & Responsibility of SA8000 Coordinator & SA8000 (EHS) Personnel:

Sr. No.	Role and Responsibility	Name	Designation In	
			Company	SAMS
1	Senior Management Representative appointed by Management who, irrespective of other responsibilities, shall ensure that the requirements of this standard are met.	Mr. Nilay Desai (SA 8000 Coordinator)	DGM (ER)	MR (SAMS)
2	Senior Management Representative appointed by Management who is responsible for the health and safety of all personnel and accountable for the implementation of the health and safety elements.	Mr. Pannalal Soni (EHS Personnel)	GM EHS	MR (HSE)

CHAPTER 16 – SOCIAL ACCOUNTABILITY REQUIREMENTS – MANAGEMENT SYSTEM

16.1 Policy

Top Management has defined (as mentioned below in Our Corporate Social Accountability policy) the company's Social Accountability Policy which:

- a) includes a commitment to conform to all requirements of this standard;
- b) includes a commitment to comply with national and other applicable laws, other requirements to which the company subscribes and to respect the international instruments and their interpretation (as listed in Chapter 2);
- c) includes a commitment to review its policy regularly in order to continually improve, taking in to consideration changes in legislation, in its own code of conduct requirements, and any other company requirements.
- d) is effectively documented, implemented, maintained, communicated and made accessible in a comprehensible form to all personnel, including, directors, executives, management, supervisors, and staff, whether directly employed by , contracted with or otherwise representing the company.
- e) Is publicly available in an effective form and manner to any interested parties upon request.

The Social Accountability Policy is communicated to and understood and implemented by all personnel, including directors, executives, management, supervisors, and staff, whether directly employed, contracted or otherwise representing the company. It is publicly available.

OUR CORPORATE SOCIAL ACCOUNTABILITY POLICY

At Gujarat Fluorochemicals Limited, along with its subsidiaries - GFL Americas LLC., GFL GmbH, GFL GM Morocco, our Social Accountability is based on a set of strong principles that reflects our dedication to ensuring a healthy, safe and ethical workplace that upholds the highest standards for our employees. The Company is committed to protect workers' rights and improve labour conditions and social performance within the organization and also in all its stakeholder partnerships and relationships. The Company supports the Principles of the United Nations Global Compact (UNGC), which are derived from the 1948 Universal Declaration of Human Rights.

The Company is committed to comply with all the requirements stipulated in the SA8000-2014 standard and to its principles and implement the same in effective and efficient manner, under the patronage of its employees and other stakeholders and will respect international instruments and their interpretation on social accountability issues included in various ILO Declaration and UN Conventions.

We shall strive to continually improve the ways in which we promote, communicate, and manage our Social accountability obligations with our employees, clients, supplies, sub-contractors, and the wider Communities in which we operate. We shall not knowingly conduct business with clients, suppliers, or subcontractors that fail to comply with the requirements of SA8000, and hence, undermine our standards, damage our reputation and / or threaten our commercial success.

The Management of the company is committed to conform to the following foundational elements:

1. **Child Labour:** No worker who is less than 18 years of age shall be directly or indirectly deployed in any of its operations.
2. **Forced or Compulsory Labour:** There shall be no use of forced or compulsory labour and environment of "free will" of work without any threat of punishment or retaliation shall be established.
3. **Health and Safety:** A healthy and safe working environment for all personnel employed or contracted shall be provided.

4. **Freedom of Association:** Respect and support the right to freedom of association and workers and their organizations shall not be subjected to any discrimination in the workplace.
5. **Non-Discrimination:** To provide equal opportunity to all its employees and all qualified applicants for employment without discrimination of any kind, encourages positive discrimination in favor of socially disadvantaged communities, providing potential employees fulfill its merit based criteria.
6. **Disciplinary Practices:** All personnel shall be treated with dignity and respect. All disciplinary actions are in accordance with law.
7. **Security Practices:** The security practices shall have due considerations towards human rights under all circumstances.
8. **Working Hours:** The company shall comply with applicable laws and industry standards on working hours.
9. **Compensation Practices:** The company shall ensure that its workforce is paid wages which meet or exceed the minimum wages laid out legally or as per local industry standards.
10. **Supply Chain Practices:** The Company shall promote human rights practices in its supply chain through various engagement forums, training, surveys, third-party audits and by inclusion as a criterion in vendor registration process.
11. **Management System:** The company shall continuously track its human rights and social performance through establishing effective management systems. Any complaint or grievance shall be addressed judiciously and used as input to further improve the systems and processes.

Sd/-
Satish Kakade
Chief Executive Officer

Sd/-
Prashant Ogale
Chief Operating Officer

Dated – 1 JULY, 2019

16.2 Management Review

Top management periodically reviews the adequacy, suitability, and continuing effectiveness of the company's policy, procedures and performance results vis-a-vis the requirements of this standard and other requirements to which the company subscribes. System amendments and improvements are implemented where appropriate.

A committee headed by Unit Head including nominated worker representative ensures the continuing suitability and effectiveness of the documented Social Accountability system and reviews the Social Accountability system, at an interval of not more than 6 months.

The management review meetings are chaired by Unit Head and convened by Management Representative who circulates an agenda, which includes Inputs to management review about current performance and improvement opportunities related to following:

- a) Results of audits;
- b) Customer feedback based on factory evaluations against code of conduct;
- c) Status of corrective and preventive actions;
- d) Follow-up action from earlier management reviews;
- e) Changes that could affect the social management system;
- f) Living Wages Review (Six monthly basis)

Management Representative records minute of management review meetings and circulates them to concerned persons for action with following details:

The outputs from the management review include action plan related to:

- a) improvement of the social accountability management system and its processes
- b) resource needs

Results of management reviews are recorded in the form of minutes of meeting.

16.3 Management Representative

The Company has appointed a Management Representative each for Dahej & Ranjitnagar who, irrespective of other responsibilities, ensures that the requirements of this standard are met. In addition as per SA:8000 – 2014, SPT is formed for the implementation and monitoring of SA standard and its requirements.

16.4 Non-Management Personnel (Workers') Representative

The company has provided for non-management' personnel (workers) to choose a representative each from Dahej & Ranjitnagar to facilitate communication with senior management on matters related to this standard.

16.5 Planning and Implementation

Training and capacity building are essential to ensure that workers and managers across the organization have the necessary skills and knowledge to implement SA8000. The company ensures that the requirements of this standard are understood and implemented at all levels of the organization; methods include, but are not limited to:

- a) Clear definition of all parties' roles, responsibilities, and authority.
- b) Training of new, reassigned, and/or temporary personnel upon hiring.
- c) Periodic instruction, training and awareness programs for existing personnel.
- d) Continuous monitoring of activities and results to demonstrate the effectiveness of systems implemented to meet the company's policy and the requirements of this standard.

The organization shall implement a training plan for all personnel to develop their attitudes, skills and knowledge effectively implement the SA8000 Standard as informed by the results of risk assessments. The organization shall periodically measure the effectiveness of training and record their nature and frequency.

16.6 Control of Suppliers /Subcontractors and Sub-Suppliers

The company has established and maintained appropriate procedures & record to evaluate and select suppliers/subcontractors (and where appropriate sub-suppliers') commitments to social accountability, including, but not limited to, the contractual agreement and/ or written commitments of those organizations to:

- a. Conform to all requirements of this standard and to require the same of sub-suppliers (including this clause).
- b. Participate in company's monitoring activities as requested.
- c. Identify the root cause and promptly implement corrective and preventive actions to resolve any non non-conformance identified against the requirements of this standard.
- d. Promptly and completely inform the company of any and all relevant business relationship(s) with other suppliers/sub-contractors and sub-suppliers.

16.7 The company has maintained reasonable evidence that the requirements of this standard are being met by suppliers and subcontractors within their sphere of control and influence.

16.8 In addition to the requirements of Sections 16.6 and 16.7 above, as & when the company receives, handles or promotes goods and/or services from suppliers/subcontractors or sub-suppliers who are classified as home workers, the company takes special steps to ensure that such home workers are afforded to similar level of protection to directly employed personnel under the requirements of this standard. Such special steps include but not limited to:

- (a) Establishing legally binding, written purchasing contracts requiring conformance to minimum criteria (in accordance with the requirements of this standard).
- (b) Ensuring that the requirements of the written purchasing contract are understood and implemented by home workers and all other parties involved in the purchasing contract.
- (c) Maintaining on the company premises, comprehensive records detailing the identities of home workers; the quantities of goods produced/services provided and/or hours worked by each home worker.
- (d) Frequent announced and unannounced monitoring activities to verify compliance with the terms of the written purchasing contract.

16.9 Addressing Concerns and Taking Corrective Action

The company provides a confidential means for all personnel to report non-conformances with this standard to the company management, and the worker representative. The company investigates, addresses, and responds to the concerns of personnel and other interested parties with regard to conformance/non-conformance with the company's policy and/or the requirements of this standard; the company refrains from disciplining, dismissing or otherwise discriminating against any for providing information concerning observance of the standard.

16.10 Corrective and Preventive Actions

The company implements corrective and preventive actions by identifying root causes and allocates adequate resources appropriate to the nature and severity of any non-conformance identified against the company's policy and/or the requirements of the standard.

16.11 Outside Communication & Stakeholders engagement

The company has established and maintained procedures to communicate regularly to all interested parties data and other information regarding compliance with the requirements of this document, including, but not limited to, the results of management reviews and monitoring activities. The company demonstrates its willingness to participate in dialogues with all interested stake holders, including but not limited to: workers, suppliers, sub-contractors, sub suppliers, buyers, NGOs, and local and national government officials, aimed at attaining sustainable compliance with this standard. **(See Annexure IX for List of Interested Stake holders)**

16.12 Access for Verification

In the case of announced and unannounced audits for the purpose of certifying its compliance with the requirements of this Standard, the organization *shall* fully cooperate with external auditors to determine the severity and frequency of any problems that arise in meeting the SA8000 Standard and ensures access to its premises and reasonable information required by the auditor.. The organization shall participate in stakeholder engagement in order to attain sustainable compliance with the SA8000 Standard.

16.13 Records

The company maintains appropriate records to demonstrate conformance to the requirements of this standard. The records that are required to be maintained by concerned personnel are referenced in each of the documented procedures within the Social Accountability Management System.

CHAPTER 17 - PROCEDURE FOR INTERNAL & EXTERNAL COMMUNICATION

At GFL, our employees are partners in our progress wherein the relationship is built on trust, communication and mutuality. To eliminate the boundaries between all locations and its people, the Corporate HR took a small step of launching an employee newsletter for internal communication – ‘PULSE’ which is our endeavour to stay connected.

It has not only been a platform of information sharing but also a vehicle for our people to stay connected. Today, with PULSE, every person of this company is linked with each other and is aware about the happenings in the company and what is on the horizon.

Additionally, the Company also have a policy in this regard - **HR/62 - GUIDELINE ON SOCIAL MEDIA USAGE BY COMPANY EMPLOYEES** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

17.1 OBJECTIVE

- a. With the rise of new media and next generation communications tools, the way in which Company employees can communicate internally and externally continues to evolve. While this creates new opportunities for communication and collaboration, it also creates new responsibilities for Company employees.
- b. This policy provides guidance for employees for the usage of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, micro-blogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, other sites and services that permit users to share information with others in a contemporaneous manner.

