


**EPL Ltd.**  
**(Formerly known as Essel Propack Limited)**

<b>Doc No:</b> HR/POL/LABOUR /002	<b>Doc. Title: No Child Labour &amp; Remediation Policy</b>			
<b>First Issued Date:</b> 10.10.2020	<b>Revision No.:</b> 01	<b>Revision Date:</b> 10.10.2022	<b>Effective Date:</b> 10.10.2022	<b>Next Review:</b> 10.10.2024
<b>Applicable Location:</b>	Applicable to all units and offices of EPL Limited			
<b>Retention Limit</b>	Permanent with continuous updation			

Authority	Name	Designation	Sign and Date
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<b>Approved By</b>	Mr. Dileep Joshi	Global CHRO	

**Review Details**

Date	Revision Details	Page No
10.10.2020	First Release	--
10.10.2022	Policy was reviewed by the policy formulation authorities. We have reworded the policy to adhere to our standard policy format while keeping the scope, purpose, coverage and implementation details intact as per the initial policy. policy stands revised and effective for next 2 years	All

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## No Child Labour & Remediation Policy

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### Introduction

EPL Ltd is committed to the highest levels of ethics and integrity in the way that EPL Ltd conducts business. EPL Ltd does not employ any individual under the age of 18 years.

The General Principals of EPL Ltd (the Company) 'No Child Labour Policy' is based on the Company's commitment to find practical, meaningful and culturally appropriate responses to support the elimination of such labour practices.

EPL Ltd's Human Rights Policy covers adequate reference of EPL's **No Child Labour Policy and Remediation Plan**

### Purpose:

- EPL Ltd's 'No Child Labour Policy and Remediation Plan' (henceforth referred as Policy) is an important element in strictly following the policy and setting guidelines for its implementation in committed manner across all its businesses
- Set norms for continual implementation of the policy, monitoring and undertake necessary changes from time to time as needed
- Communication access covering all employees and periodic monitoring enables quantitative