17.2 SCOPE

- i. This Policy applies to all employees including trainees, Consultants, Retainers, and who use the following:
 - Multi-media and social networking websites such as MySpace, Facebook, Yahoo! Groups, LinkedIN, YouTube, Instagram, Glass-Door, Twitter, Glassdoor, Whatsapp, Twitter, Tumblr, Snapchat, Pinterest, WeChat, etc.
 - Company Blogs Wikis such as Wikipedia and any other site where text can be posted
 - All of these activities are referred to as “Social media postings” in this Policy
- ii .It is application to GFL, IWL, IWISL, IRL.

17.3 BASIC PRINCIPLES

17.3.1 Be responsible to your work.

The company understands that employees engage in online social media activities at work for legitimate purpose and that these activities may be helpful for company affairs. However, the company encourages all employees to exercise sound judgment and common sense to prevent online social media sites from becoming a distraction at work.

17.3.2 Your local posts can have global significance.

The way that an employee answer an online question might be accurate in some parts of the world, but inaccurate (or even illegal) in others. Keep that “world view” in mind when you are participating in online conversation.

17.3.3 Know that the Internet is permanent.

Once information is published online, it is essentially a part of a permanent record, even if an employee “remove/delete” it later or attempt to make it anonymous.

17.3.4 Follow our Code of Business Conduct and all other Company policies.

Our code of business conduct provides the foundation for these online social media principles “As a representative of the company”, employee must act with honesty and integrity in all matters. This commitment is true for all forms of social media. In addition, several other policies govern an employee's behavior as a company's spokesperson in the online social media space, including the information protection policy and the insider trading policy.

17.3.5 Be mindful that you are representing the Company.

As a company representative, it is important that Employees posts convey the same positive, optimistic spirit that the company instills in all of its communications. Be respectful of all individuals, racers, religions and cultures; how you conduct yourself in the online social media space not only reflects on you – it is a direct reflection on the company.

17.4 PROCEDURES

The following principles apply to professional use of social media on behalf of the Company as well as personal use of social media when referencing the Company.

17.4.1 Only designated employees shall be authorized to create and update the social media content related to marketing, HR and other activities related to business for the Company. Being this social media is online public platform employees are not authorized to create any Company pages/parallel pages.

17.4.2 Employees shall have to understand that the Company can and will monitor employee use of social media and social networking websites, even if they are engaging in social networking or social media use away from office

17.4.3 Employees shall have adhere to the GFL Code of Conduct, Employee Handbook, and other company policies when using social media in reference to GFL .

d. Employees shall have to be aware of the effect their actions may have on their images, as well as company's image. The information that employees post or publish may be public information for a long time.

17.4.4 Employees shall not share company information through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to the Company , its employees, or customers. If an employee comments on any aspect of the company's business or any policy issue in which the company is involved and in which the employee concerned have responsibility, he must clearly identify himself as a Company employee in his postings or blog site(s) and include a disclaimer that the views are his own and not those of the Company.

17.4.5 Because an Employee is legally responsible for his postings, he may be subject to liability if his posts are found defamatory, harassing, or in violation of any other applicable law of the land or in any way may be termed as instigating and /or abetting any sentiment against the Company. He may also be liable if he make postings which include confidential or copyrighted information (music, videos, text, etc.) belonging to third parties. Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment in the Company. All of the above mentioned postings are prohibited under this policy.

17.4.6 Employees shall not publish, post or release any information that is considered confidential or not public by the Company. If there are questions about what is considered confidential, employees should check with the Human Resources Department and/or supervisor.

17.4.7 The Company may request an employee to avoid certain subjects or withdraw certain posts from a Social Media Platform if it believes that doing so shall be helpful for ensuring compliance with applicable laws, including securities regulations.

17.4.8 If a member of the news media or blogger contacts an employee about an Internet posting that concerns the business of the Company, the employee shall refer that person to the Appropriate Official of the Company. Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized spokesperson.

17.4.9 If an employee encounters a situation while using social media that threatens to become antagonistic, employees shall disengage from the dialogue in a polite manner and seek the advice of a supervisor.

k. Employees shall have to get appropriate permission before they refer to or post images of current or former employees, members, vendors or suppliers.

17.5.10 Social media use shouldn't interfere with employee's responsibilities in the Company. Computer systems are to be used for business purposes only. When using Company computer systems, use of social media for business purposes is allowed (eg: Face book, Twitter, GFL blogs and LinkedIn), but personal use of social media networks or personal blogging of online

content is discouraged during office hours and could result in disciplinary action.

17.5.11 Subject to applicable law, any online activity that violates the Company's Code of Conduct or any other company policy may subject an employee to disciplinary action, which may even lead to separation from employment.

17.5.12 If employees publish content that involves work or subjects associated with Company, a disclaimer should be used, such as this: "The postings on this site are my own and may not represent Company positions, strategies or opinions."

17.5.13 Employees shall have to keep Company related social media accounts separate from personal accounts.

17.5.14 This policy may be updated at any time without notice, and each time a user accesses a Company social networking site, the new policy will govern usage, effective upon posting. To remain in compliance, the Company that all employees review the policy at regular intervals.

17.5.15 Violation by an Employee any of the provisions of this Guideline shall subject him to strict disciplinary action. Moreover, if any social post is found to be defamatory against any other employee, Management or the Company, the Company may take appropriate legal action against such employee

17.5 POWER TO AMEND

a) Any change of the guideline shall be approved by the Head - Group HR.

b) The Management reserves the right to withdraw and / or amend the policy at its own discretion as it deems fit from time to time. The decision of the management will be final and binding.

17.6 ETHICS LINE:

To provide employees with a platform to intimate/inform any action by any company employee which against of company policies or guidelines, we have launched the "**Ethics Line**" – a digital platform on our EIS portal.

CHAPTER 18 - PROCEDURE FOR SOCIAL ACCOUNTABILITY RISK ASSESSMENT

18.1 PURPOSE:

To establish, implement, and maintain a system for identification and assessment of risks related to social accountability.

18.2 SCOPE:

All social accountability aspects of the organization.

18.3 REFERENCES:

SA8000:2014 Standard – Part IV, Clause 9.3: Identification and Assessment of Risks

18.4 AUTHORITY AND RESPONSIBILITY:

SPT Team

The SPT team is responsible for overall implementation of this procedure and authorized to provide the resources for risk assessment. They are responsible for participating in the risk assessment process.

Management Representative

The person is responsible for participating in the risk assessment process.

SPT Leader

The person is responsible for reviewing the assessment report and prioritizing the actions and authorized to provide the necessary resources for implementing the actions.

18.5 METHOD:

The Social Performance Team (SPT) conducts periodic written risk assessments once in a year (12 months interval) to identify and prioritise the areas of actual or potential non-conformance to the SA8000:2014 standard. It covers all elements of the Social Accountability Management System.

The SPT conducts these assessments on the basis of their recommended data and data collection techniques and in meaningful consultation with interested parties. Changes (or impending changes) in legislation governing labour, trade union, health and safety, environmental protection, pollution control, etc. are also looked into while carrying out this assessment.

The SPT prepares a Social Accountability Risk Assessment Report detailing the identified risks, their impact, and recommend actions to mitigate the risks. Then this report is submitted to the top management for appropriate action.

Note: This risk assessment discussed here is different from the Occupational Health & Safety Hazard Identification and Risk Assessment (HIRA). Findings of HIRA form one part of many inputs considered while conducting the Social Accountability Risk Assessment. For risk prioritization, the numerical method (risk number RN calculation) used in HIRA could be used here as well. The top management would review the report and prioritize the actions to address these risks according to their severity or where a delay in responding would make it impossible to address.

CHAPTER 19 - PROCEDURE FOR CONTROL OF SUPPLIERS/SUBCONTRACTORS/PRIVATE EMPLOYMENT AGENCIES & SUB-SUPPLIERS

19.1 PURPOSE:

To establish, implement and maintain a system for control of Suppliers / Subcontractors, Private Employment Agencies, and Sub-suppliers related to the SA8000:2014 standard.

19.2 SCOPE:

All suppliers / subcontractors (and where appropriate, sub-suppliers) and private employment agencies who supply products / services to the organization.

19.3 REFERENCES:

SA8000:2014 Standard. Clause 9.10 : Management of Suppliers and Contractors
Annexure -1 : Abbreviations

19.4 AUTHORITY AND RESPONSIBILITY:

Management Representative

The Management Representative is overall responsible for the implementation of this procedure. The MR is authorized to order the Purchase Manager to enlist / de-list suppliers on the basis of their social accountability performance related to the social aspects of the SA8000:2014 standard.

Purchase Manager

He is responsible for effective day-to-day monitoring and control of suppliers / subcontractors / private employment agencies / sub-suppliers related to the social aspects of the SA8000:2014 standard.

19.5 METHOD:

The organization has established, maintaining, and documented in writing, appropriate procedures to evaluate and select suppliers/subcontractors, private employment agencies (and, where appropriate, sub-suppliers) taking into account their performance and commitment to meet the requirements of the SA8000:2014 standard.

The organisation would conduct due diligence on its suppliers/subcontractors, private employment agencies and sub-suppliers' compliance with the SA8000 Standard. The same due diligence approach would be applied when selecting new suppliers/subcontractors, private employment agencies and sub-suppliers.

The minimum activities for the organization to fulfill the SA8000 requirement is being recorded, and they include:

- a) effectively communicating the requirements of SA8000 Standard to the senior leadership of suppliers / subcontractors, private employment agencies and sub-suppliers
- b) assessing significant risks of non-conformance by suppliers / subcontractors, private employment agencies and sub-suppliers
- c) making reasonable efforts to ensure that these significant risks are adequately addressed by suppliers / subcontractors, private employment agencies and sub-suppliers and by the organisation where and when appropriate, and prioritised according to the organisation's ability and resources to influence these entities, and

- d) establishing monitoring activities and tracking performance of suppliers/subcontractors, private employment agencies and sub-suppliers to ensure that these significant risks are effectively addressed.

The organization maintains appropriate records of commitment of suppliers / subcontractors / private employment agencies / sub-suppliers to social accountability, including, but not limited to, contractual agreements and/or the written commitment of those organisations to:

- i. Conform to all requirements of SA8000:2014 standard and to require the same of sub-suppliers
- ii. Participate in monitoring activities as requested by the organization
- iii. Identify the root cause and promptly implement corrective and preventive action to resolve any identified non-conformance to the requirements of the SA8000:2014 standard, and
- iv. Promptly and completely inform the organization of any and all relevant business relationship(s) with other suppliers / subcontractors and sub-suppliers.

Every supplier is put through an enlistment process, annual performance rating, and re-approval / re-enlistment process (every five years).

At the time of enlistment,

- We ask all suppliers / subcontractors / private employment agencies / sub-suppliers to sign a Social Accountability Commitment Declaration. If any supplier / subcontractor / private employment agency / sub-supplier refuses to sign the declaration, that entity is automatically excluded from enlistment process. In case of major suppliers / subcontractors / private employment agencies / sub-suppliers, we also make on-site assessment of their degree of compliance to SA8000 requirements (certification is not mandatory).
- The purchase manager fills-out Supplier Enlistment Form (Annexure IV) after gathering relevant data about the socially committed suppliers / subcontractors / private employment agencies / sub-suppliers and add the entity to the Master List of Approved Suppliers as 'Provisionally Enlisted'.

Change of enlistment status from 'Provisional' to 'Regular'

In case of new vendors, after examining their performance with respect to quality, delivery, and support services in three consecutive 'Trial Orders', the Purchase Manager may change the status of the enlisted suppliers / subcontractors / private employment agencies / sub-suppliers from 'Provisional' to 'Regular'.

In case of existing vendors, for direct enlistment as 'Regular' ...

- Signing of social accountability declaration would suffice in case of existing material suppliers / service providers with proven track record.
- Signing of social accountability declaration, signing of legally binding purchase contract with the organization, and submission of proof of social accountability implementation such as copies of latest remittance of Employee State Insurance (ESI) and Provident Fund (PF) would suffice in case of existing subcontractors with proven track record.

Re-enlistment

All vendors in the approved master list are subject to re-enlistment / re-approval after every FIVE years, and, the process is exactly same as that followed during enlistment.

Issuing Purchase Orders

Purchase Manager arranges for procurement of materials / services required by the organization. Depending on the urgency and order value, purchases may be made across the counter, through verbal order, by email or through formal purchase order.

Each purchase order would clearly mention the following:

- a) Name and/or part number of item ordered
- b) Quantity
- c) Component / material standard (IS, ASTM etc., if required) or preferred manufacturer
- d) Requirement of qualified personnel for making/verifying the product (if applicable)
- e) Inspection/ Quality Management System requirement at supplier's end (only if applicable).
- f) Delivery schedule
- g) Writing "TRIAL ORDER" in case of orders placed to new vendors.

Before sending the written purchase order to the suppliers, Purchase Manager verifies the same for accuracy and completeness.

Note: In case of purchases without purchase order, the suppliers' bill / cash memo is retained.

19.6 SUPPLIER / SUB-CONTRACTOR MONITORING

All approved vendors in the master list are subject to annual rating of their performance in the previous financial year with respect to quality, delivery, and support service related to the social aspects of the SA8000:2014 standard.

In case of sub-contractors, in addition to the above, the organization would conduct on-site supplier audit at a maximum interval of six months. Audit findings are recorded in Supplier Audit Note (**Annexure III**). The results of annual vendor rating and bi-annual supplier audits are discussed in the subsequent management review and suitable corrective / preventive actions taken.

19.7 SPECIAL PROVISIONS FOR HOME WORKERS

As a policy matter, the organization prefers to deal with supplier organisations rather than individuals. Furthermore, chances of employment of child labour is quite high with the home worker segment. As such, no work contract is given out to home workers at present.

Where the organisation receives, handles or promotes goods and/or services from suppliers / subcontractors or sub-suppliers who are classified as home workers, the organisation would take effective actions to ensure that such home workers are afforded a level of protection substantially equivalent to that afforded to the organisation's other workers under the requirements of the SA8000 Standard.

Such special steps include, but not be limited to:

- a) Establishing legally binding, written purchasing contracts requiring conformance to minimum criteria in accordance with the requirements of the SA8000:2014 standard
- b) Ensuring that the requirements of the written purchasing contract are understood and implemented by home workers and all other parties involved in the purchasing contract
- c) Maintaining, on the organization premises, comprehensive records detailing the identities of home workers, the quantities of goods produced, services provided, and/or hours worked by each home worker, and
- d) Frequent announced and unannounced monitoring activities to verify compliance with the terms of the written purchasing contract.

CHAPTER 20 - PROCEDURE FOR GRIEVANCE PROCEDURE FOR EMPLOYEES/CONTRACTORS

The company has rolled out the following policy - **HR/42 - GUIDELINE FOR GRIEVANCE PROCEDURE FOR EMPLOYEES/CONTRACTORS** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

20.1 OBJECTIVE

The purpose of this policy is to provide guidance in relation to the process and approach for raising and resolving staff grievances.

20.2 SCOPE

All permanent, fixed term, temporary and casual employees and Contractors.

20.3 DEFINITION

a. **Grievance** – A workplace grievance may involve any act, omission, situation or decision, related to the work environment, that an individual believes is unfair, unlawful, unjust or discriminatory. It may also include acts of workplace harassment, bullying, and occupational violence.

b. **Complainant** - The employee(s) or contractor(s) notifying a grievance relating to harassment, bullying or discrimination by an employee.

c. **Respondent** - The employee(s) or contractor(s) against whom the complaint is made.

20.4 GUIDELINE

Company is committed to providing a productive and harmonious working environment. This policy applies to grievances arising from internal work-related issues and aims to maintain effective working relationships by ensuring that grievances are handled quickly, with minimum distress and maximum protection to all parties, thereby reducing the likelihood of escalation of minor problems or grievances. A proactive approach is required by all parties to ensure a resolution is achieved. Staff and Contractors will not be disadvantaged in employment engagement conditions or opportunities as a result of lodging a grievance or complaint. Where an employee or contractor has a work related grievance that affects their work.

Performance or satisfaction, Endeavour's procedures will assist in resolving the issue to facilitate improvement within the employee's/contractors working environment. A work-related grievance is any type of problem, concern or complaint where an employee or contractor believes that he/she has received unreasonable treatment and wishes to bring the grievance to the higher authorities' attention so that the grievance is handled in accordance with the relevant policies and procedures

The grievance process is not intended to express dissatisfaction about the following:

- i. Contractual obligations such as remuneration
- ii. Disciplinary matters, i.e. unsatisfactory performance and misconduct.
- iii. Lawful & justified work instruction given by the supervisor.
- iv. Policies of the Company in force.

20.5 PRINCIPLE OF GRIEVANCE HANDLING

Grievance resolution is an integral part of managers and coordinators day-to-day responsibilities. Wherever possible, grievances should be resolved through an informal process of discussion and cooperation between the parties involved in a way that minimizes the potential for detriment to ongoing working relationships.

- i. Grievances should be treated seriously, expeditiously, sensitively and as close as possible to their source having due regard to procedural fairness, confidentiality and potential for victimization.
- ii. Concerns should be raised as early as possible after the incident relating to the complaint has occurred.
- iii. Complainants should not instigate grievances that are frivolous or malicious.
- iv. Endeavour aims to offer support for all parties and protect staff and contractors from any victimization or repercussions for reporting issues in good faith.
- v. All parties are required to participate in the grievance resolution process in good faith.
- vi. Grievances and information arising from the handling of any grievance must be treated confidentially.
- vii. The principles of natural justice will be observed throughout. This means that before a decision is taken about them, employees and contractors have the right to be informed about the nature and content of the grievance, have the right to be heard and have the right to have an unbiased decision maker.
- viii. Communication will occur regarding the process, timeframes and expected actions during the process and outcomes where necessary
- ix. Documentation will be established in relation to investigatory activities undertaken.

20.6 RESPONSIBILITIES

20.6.1. THE MANAGER

Grievance resolution is an integral part of the duties of managers responsibilities include:

- i. Applying the above principles when responding to a grievance complaint
- ii. Identifying, preventing, responding to and addressing problems in the workplace
- iii. Working with Staff to openly resolve issues through informal direct negotiations where possible, with minimal delay whilst promoting a consultative approach and a continuous improvement philosophy
- iv. Encouraging facts to be collated and thoroughly documented so that matters may be objectively investigated Responding appropriately and efficiently to grievances and managing the process according to Endeavour policies and procedures
- v. Ensuring staff understand the process for grievance resolution
- vi. Offering and obtaining advice on further action if a local resolution is not achieved
- vii. Follow-up and monitoring when issues have been resolved
- viii. Ensuring the involved parties are not victimized; and
- ix. Refer grievances which are unable to be informally resolved, are of a complex nature, which involve serious misconduct or are unlawful in nature to the Human Resource Department.

20.6.2 THE HUMAN RESOURCES DEPARTMENT

Responsibility for consulting on the management of the process where it is escalated beyond Level 1 of the procedure. Coordinating the process, ensuring that all parties are informed of the process and that the process is completed within allocated time frames.

- i. **The Complainant** is required to participate in the process in good faith and take prompt action in notifying a grievance.
- ii. **The Respondent** is required to participate in the process in good faith whilst the matter is being investigated and resolved.
- iii. **Health and Safety Officer** is responsible for investigating grievances that relate to occupational health and safety matters.

20.7 Grievance Resolution Procedure: The Following table gives the process of escalation of a grievance by a complainant. All grievances shall be given in writing by a complainant.

Level	Grievance Addressed to	Time within which resolution is required
1	Section Head	2 Days
2	HOD	2 Days
3	Site Head Project /O&M	2 Days
4	Site Head HR & Facilities	1 Days
5	Corporate HR	3 Days

If in case if the employee/contractor/subcontractor feels that the grievance is not addressed properly, he can further report/escalate it to the following accreditation bodies:

Social Accountability Accreditation Services (SAAS)

9 East 37th Street, 10th Floor
New York, NY 10016
United States of America
Telephone: +1-(212)-391-2106
Email: saas@saasaccreditation.org

Rina India Pvt. Ltd.

B-607/608, Everest Chambers, Marol Naka,
Andheri-kurla Road, Andheri East, Andheri East,
Mumbai, Maharashtra 400059
Telephone: 022 2851 5630

20.8 POWER TO AMEND

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

CHAPTER 21 - PROCEDURE FOR SOCIAL ACCOUNTABILITY INTERNAL AUDIT

21.1 PURPOSE:

To establish, implement and maintain a system for conducting periodic internal audits.

21.2 SCOPE:

All aspects of social accountability in all the departments of the organization.

21.3 REFERENCES:

SA8000:2014 Standard – Part IV, Clause 9.4 Monitoring
Annexure 1: Abbreviations

21.4 AUTHORITY AND RESPONSIBILITY:

SPT

The Social Performance Team is responsible for implementation of this procedure. The team is responsible to identify and train in-house resources (auditors) and external auditors, schedule and conduct the social accountability audits, and report the audit results to the top management. The team is authorized to ensure that agreed corrective and preventive actions are taken. They are responsible for facilitating routine internal audits conducted by the MR, and helping the MR produce reports for senior management on the performance and benefits of actions taken to meet the SA8000 Standard.

Head of Department (HODs)

They are responsible for providing facilities to carry out scheduled social accountability audit in their area, assigning responsible persons in the department to represent the department during audit, and ensuring that corrective and preventive actions agreed during audit are taken in stipulated time.

HODs are authorized to release auditee from their normal work in order to participate in social accountability audits. They are also authorized to provide resources needed for taking corrective and preventive measures to close non-conformities found in audits.

21.5 METHOD:

We have a half-yearly (interval of six months) social accountability management system internal audit programme to check the conformity of our social accountability management system to SA8000 requirements.

The Management Representative manages the social accountability internal audits.

21.5.1 Social Accountability Internal Audit Team

Social accountability internal audits are carried out by personnel from within the organization and/or by external personnel selected by the organization, to establish whether the social accountability management system has been properly implemented and maintained.

Auditors are required to understand their task and be competent to carry it out. They must also have the experience and knowledge of the relevant acts, standards, and systems they are auditing to enable them to evaluate performance and identify deficiencies. Auditors must be familiar with the SA8000 requirements applicable to the areas they are auditing and any applicable legal or other requirements.

Internal Auditors undergo training by competent faculty (preferably external faculty) before being assigned for internal audits. The audit principles and methodology described in ISO19011:2011 (auditing standard) are followed in social accountability internal audits as well.

The MR ensures that the individuals selected to conduct the social accountability management system audits are competent and are selected in a manner to ensure objectivity and impartially in the audit process. Auditors do not audit their own work.

A Master List of Social Accountability Internal Auditors (**Annexure V**) is available with the Internal auditors are chosen from the master list to carry out social accountability internal audits. If required, service of specialist auditors (external) is also made use of.

Note: Those members of the SPT who are qualified as internal auditors would participate in the internal audit process as auditors.

21.5.2 Establishing an audit programme

The following issues are considered while planning a social accountability internal audit:

- i) Communication of the audit programme to relevant parties
- ii) Establishing and maintaining a process for the selection of auditors and audit teams
- iii) Providing the resources necessary for the audit programme
- iv) Planning, coordinating and scheduling audits
- v) Ensuring that audit procedures are established implemented and maintained
- vi) Ensuring the control of records of audit activities, and
- vii) Ensuring audit follow-up and the reporting of audit results.

The audit programme is generally based on the results of risk assessments of the organization's activities and results of previous audits.

Some / all of the inputs listed below may also be used to assess compliance:

- i.the results of internal / external audits
- ii.the results of regulatory inspections
- iii.analysis of legal and other requirements
- iv.facility inspections, interviews with workers
- v.analysis of test results (water quality, air quality, humidity, noise, etc.), and
- vi.facility tours and / or direct observations.

These inputs guide the organization in determining the frequency of audits of particular activities (every six months or less or more), areas or functions and what parts of the management system should be given attention.

Our social accountability management system audits cover all areas and activities within the scope of the social accountability management system, and assess conformity to SA8000 standard.

The MR designates a Lead Auditor and a group of Auditors for each social accountability internal audit. Specialists may also be roped in as observers / technical advisors who help the auditors understand and evaluate social accountability risks in the areas to be audited.

21.6 Social Accountability Internal Audit Activities

Social accountability management system audits are conducted according to the audit programme.

An internal audit typically consists of the following activities:

- i) initiating the audit
- ii) conducting document review and preparing for the audit
- iii) conducting the audit

- iv) preparing and communicating the audit report, and
- v) completing the audit and conducting audit follow-up.

21.7 Initiating an audit

The following activities are typically done to initiate an audit:

- i. selection of appropriate auditors and audit team for the audit taking into account the need for objectivity and impartiality
- ii. defining the audit objectives, scope and criteria for the audit
- iii. determining the audit methodology
- iv. confirming audit arrangements with the auditee and other individuals who will take part in the audit

Determination of any applicable social accountability rules is an important part of this process. Sometimes, the social accountability auditors may need additional training.

21.8 Conducting document reviews and preparing for an audit

Prior to conducting an audit, the auditors review appropriate social accountability management system documents and records, and the results of previous audits. This information is also considered while making audit plans.

The documentation that may be reviewed includes:

- i) information on roles responsibilities and authorities (e.g. an organization chart)
- ii) social accountability policy statement, objectives and targets
- iii) social accountability management system audit procedures
- iv) social accountability procedures and work instructions
- v) applicable legal and other requirements, and
- vi) incident, accident, nonconformity and corrective action reports.

The amount of documentation to be reviewed and the detail provided in the plans for the audit would reflect the scope and complexity of the audit.

Audit plans cover the following:

- i) audit objectives
- ii) audit criteria
- iii) audit methodology
- iv) audit scope and /or location
- v) audit schedule, and
- vi) roles and responsibilities of the various audit parties

An audit plan provides adequate information to implement the audit. If other parties need to be included in the audit process (e.g. worker representatives), it is also included in the audit plan.

21.9 Conducting an audit

The following activities are typically part of the audit:

- i) communication during the audit
- ii) collecting and verifying information
- iii) generating audit findings and conclusions

The audit team communicates the following to the auditee:

- i) the plans for the audit (through the use of an opening meeting)
- ii) the status of the audit activities (during closing meeting)
- iii) any concerns raised during the audit (during closing meeting), and
- iv) the audit conclusions (during closing meeting).

During the audit, information relevant to the audit objectives, scope and criteria are collected using appropriate methods. The audit team ensures that a representative sample of the important activities is audited and that relevant personnel are interviewed. This can include interviews of individual workers, employee representatives and relevant external personnel, for example, labour contractors.

Also the auditors examine the relevant documentation, records and results. Special care is taken to avoid misinterpretation or misapplication of collected data, information, or other records.

Audit evidences are evaluated against the audit criteria to generate the audit findings and conclusions. Audit evidence must be verifiable, and is recorded in the **Social Accountability Internal Audit Note (Annexure VI)**.

21.10 Preparing and Communicating the Audit Report

The results of the social accountability management system audits are recorded and reported to management, in a timely manner. Care is taken to ensure that the content of the final social accountability management system audit report are clear, precise and complete. This document must be date-stamped and signed by the auditor.

An audit report typically contains the following elements:

- i) the audit objectives and scope
- ii) information about the plans of the audit (identification of the members of the auditing team and the audited representatives, dates of audit and identification of the areas subject to audit)
- iii) the identification of reference documents used to conduct the audit (e.g. SA8000 standard, social accountability procedures)
- iv) details of identified non-conformities
- v) information relating to the ability of the social accountability management system to achieve the stated social accountability policy and objectives, and
- vi) a listing of recipients for the audit report.

The results of social accountability management system audits are communicated to all relevant parties as soon as possible to allow timely corrective actions. Confidentiality is maintained while communicating the information contained within the social accountability management system audit reports.

Also, the MR prepares a clause-wise & department-wise cross tabulation of number of non-conformities in the Social Accountability Audit Summary (Annexure VII) and sends to the top management along with the detailed audit reports.

21.11 Completing the Audit and Conducting Audit Follow-Up

A review of the results is carried out in the subsequent management review meeting and effective corrective action taken, where necessary. Follow-up monitoring of prior audit findings has also been established to ensure that identified non-conformities are addressed. The top management reviews social accountability audit findings and recommendations as per the Minutes of SPT Review Meeting (Annexure VIII), and takes appropriate action as necessary within an appropriate time.

CHAPTER 22 – PROCEDURE FOR CORRECTIVE & PREVENTIVE ACTIONS

22.1 PURPOSE:

To establish, implement and maintain a system for addressing the concerns pertaining to social accountability and for taking corrective action and preventive action.

22.2 SCOPE:

It is applicable to entire Social Accountability Management System of the organization.

22.3 REFERENCES:

SA8000:2014 Standard – Part IV, Clause 9.8 Corrective and Preventive Actions
Annexure I: Abbreviations

22.4 AUTHORITY AND RESPONSIBILITY:

The Managing Director has formed a Corporate Steering committee with the objective to drive, review and provide direction to all Social Accountability, Regulatory and Compliance, Sustainability (including Safety, Health and Environment) and Responsible Care related activities and interventions across the Company. The Managing Director is authorized to take final decision on any major Social Accountability related concerns and corrective / preventive actions not resolved by others.

Social Accountability Regulatory & Sustainability (SARS) Corporate Steering Committee

The Social Accountability Regulatory & Sustainability (SARS) Corporate Steering Committee is responsible for overall implementation of this procedure. The Committee is authorized to provide resources for implementing Social Accountability related corrective / preventive actions.

Social Performance Team (SPT)

The Social Performance Team (SPT) is responsible to ensure that corrective / preventive actions are implemented effectively. The SPT is responsible for record-keeping related to corrective / preventive actions.



**GUJARAT
FLUORO-CHEMICALS
LIMITED**

(Earlier known as Inox Fluorochemicals Limited)

INOX Towers, 17, Sector 16-A, NOIDA-201301 (U.P.), INDIA

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Tel : +91-120-8148 800 E-mail: contact@gfl.co.in

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ANNOUNCEMENT

The Social Accountability, Regulatory, and Sustainability (SARS) Corporate Steering Committee is being constituted with the objective to drive, review and provide direction to all Social Accountability, Regulatory and Compliance, Sustainability (Including Safety, Health, Environment) and Responsible Care related activities and interventions across the Company

Area of operations of the Committee

1. Work place safety and hazard elimination through "responsible care" and Product Stewardship
2. Environment management and sustainability including GHG emission control
3. Workplace health and wellness
4. Social Accountability
5. Supply chain sustainability
6. Regulatory and other compliance

Overall Role of the Committee

1. Demonstrate leadership commitment in the above areas
2. Be actively engaged and provide guidance to all the teams working in their respective areas. Also create cross functional teams to drive specific strategic initiatives.
3. Identification and deployment of strategic initiative and monitor progress.
4. Draft, define, standardize and roll out Company-wide policies and procedures.
5. Set targets, define dashboard and review progress of respective sites.
6. Prioritizing actions, identify priorities and approve resources as required
7. Establish reward and recognition processes across organization
8. Design audit structure and review action plan for gap closure.

Composition of the Committee

Sl. No.	Name	Designation
1	Satish Kakade	Chairman
2	Prashant Ogale	Co-Chairman
3	V K Soni	Member
4	Navin Soni	Member
5	Sanat Kumar	Member – Representing Dahej
6	B S Bhattacharya	Member – Representing Dahej
7	S B Gaitonde	Member – Representing Ranjitnagar
8	Rajeev Jain	Member – Representing Ranjitnagar
9	Kallol Chakraborty	Secretary
10	Chandni Sharma	Coordinator

Regd. Office : Survey No. 16/3, 26-27, Ranjit Nagar, Taluka Ghogamba, Distt. Panchmahal - 389 380, GUJARAT Tel : 02175-248 103
 Vadodra Office : ABS Towers, 2nd Floor, CM Patra Road, Vadodra 390007, Gujarat, India. Tel: +91 265 6188111 / 2330067, Fax: +91 265 2310312

The Committee shall review Unit level activities with the Site team/s on a monthly basis. The Steering Committee will also meet every month with the undersigned to appraise of the progress made and gaps identified, plan of action, etc on all the related activities. The Committee shall also publish Monthly Sustainability and Social Accountability Dashboard.



V K Jain
Managing Director

Dated 19th November, 2019

22.5 METHOD:

The organisation formulates policies and procedures for the prompt implementation of corrective and preventive actions and provides adequate resources for them. The SPT ensures that these actions are effectively implemented.

After receiving information regarding an alleged SA8000 non-compliance, the organization would investigate it to find the root cause and address the problem. It would respond to the concerns of personnel and other interested parties with regard to conformance / non-conformance with the organization's policies and/or the requirements of the SA8000 standard.

The organization would promptly implement corrective and/or preventive actions, and allocate adequate resources appropriate to the nature and severity of any identified non-conformance with the organization's policy and/or the SA8000 standard. The SPT maintains records, including timelines, that list, at minimum, non-conformances related to SA8000, their root causes, the corrective and preventive actions taken and implementation results.

CHAPTER 23 – PROCEDURE FOR PRESERVATION OF DOCUMENTS

The company has rolled out the following policy - **HR/78 - GUIDELINE FOR PRESERVATION OF DOCUMENTS** in this regard. This is a part of HR Operations Manual and Employee Handbook. The policy is as follows:

23.1 Preface

The Board of Directors (the “Board”) of Gujarat Fluorochemicals Limited (the “Company”) has approved the following Policy of the Company for preservation and disposal of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”) (The Policy). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

23.2 Purpose of the Policy

The purpose of the Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

23.3 Administration

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of the Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorized to make modifications to the Documents Preservations schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

23.4 Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the **Appendix A** can be destroyed. The Administrator shall direct Employees in charge from time to time destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who re disposing of the Documents in the format prescribed at **Appendix B**.

23.5 Suspension of Documents disposal in the event of Litigation or Claims

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/ Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

23.6 Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors if the Company. This Policy shall also be posted on the web-site of the Company.

23.7 Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organized as follows:

Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A: Corporate Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Common Seal	Permanent
2	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3	Statutory Registers	Permanent
4	License and Permissions	Permanent
5	Statutory Forms except for routine compliance	Permanent
6	Scrutinizers Reports	Permanent
7	Register of Members	Permanent
8	Index of Members	Permanent
Documents to be retained for a minimum period of 8 years		
9	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10	Board Agenda and supporting documents	8 years from the date of the Board Meeting
11	Attendance Register	8 Years from the date of the Board Meeting
12	Office copies of Notice of General Meeting and related papers	8 Years from the date of the General Meeting
13	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years from the date of the Board Meeting / Committee Meeting
Miscellaneous		
14	Register of Debenture-holders, if any	15 Years after the redemption of debentures
15	Index of debenture – holders, if any	15 Years after the redemption of debentures

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for a minimum period of 8 / 17 years as given below		
2	Annual Plans and Budgets	8 years from the end of the Financial Year to which they relate to
3	Books of Accounts, Ledgers and Vouchers	17 years from the end of the Financial Year to which they relate to
4	Bank Statements	17 years from the end of the Financial Year to which they relate to
5	Investment Records	17 years from the end of the Financial Year to which they relate to
Miscellaneous		
6	General Correspondence	3 years from the end of the Financial Year to which they relate to

C: Tax Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent
2	Assessment and Appeal Orders	Permanent
Documents to be retained for a minimum period of 17 years as given below		
3	Excise / Custom Records	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
4	Tax Deducted at Source Records	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
5	Income Tax papers	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
6	Service Tax papers	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
7	Any other Direct or Indirect Tax Laws	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later

D: Legal Files and Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		

2	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
3	Legal Memoranda and Opinions including subject matter files	8 years after close of the Litigations
4	Litigation files	8 years after close of the Litigations

E: Property Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement	Permanent
2	Property Card, Index II, Ownership records issued by Government Authority	Permanent
Miscellaneous		
3	Property Insurance	8 years from the expiry of the policies

F: Project		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Project Technical Know-how Documents	Permanent
Documents to be retained for minimum period of 8 years		
2	Project Documents and Related correspondence (including any proposal of the Project and its approval)	8 years from the end of the Financial Year to which they relate to

G: Correspondence and Internal Memo		
Sr. No.	Records Type	Preservation period
Documents to be retained for minimum period of 8 /17 years		
1	Those pertaining to non-routine matters or having significant lasting consequences	17 years from the end of the Financial Year to which they relate to
Miscellaneous		
2	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; Letters of general enquiry and replies that complete cycle of correspondence; Letter of compliant requesting specific actions that have no further value after change of name or address; Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.	8 years from the end of the Financial Year to which they relate to

H: Insurance Records		
Sr. No.	Records Type	Retention period
Documents to be retained for a minimum period of 8 years		
1	Insurance Policies	8 years from the expiry of the Policies
2	Inspections Reports	3 years from the end of the Financial Year in which the claim is settled
Miscellaneous		
3	Claims records	3 years from the end of the Financial Year in which the claim is settled
4	Group Insurance Plans	3 years from the end of the Financial Year to which they pertain

I: Personnel Records		
Sr. No.	Records Type	Retention period
Documents to be retained for a minimum period of 8 years		
1	Payroll Registers	8 years from the end of the Financial Year to which they relate to
2	Bonus, Gratuity and other Statutory Records	8 years from the end of the Financial Year to which they relate to
3	Time office Records and Leave Cards	8 years from the end of the Financial Year to which they relate to
4	Unclaimed Wages Records	8 years from the end of the Financial Year to which they relate to
5	Employees Information Records	8 years from the date of separation of the concerned employee
Miscellaneous		
6	Employees Medical Record	8 years from the date of separation of the concerned employee

J: Electronic Records

1. Electronic Mail

- All e-mails received from Internal Sources are retained for 3 years and External Sources are to be retained for 8 years, from the year in which these emails were received / sent.
- Employees will strive to keep their e-mails related to business issues.
- All Emails related to business issues should be downloaded to a server or user directory on server.
- Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
- All e-mails of Employees which are important should be copied to the employees' folder.

2. Web Page Files : Internet cookies

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.

The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases document will be maintained both paper and electronic form.

CHAPTER 24 - ANNEXURES:**Annexure I - Abbreviations**

Abbreviation	Full Form
SA	Social Accountability
SAMS	Social Accountability Management System
SAMSM	Social Accountability Management System Manual
SAMSP	Social Accountability Management System Procedure Manual
ILO	International Labour Organization
GFL	Gujarat Fluorochemicals Limited
DHJ	Dahej
HSE	Health, Safety & Environment
COM	Commercial
L & SP	Longitudinal & Spiral
MAINT.	Maintenance
O	Operations
IND. TAX.	Indirect Taxation
PPC	Production, Planning & Control
QA	Quality Assurance
QC	Quality Control
MIS	Management Information System
IT	Information Technology
UH	Unit Head
MR	Management Representative
WR	Workers Representative
HOD	Head of Department
VP	Vice President
SR. VP	Senior Vice President
GM	General Manager
OD	Outside Diameter
HIRA	Hazard Identification Risk Analysis
PPE	Personal Protective Equipment
SPT	Social Performance Team
Corp. Social Mgmt. Representative	Corporate Social Accountability Management Representative

Annexure II: Register of Child Labour Remediation

S. No.	Date of Detection	Place of Detection	Full Name of Child Labourer	Date of birth / Age at the time of Detection	Name of Guardian and relationship with the child	Contact Address with PIN Code, and Phone Number (if any).	Details of Remediation Plan and the Implementation Status (with signature of Management Representative)

Annexure III: Supplier Audit Note

Audit No : Audit Date: SAN No:

Supplier Name :

Premises Audited :

Auditor(s): Auditee(s):

AUDIT OBSERVATIONS:

Sl. No:	Standard Clause Ref.:	Observations	Severity
Signature of Auditor(s):			

ROOT CAUSE AND AGREED CORRECTIVE / PREVENTIVE ACTIONS:

Sl. No:	Proposed corrective action	Due Date	Responsibility
Signature of Auditee(s):			

FOLLOW-UP AUDIT SCHEDULE
<p>On / within (date) : By:.....</p> <p><i>Follow-up audit observations of the auditor with signature:</i></p>
<p>SAN Closing: Closed on / New SAN Number & Date:</p> <p>Signature of Management Representative (MR):..... Date:</p>

Annexure IV: SOCIAL PERFORMANCE CHECKLIST

Date of Evaluation:

Period Under Evaluation: From To**Areas Covered:**

.....

1. CHILD LABOUR

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	1.1	No children present in production work areas.		
2	1.1	No fake or forged identification documents accepted during the recruitment process.		
3	1.1	Verifiable proof of age documentation is maintained for every worker.		

2. FORCED OR COMPULSORY LABOUR

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	2.4	All overtime hours are voluntary; coercion, threats, or penalties are not used to pressure personnel into overtime work.		
2	2.1	No unreasonable restraints on personnel's freedom of movement, including movement in the canteen, during breaks, and related to toilet use, access to water, access to necessary medical attention or access to religious facilities.		
3	2.1	Security measures implemented by the organisation do not intimidate or unduly restrict the movement of workers.		
4	2.1	Terms of employment outlined at the time of recruitment do not differ in any way from the terms offered during the course employment.		
5	2.1	Personnel are free from pressure, coercion, or threats that would in any way force them to accept a job or maintain employment.		

3. HEALTH AND SAFETY – Documents / Licenses / Permits / Certificates

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	<p>Licenses, permits and/or certificates are maintained as required by law and renewed in order to retain their validity.</p> <p>These documents are issued by a valid and recognized legal entity and issued to the organisation possessing them, with the appropriate location, scope and validity date.</p> <p>These documents include, for example: a. Business and operating permits; fire safety and electrical certificates; permits for equipment such as boilers, generators, elevators, fuel and chemical storage tanks; and building, emissions and waste-disposal permits.</p>		
2	3.1	A record of the maximum number of people allowed to be in the building at one time (maximum occupancy) is available. In multi-story buildings, the maximum occupancy number for each floor is publicly posted on the appropriate floor.		
3	3.1	A list of the individuals on site can be produced in real time so that an accurate head count can be performed.		

3. HEALTH AND SAFETY – Health and Safety Committee

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.5	<p>A documented procedure for the Health and Safety Committee's periodic occupational health and safety risk assessments is available.</p> <p>The risk assessment covers current and potential health and safety hazards, including ergonomic risks and geographic risks and threats, such as hurricane, seismic activity, flood and landslide.</p>		
2	3.5	The Committee is trained on incident investigation and health and safety inspection and hazard recognition.		

3	3.5	The Committee is involved in all incident investigations.		
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3. HEALTH AND SAFETY – Ergonomics

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.5	Adequate and accurate records of measures implemented to address the ergonomics risks identified by the health and safety committee's health and safety risk assessment are maintained.		
2	3.1	Workstations are designed or modified in line with the results of the health and safety risk assessment to minimize bodily strain.		

3. HEALTH AND SAFETY – Training

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.6	Personnel are trained on emergency evacuation. Fire drills take place at least once per year for all shifts. All personnel, including new personnel, know the drill procedure and consider it routine.		
2	3.6	Personnel are trained on recognition of hazards and emergencies and appropriate action.		
3	3.6	Personnel are trained on the proper operation and storage of personal protective equipment (PPE), tools, machinery and equipment.		
4	3.6	Authorized personnel are trained on tools, systems, jobs and work areas that require specific training and skills. Unauthorized personnel are trained to avoid using or visiting those tools, systems & work areas.		
5	3.6	Chemical handlers are trained on the safe use and handling of chemicals, as well as any relevant medical treatment if needed.		
6	3.6	All new personnel are trained, as noted in the indicators above, as part of their orientation training and within one month of joining the organisation.		

3. HEALTH AND SAFETY – Emergency Preparedness

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.7	<p>A documented emergency preparedness and response plan that outlines the actions that all personnel should take in case of fire and/or other emergencies (manmade and/or natural disasters) is available.</p> <p>The plan clearly defines the persons responsible for preventing, reducing the impact of, and addressing any such emergency event.</p>		
2	3.7	Automated fire safety systems (fire detection, smoke detection, alarm, fixed or mobile extinguisher systems) exist and are subject to routine checking and maintenance		
3	3.7	Evacuation plans are posted at regular intervals by the organisation in the workplace and in residences and property provided by the organisation, in the language(s) of the workers, with a clear “You are here” mark.		
4	3.7	Signs that indicate the identity of the first aid providers, fire wardens, emergency response team and the manager in charge of health and safety are posted conspicuously in the workplace.		
5	3.1	Exit doors are unlocked during working hours or are push-bar doors that can be unlocked from the inside, and are clear and unblocked. Exit doors open in the direction of travel, can be readily opened from inside the workplace by any worker without the use of keys or tools, and open wide enough to safely evacuate personnel in the case of an emergency.		
6	3.1	<p>There are enough exits to safely serve the number of workers and the height and type of building or structure. Window fire exits are not acceptable as viable fire exits.</p> <p>a. There are at least two emergency exits per floor.</p> <p>b. The maximum travel distance to an emergency exit is 200 feet or 60 meters for industrial buildings with no sprinkler systems.</p>		
7	3.1	All doors to exit hallways and staircases open in the direction of travel and can be readily opened		

		from inside by any worker without the use of keys or tools. Evacuation routes are clear and unblocked.		
8	3.1	Doors that lead to the exterior of the building that are not designated as exits are labelled as such (e.g. "Not-An-Exit" sign in the local language(s) and the language of the workers).		
9	3.1	There is one or more designated and marked assembly points outside the workplace. The assembly points are in an area that is a safe distance away from the reach of a possible fire. The area is large enough to accommodate the full number of employees and other personnel who may reasonably be on site at any given time.		
10	3.1	Emergency exit signs are visible from 30m, use letters at least 18cm high and are illuminated in bright colours or have a photo-luminescent front panel.		
11	3.1	Exit routes have emergency lighting and are marked with signs, with at least one easily seen from any area within the workplace. Battery-operated exit signs are checked regularly and batteries replaced after the manufacturers designated time period.		
12	3.1	Personnel are guided to exits or away from hazardous areas with floor markings, tape or other indications.		
13	3.1	Emergency battery lighting is provided for all stairways and where needed on exit routes.		

3. HEALTH AND SAFETY – Fire Extinguishers

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	Fully operational fire fighting equipment is maintained, regularly tested, unobstructed, clearly marked and accessible.		
2	3.6	Personnel demonstrate knowledge and understanding of the basic practical use of fire extinguishers.		

3	3.1	If fire hydrants are present, then the hoses, standpipes and all water sources, including fire pumps, are inspected and flushed at least twice per year (e.g. during fire drills).		
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3. HEALTH AND SAFETY – Alarm System

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	An alarm system exists and is audible throughout the entire organisation on every floor, including production areas, warehouses, dormitories, canteens or crèches, and any other employer-provided worker service facilities. The alarm has a distinct sound that is different from any other noise notification systems.		
2	3.1	An alternative system is available when the alarm system is undergoing maintenance		

3. HEALTH AND SAFETY – Personal Protective Equipment (PPE)

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.3	Personnel are provided with and use PPE as mandated by the organisation's occupational health and safety risk assessment.		
2	3.6	All personnel demonstrate their knowledge and understanding of: <ol style="list-style-type: none"> Which PPE is necessary for each task, operation or process; When the PPE is necessary; How to use and adjust the equipment; Limitations of the equipment; and Proper care and maintenance of the equipment 		

3. HEALTH AND SAFETY – General Working Environment

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
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1	3.1	Workplaces, including walkways and aisles, yard and storage areas, lifts and stairways, are kept clean and maintained in good condition.		
2	3.1	All primary aisles are a minimum of 1.12 meters wide or wider as stated by local law, are marked, & kept unobstructed at all times.		
3	3.1	Stairway railings of no less than 1 metre high are installed on exposed stairs where a person could potentially fall off the side of the stairway.		
4	3.7	<p>A documented procedure to prevent the ignition of fires from sources of heat, open flames, electrical sparking, hot surfaces, welding, smoking, heat or sparks is available.</p> <p>The procedure includes a mandate for adequate housekeeping to ensure that uncontrolled combustible material is removed, as well as decontamination measures.</p> <p>It mandates that hazardous material is stored and handled in a safe way and includes the following measures:</p> <ol style="list-style-type: none"> Workplaces are clean, free from dirt and dust, and are not exposed to potential ignition sources, such as cigarettes. Flammable and hazardous materials are properly stocked and kept away from ignition sources. Gas sensors are placed around gas-using and processing equipment. 		

3. HEALTH AND SAFETY – Water, Air, Noise And Temperature

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	Work areas have adequate lighting, ventilation and temperature controls.		
2	3.1	All water, inside or outside of the facility, drains properly so it does not to create a slipping hazard or a breeding ground for insects.		

3	3.8	<p>Safe and clean drinking water is free and available at all times and within a reasonable distance of all workstations.</p> <p>There is an adequate amount of potable water stations relative to the number of personnel.</p> <p>The means to drink water (i.e. cups) is safe, sanitary and available in an appropriate amount.</p>		
4	3.1	Employees are not subjected to noise levels greater than 85 decibels for more than 8 hours per day without the use of hearing protection.		
5	3.3	<p>In high noise level areas, hearing protection is provided.</p> <p>In addition, clear signage requiring the use of such protection is posted and worker usage is enforced in an appropriate manner.</p>		
6	3.1	Calibrated sound meters are used to take periodic measurements of noise levels in the organisation and record the sound levels in the various work areas.		
7	3.1	Legal requirements are met regarding worker-hearing tests in order to determine whether workers have experienced any hearing loss.		

3. HEALTH AND SAFETY – Electrical Safety

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	Electrical systems and wiring are maintained in safe condition.		
2	3.1	Electrical equipment is grounded when it is required by the distribution system that is used to prevent injury and/or fire in risky areas.		

3	3.1	The doors of all electric panels, whether on distribution boards, switches, plugs and sockets or machinery, are kept closed at all times.		
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3. HEALTH AND SAFETY – Machine Guards and Safety

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.7	<p>A documented risk assessment of machinery is available and updated when new machines are incorporated into processes.</p> <p>All machines have the necessary safety devices and guarding, as identified in the risk assessment, such as pulley guard, needle guard, eye guard and/or finger guard.</p> <p>Cutting, stamping and punching machines are required to have two-handed button operation.</p>		
2	3.6	Personnel demonstrate their knowledge and understanding of how to operate machinery in a safe and effective manner.		
3	3.7	<p>A documented maintenance plan that outlines industrial machine, equipment and wiring inspections is available.</p> <p>Adequate and accurate records are kept of machine, equipment and wiring inspections and repairs.</p>		
4	3.6	Special permits and training are required to operate high-hazard equipment such as elevators, forklift trucks, boilers and welding equipment.		

3. HEALTH AND SAFETY – Chemical And Hazardous Waste Handling And Storage

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	A documented master inventory/list of chemicals and their storage location(s) on the premises is available.		
2	3.1	<p>The material safety data sheet (MSDS) for any substance and chemical used in the organisation is easily accessible from where the chemical is stored or used.</p> <p>Chemical safety information and product labels are available in the local languages of the workers. Labels include information on</p>		

		hazardous ingredients, characteristics and properties and special precautions to follow when using, handling and storing the chemical.		
3	3.7	A documented procedure for storing chemicals in order to avoid contact between incompatible chemicals and providing for secondary containment is available.		
4	3.1	Chemical handling and storage areas have immediate access to an eyewash station and shower.		
5	3.7	A documented procedure for proper labelling of chemicals is available.		
6	3.7	A documented procedure for the proper handling and storage of hazardous waste is available		
7	3.6	Only authorized employees handle hazardous waste.		
8	3.1	Hazardous waste storage containers are separated from ordinary waste, are clearly and properly marked, and are protected from the weather and any fire risks.		
9	3.1	Hazardous waste storage containers are checked regularly for spills and secondary containment is provided to prevent direct exposure to the environment.		

3. HEALTH AND SAFETY – Chemical And Hazardous Waste Handling And Storage

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	Pre-employment medical exams, when required by law, are provided free of charge to all personnel. These exams may not include pregnancy or virginity tests.		
2	3.1	Annual occupational health checks for workers handling hazardous materials are conducted. These occupational health checks are conducted by a qualified medical professional at the organisation's expense.		

3	3.1	<p>Medical care is available on-site or the organisation is in close proximity to facilities where basic health and injury needs can be addressed.</p> <p>If there is no medical care provided on-site, the organisation has a system in place to address severe injuries when needed.</p>		
4	3.1	One properly stocked and readily accessible first aid kit is available for at least every 100 workers. The kit contains, at a minimum, basic supplies such as bandages, scissors, gloves and gauze.		
5	3.1	The locations of first aid boxes are posted with a first aid sign, which also includes the names and photographs of trained first aid personnel for each shift and an emergency contact number.		
6	3.1	In cases where first aid supplies are locked for security reasons first aid trained staff can access the supplies within 2 minutes.		
7	3.7	Adequate and accurate records of incidents and near misses maintained. These records are reviewed during the management review meeting and Health and Safety Committee meetings. These records are kept for at least two years.		

3. HEALTH AND SAFETY – Restroom Facilities

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.8	<p>An adequate number of restroom facilities are provided.</p> <p>The facilities meet local hygiene requirements and have functional toilets and sinks with running water.</p> <p>There are a sufficient number of facilities relative to the number of employees and, where practicable, facilities are separated by sex.</p>		

2	3.8	Restroom facilities are cleaned and serviced regularly.		
3	3.8	Toilet paper is free of charge. Cleansing agents or hand soap and hand towels or dryers and garbage pails are provided in all restroom facilities.		

3. HEALTH AND SAFETY – Kitchen, Cafeteria and Canteens (if available on the premises)

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.8	Kitchen, cafeteria and canteens areas operate under sanitary, safe conditions and have anti-slip floor mats.		
2	3.8	K-class fire extinguishers are provided in all kitchens (The K-class fire extinguisher works on fires caused by fats, greases and oils).		
3	3.8	Kitchen, Cafeteria and Canteens have sufficient seating to accommodate the majority of workers working at a given time. The seating is also sufficient if there is enough space for workers to eat in shifts.		
4	3.8	Kitchen, Cafeteria and Canteen staff ensure that any spoiled or questionable food is not served and is properly disposed. Staff ensures that utensils, dishes and cookware are properly sanitized after each use.		
5	3.8	Kitchen, Cafeteria and Canteen staff have a health check at least annually and/or obtain a health certificate if required by local law.		
6	3.8	All workers that handle food wear an apron, gloves and hair net and wash their hands after using restroom facilities.		
7	3.6	100% of Kitchen, Cafeteria and Canteen personnel have received training in hygienic food preparation and nutrition.		
8	3.8	The kitchen has a pest and vermin program that effectively ensures that there are no pests and vermin present.		

3. HEALTH AND SAFETY – Dormitories

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.9	Dormitories are located in a building separate from the production areas and warehouses and are well maintained.		

2	3.9	Dormitories are secure, clean and have adequate safety provisions, such as: potable water, fire extinguishers, first aid kits, unobstructed and clearly marked emergency exits with doors that cannot be locked against egress, fire alarms in working order and emergency lighting. Emergency evacuation drills are conducted at least once per year.		
3	3.9	Each dormitory floor has at least 2 accessible, unlocked, and clearly marked exits leading to the outside.		
4	3.9	The minimum amount of square footage allocated per resident is 3.7 meters per worker, or as is provided by law.		
5	3.9	Each resident has his or her own bed or mat, an area for personal items, and the ability to secure belongings.		
6	3.9	Toilets and showers provide adequate privacy and each has its own cubicle.		
7	3.9	Water usage for showering and bathing should not be restricted and/or limited to unreasonable hours of operation. Hot water is provided.		
8	3.9	Each dormitory has adequate lighting and ventilation to produce a comfortable living area.		

3. HEALTH AND SAFETY – Childcare Facilities

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	3.1	Childcare facilities are located on the ground floor, away from the production and storage areas and children do not have access to production areas.		

4. FREEDOM OF ASSOCIATION & RIGHT TO COLLECTIVE BARGAINING

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	4.1	The organisation does not propose or initiate worker elections.		
2	4.1	Worker elections are independent and freely conducted by workers for workers; worker participation in this process is voluntary.		
3	4.3	Workers indicate that worker organisations have had the opportunity to present the organisation to the workforce.		
4	4.3	Trade union representatives are allowed regular and reasonably free access to workers during workers' free time.		
5	4.1	Workers indicate that the organisation does not promote or show any bias towards any specific type of worker organisation or to workers from any specific organisation.		
6	4.3	Workers are able to access their worker representatives at an agreed upon time and place. The place is adequate for their needs and is accessible both during scheduled breaks and outside of working time.		
7	4.1	Worker organisations are permitted to post union / committee notices in conspicuous and agreed-upon places.		
8	4.1	All provisions of collective agreements are honoured.		
9	4.1	The organisation is open to dialogue with trade unions and demonstrates good faith in bargaining with trade unions.		

5. DISCRIMINATION

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	5.1	Job postings and advertisements, handbooks, leaflets, flyers, training materials, memos, posters and other communication materials are not discriminatory.		
2	5.1	Incidents of discrimination are documented, reviewed by the organisation and lead to a documented remediation plan. The remediation plan is implemented and results are part of the management review.		
3	5.1	All personnel have the same opportunity to apply for and be considered for the same jobs.		
4	5.1	All personnel are treated fairly regarding benefits, dormitory and canteen/cafeteria privileges.		

6. DISCIPLINARY PRACTICES

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	6.1	Adequate and accurate records for all cases of disciplinary action are available.		
2	6.1	Workers are informed when a disciplinary procedure has been initiated against them and have the right to participate and be heard in any disciplinary procedure against them.		
3	6.1	Workers confirm by signature or thumbprint all documented records of disciplinary action against them. This confirmation acknowledges that the workers are aware of the action, though they may not necessarily agree with the rationale, and that the workers know that such records are maintained in the organisation's personnel files.		

7. WORKING HOURS

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	7.4	Reasonable steps are taken to inform workers about the nature and expected duration of extraordinary business circumstances that may necessitate longer working hours with sufficient advance warning allow workers to accommodate this situation.		
2	7.1	Time cards, an electronic bar card system, or attendance sheets are used to measure actual working hours and break times for all workers, regardless of whether they are paid by hour, piece rate, job, or other form. The measurement system includes in and out times at the start and end of each day.		
3	7.1	If attendance sheets are used, they include workers' signatures or thumbprints to confirm (on at least a weekly basis) the accuracy and completeness of the attendance sheets.		
4	7.1	Workers maintain their own time records; for example, they punch in and out themselves.		
5	7.1	Adequate and accurate time records are maintained for at least one year.		

8. REMUNERATION - Living Wage Estimate

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	8.1	<p>The living wage estimate uses both quantitative and qualitative methods.</p> <p>a. <u>The quantitative method involves the following steps at a minimum:</u></p> <p>i. Assesses workers' expenses.</p> <p>ii. Assesses the average family size in the area.</p> <p>iii. Analyses the typical number of wage earners per family.</p> <p>iv. Analyses government statistics on poverty levels (Poverty level analysis will indicate the cost of living above the</p>		

		poverty line). b. <u>The qualitative method involves the following at a minimum:</u> i. Consultation with workers to understand whether workers' wages are sufficient to cover the basic needs for themselves and their dependents, using the quantitative analysis as a point of reference.		
2	8.1	The living wage estimate arrives at a figure that meets the basic needs of personnel and provides some discretionary income.		

8. REMUNERATION - Living Wage Step-Approach

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	8.1	The existing baseline is established. There is evidence that at least the legal minimum wage – or collective bargaining wage when applicable – is being paid.		
2	8.1	The living wage estimate has been conducted, as described above.		
3	8.1	The living wage estimate and a strategy to advance wages to meet or exceed it are in place. Progress is monitored and documented systematically with indicators and milestones.		

8. REMUNERATION - Wage Payment

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	8.1	At least the legal minimum wage, industry standard wage or collective bargaining wage, whichever is highest, is paid.		
2	8.3	All wages, including overtime compensation, are paid within legally defined time limits. If the law does not define time limits, compensation is paid at least once per month.		
3	8.3	All workers are provided with a separate documented pay statement/stub, other than the payroll, for each pay period. The pay statement/stub shows earned wages, wage calculations, regular and overtime pay, bonuses, all deductions and the final total wage. Payment is accurate and accountable.		
4	8.3	No one receives wages on behalf of a worker, unless the worker has, in full freedom, authorized in writing for another person to do so.		

5	8.3	All legally required benefits are rendered. Waivers are unacceptable.		
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8. REMUNERATION - Payroll Documentation

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	8.3	All workers are included in payroll and social security records.		
2	8.3	Payroll documents, journals and reports are available, complete, accurate, and up-to-date.		
3	8.3	Copies of payroll documentation pertaining to workers employed by a third party organisation, such as a labour agency, security or cleaning firm, or a canteen provider, are made available upon request.		

9. MANAGEMENT SYSTEM - Policies, Procedures And Records

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.1.5	All personnel demonstrated knowledge and understanding of the organisation's policy statement, which includes its commitment to comply with the SA8000 Standard.		
2	9.1.2	SAAS / SAI contact details and the relevant CB contact details are conspicuously displayed on the organisation's policy statement.		
3	9.1.4	<p>Policies state all the requirements of SA8000 and procedures provide instructions on how personnel shall comply with the policies.</p> <p>All personnel demonstrate knowledge and understanding of these policies and procedures. Specifically, the following is expected:</p> <ul style="list-style-type: none"> a. A policy stating all requirements of the Child Labour element, and a policy governing the work eligibility of job applicants. b. A policy stating all requirements of the Forced or Compulsory Labour element. c. A policy stating all requirements of the 		

		<p>Health and Safety element. This policy states how the organisation manages safety and health issues, and outlines the steps the organisation takes to ensure that health and safety hazards are identified and addressed.</p> <p>d. A policy stating all requirements of the Freedom of Association and Right to Collective Bargaining element. This policy states personnel's rights and the country's laws regarding freedom of association and collective bargaining.</p> <p>e. A policy stating all requirements of the Discrimination element.</p> <p>f. A policy stating all requirements of the Disciplinary Practices element. This policy clearly states the organisation's progressive disciplinary measures.</p> <p>g. A policy stating all requirements of the Working Hours element.</p> <p>h. A policy stating all requirements of the Remuneration element.</p> <p>This policy clearly states:</p> <ol style="list-style-type: none"> 1) The system through which personnel can contest wage payments and receive clarifications in this respect in a timely manner; 2) Personnel's wages, including the calculation of wages, incentives systems, benefits and bonuses they are entitled to under applicable laws. 		
4	9.1.6	SA8000 worker representative(s) demonstrate knowledge and understanding of written or oral summaries given to them by management on conformance and implementation of the SA8000 Standard.		
5	9.1.7	Adequate and accurate records from management review demonstrating the organisation's performance relative to the goals and targets set for complying with the SA8000 Standard.		

6	9.1.8	The organisation shall make its policy statement publicly available. At a minimum, the organisation shall post its statement on its website.		
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9. MANAGEMENT SYSTEM - Social Performance Team (SPT)

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.2.1	Documented procedures governing the SPT that clearly define the role of its members, as well as the time commitments for their functions, are available.		
2	9.2.1	SPT members demonstrate knowledge and understanding of their role regarding the organisation's full and sustained compliance with SA8000, with continual improvement.		
3	9.2.1	SPT members demonstrate that they have clear authority from senior management to carry out their responsibilities.		
4	9.2.1	SPT members demonstrate that they are properly trained and have sufficient resources to carry out their roles.		
5	9.2.2	The organisation does not propose or initiate the election of the SA8000 worker representative(s).		
6	9.2.2	The SA8000 worker representative(s) election(s) is (or are) independent and freely conducted by workers for workers; worker participation in this process is voluntary.		

9. MANAGEMENT SYSTEM - Identification and Assessment of Risks

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.3.1	The SPT has documented risk assessment procedures for assessing relevant risks for all elements of SA8000.		

2	9.3.1	The scope of the risk assessment includes internal business operations and processes, as well as suppliers/subcontractors, private employment agencies and sub-suppliers.		
3	9.3.1	SPT members demonstrate knowledge and understanding of the risk assessment procedures.		
4	9.3.1	Documented risk assessments that identify and prioritise the areas of actual or potential non-conformance to the Standard are available.		

9. MANAGEMENT SYSTEM - Monitoring

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.4.1	The SPT maintains adequate and accurate records of its monitoring activities.		
2	9.4.2	Internal audits on all elements of SA8000 are conducted at least annually.		
3	9.4.2	Senior management demonstrates knowledge and understanding of the monitoring reports it receives from the SPT.		
4	9.4.3	The SPT meets at least once every six months to review progress and identify potential actions to strengthen implementation of the Standard.		

9. MANAGEMENT SYSTEM - Internal Involvement and Communication

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.5.1	Personnel demonstrate knowledge and understanding of the requirements of SA8000.		
2	9.5.1	Personnel demonstrate knowledge and understanding of the SPT's role and are able to identify the SA8000 worker representative(s). [Note: this is not applicable to organisations that do not have SA8000 worker representative(s)].		

9. MANAGEMENT SYSTEM - Complaint Management and Resolution

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.6.1	<p>An effectively communicated and documented complaints procedure is readily available to workers in appropriate language(s).</p> <p>The procedure permits workers to settle complaints directly with their immediate supervisor, or if they choose, with someone other than their immediate supervisor.</p> <p>The procedure describes the steps that supervisors and managers take to protect personnel who file complaints.</p>		
2	9.6.1	<p>Personnel demonstrate knowledge and understanding of the organisation's documented complaints procedure.</p> <p>Specifically, personnel understand that the procedure is:</p> <ol style="list-style-type: none"> Available to all personnel Intended to collect comments, recommendations, reports or complaints concerning the workplace and/or non-conformances to the SA8000 Standard Confidential Unbiased; and Non-retaliatory. 		
3	9.6.2	<p>There is a specific person (or multiple persons) who is responsible for investigating, following up on and communicating the outcome of complaints received.</p> <p>This person demonstrates knowledge and understanding of the documented complaints procedure.</p>		
4	9.6.2	<p>Personnel demonstrate that complaints are acted upon by the organisation. Personnel receive communication on the outcome of complaints received.</p>		
5	9.6.2	<p>The steps the organisation takes when receiving complaints from interested external parties are addressed by the complaints procedure or another procedure.</p>		

9. MANAGEMENT SYSTEM - External Verification And Stakeholder Engagement

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.7.2	<p>Relevant stakeholders in the community have been identified and are involved in the SA8000 compliance process in at least one of the following ways:</p> <ul style="list-style-type: none"> a. Consultation during internal or external audits b. Meetings to discuss SA8000 compliance issues c. Co-training of workers and/or managers on SA8000 compliance issues d. Reporting on complaints and resolutions regarding SA8000 compliance issues e. Cooperation in surveying workers on SA8000 compliance issues f. Reviewing organisational progress and program review related to SA8000 compliance through a structured role. 		
2	9.7.2	Adequate and accurate records are maintained of communication with stakeholders and their involvement in the areas listed above.		

9. MANAGEMENT SYSTEM - Corrective and Preventive Actions

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.8.1	<p>A documented procedure for prompt implementation of corrective and preventive actions is available.</p> <p>The procedure names the SPT as the party responsible for monitoring the implementation of these actions.</p>		
2	9.8.1	The SPT demonstrates that the organisation provides adequate resources for the implementation of corrective and preventive actions.		
3	9.8.2	The SPT maintains up-to-date records, including timelines, on progress of corrective and preventive actions.		

		Records include all non-conformances identified through internal or external audits.		
		Records note the person assigned to implementing corrective and preventive actions, the action to be taken and the target date for completion.		

9. MANAGEMENT SYSTEM - Training and Capacity Building

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.9	<p>A training plan and training materials on the implementation of the SA8000 Standard is available and includes all personnel.</p> <p>The training plan and materials are updated at least annually in order to correspond to the results of risk assessments.</p> <p>The effectiveness of training is periodically measured through tests, surveys and/or interviews.</p>		

9. MANAGEMENT SYSTEM - Management of Suppliers and Contractors

Sl. No.	SA8000 Clause Reference	Minimum Criteria	Status of Compliance (OK / Not OK)	Remarks
1	9.10.1	A documented procedure for conducting due diligence on suppliers/subcontractors, private employment agencies and sub-suppliers' compliance with the SA8000 Standard is available.		
2	9.10.1	<p>Adequate and accurate records with the following information are maintained:</p> <ol style="list-style-type: none"> Method of communicating the requirements of SA8000 to senior leadership of suppliers / subcontractors, private employment agencies and sub-suppliers Significant risks of non-conformance by suppliers / subcontractors, private employment agencies and sub-suppliers Efforts made to ensure that significant risks identified are adequately addressed by suppliers / subcontractors, private employment agencies and sub-suppliers 		

		<p>d. Monitoring activities of performance to ensure that suppliers / subcontractors, private employment agencies and sub-suppliers are adequately addressing identified significant risks; and</p> <p>e. List of home workers who provide services to the organisation. The list includes the home workers' location, type of service(s) provided, results of monitoring for SA8000 compliance, and the list and status of corrective and preventive actions in process.</p> <p>If private employment agencies are used, the organisation ensures that:</p> <ol style="list-style-type: none"> 1. It maintains a list of the private employment agencies it works with. This list provides, at a minimum, the private employment agency's address and information about any sub-private employment agencies that they use. 2. The organisation has a contract with any and all private employment agencies used, which includes clearly defined performance indicators. 3. The organisation and the private employment agencies it works with establish and implement a documented policy that specifies, at a minimum, the following: <ol style="list-style-type: none"> a. Private employment agencies operate under a valid business license/permit according to local law (including private employment agencies operating in the worker's home country) b. No employment fees or costs are borne in whole or in part by workers c. Recruitment advertisements include the statement "NO EMPLOYMENT FEES OR COSTS" prominently displayed d. If the organisation discovers that workers have borne fees or costs in whole or in part, the organisation shall completely reimburse the workers e. Terms of employment outlined at the time of recruitment do not differ from what is provided at the organisation (including type of work stated) f. Workers are informed prior to employment (including, if applicable, before they leave their home country/region) of the key employment terms and conditions either verbally or in writing via an employment 		
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		letter/agreement/contract as required by law in their local language; and g. Migrant workers are provided with contracts and treatment equal to those of their co-workers.		
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	Name (s)	Designation	Signature & Date
Evaluated By:			
		Management Representative	
Reviewed By:			

Annexure V: Master List of Social Accountability Internal Auditors

S. No.	Name & Address of Auditor	Internal/ External	Qualification / Experience	Areas that CANNOT be audited

Approved by :
Management Representative

Date:

Annexure VI: Social Accountability Internal Audit Note (IAN)

Audit No : Date: IAN No:

Area audited :

Auditor(s): Auditee(s):

AUDIT OBSERVATIONS:

Sl. No:	SA8000:20 14 Clause Ref.:	SAMS Doc Ref: :	Observations	Severity
Signature of Auditor (s)				

AGREED CORRECTIVE / PREVENTIVE ACTIONS:

Sl. No:	Root Cause (s) of the problem	Agreed corrective / preventive action	Due Date	Responsibility
Signature of Auditee (s)				

FOLLOW-UP AUDIT SCHEDULE

On / within (date) : By:.....

Follow-up audit observations of the auditor with signature:

Corrective and preventive actions were found to be Satisfactory Unsatisfactory

Remarks:

Signature (with date) of Follow-up Auditor

IAN Closing: Closed on / New IAN Number & Date:

Signature of Management Representative:.....Date:

Annexure VII: Social Accountability Internal Audit Summary

Social Accountability Management System Internal Audit Summary												
Audit No:		Audit Date:				Audit done by:						
SA8000:2014 Clause		Number of Observations										
		Top Management	Marketing	Purchase	Stores	Work Execution	Maintenance	Quality Assurance	Calibration	HRD	SMR's Office	Clause Total
IV - 1	Child Labour											
IV - 2	Forced and Compulsory Labour											
IV - 3	Health and Safety											
IV - 4	Freedom of Association and Right to Collective Bargaining											
IV - 5	Discrimination											
IV - 6	Disciplinary Practices											
IV - 7	Working Hours											
IV - 8	Remuneration											
IV - 9 Management Systems												
IV - 9.1	Policies, Procedures and Records											
IV - 9.2	Social Performance Team											
IV - 9.3	Identification and Assessment of Risks											
IV - 9.4	Monitoring											
IV - 9.5	Internal Involvement and Communication											
IV - 9.6	Complaint Management and Resolution											
IV - 9.7	External Verification and Stakeholder Engagement											
IV - 9.8	Corrective and Preventive Actions											
IV - 9.9	Training and Capacity Building											
IV - 9.10	Management of Suppliers and Contractors											
Department Total Observations												
No. of closed Non-conformances (Observations)												
No. of open Non-conformances (Observations)												
Prepared by : Management Representative		Signature:				Date:						

Annexure VIII: Minutes of SPT Review Meeting

Review Period: To

Meeting No: **Venue:** **Meeting Date:** **Next Meeting Due On:****Attended by:**

S. No.	Name	Designation / Job Title
1		
2		
3		
4		

Status Review of Corrective / Preventive Actions (Started / Completed / On-going) During Review Period

S. No.	Corrective / Preventive Action Summary	Due Date	Responsibility	Present Status	Further Action Planned	Resources allocated	Due Date	Responsibility
1								
2								
3								
4								

Review of New Issues / Developments During Review Period

S. No.	Summary of New Issues / Developments	Action Required	Corrective / Preventive Action Planned	Resources allocated	Due Date	Responsibility
1						
2						
3						
4						

Prepared by:**SPT Leader****Date:***Note: Copies of this document are distributed to the concerned person(s) for further action.*

Annexure IX – List of Interested Stakeholders

Gujarat Fluorochemicals Limited - Social Accountability 2019**Annexure - I**

List of Interested Stakeholders includes the following but not limited to:

Major Suppliers			
S.No.	Name Of Supplier	Supplier of/Service Provider	Responsibility
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
Contractors/Sub-contractors: On Site Manpower Suppliers			
S.No.	Name Of Supplier	Product/Service	Responsibility
1			
2			
3			
4			
5			
Government & Local Civic Body - Dahej			

S.No.	Name
1	District Employment office, Bharuch
2	Office of Assistant Commissioner of Labour, Bharuch
3	Office of Government Labor Officer, Bharuch
4	Industrial Training Institute, Bharuch
5	Public Works Department, (R&B Section) Bharuch
6	District Collector Office, Bharuch
7	Prohibition & Excise Department, Bharuch
8	Office of the District Development office, Bharuch
9	Bhartiya Sanchar Nigam Limited (BSNL), Bharuch
10	Office of the Taluka Development Office, Vagra
11	Gram Panchayat, Ambetha, Jageshwar, Luvara & Luckygam
12	Primary Health Center, Ambetha & Dahej
13	Petroleum Chemical Petrochemicals Investment Region (PCPIR), Dahej
14	Marine Police Station Dahej
15	Forest Department, Bharuch
16	Gujarat Pollution Control Board, Bharuch

Government & Local Civic Body - Ranjitnagar	
S.No.	Name
1	District Employment office, Godhra
2	Office of Assistant Commissioner of Labour, Godhra
3	Office of Government Labor Officer, Godhra
4	Industrial Training Institute, Godhra & Halol
5	District Collector Office, Godhra
6	Prohibition & Excise Department, Godhra
7	Office of the District Development Office, Gogamba
8	Bhartiya Sanchar Nigam Limited (BSNL), Halol
9	Office of the Taluka Development Office, Gogamba
10	Gram Panchayat, Ranjitnagar, Jitpura, Kankodakui, Nathkua
11	Primary Health Center, Ranjitnagar
12	Police Station, Rajgarh
13	Forest Department, Gogamba
14	Gujarat Pollution Control Board, Godhra
15	District Agriculture Office, Godhra
16	Veternary Office, Godhra
17	Government Sujalam Sufalam Scheme, Godhra

Non Government Organizations - Dahej	
S.No.	Name
1	Bharuch Traffic Education Trust, Bharuch
2	Citizen Awareness & Welfare Society
3	Indian Red Cross Society
4	Samsta Vankar Samaj Trust
5	Shri P.J. ChhedaJanata Vidhyayalaya, Dahej
6	Jeevandeep Project (Volunteer Organization), Bharuch
7	Primary School, Ambetha
8	Rotery Club, Bharuch/Dahej

Dahej Industrial Association

Non Government Organizations - Ranjitnagar	
S.No.	Name
1	Bhartiya Agro Industrial Foundation, Vadodara
2	Deepak Foundation, Vadodara
3	Safe Panchmahal Foundation Trust, Godhra
4	Panch Industrial Samajik Sanskruti Welfare Society, Godhra

Annexure X – Risk Assessment Form

Risk Assessment Form

Pregnancy Risk Assessment *(Also to be used for mothers who have given birth in last 6 months or for nursing mothers)*

Name.....DeptJob Title.....Date.....

Expected Delivery Date.....

Review Date.....

Does your work activity involve any of the following:	Yes /No	Details	Control Measures
Manual handling			
Vibration			
Noise			
Radiation			
Work with Biological Agents			
Work with Chemicals			
Work in confined areas			

Movements and Posture – prolonged sitting, standing, bending, stretching etc.			
Work Alone			
Shift work or night work			
Work in extremes of temperature			
Extensive Travelling			
Working at heights			
Work without good access to toilet and rest facilities			
Use of Personal Protective equipment			
Work in a particularly violent environment			

3								
4								
5								
Contractors/Sub-contractors: On Site Manpower Suppliers								
S/N	Name Of Supplier	Product/Service	Mode Of Control	Frequency	Completed on	Planned in Year ()	Planned in Year ()	Responsibility
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
Prepared By						Authorized By		

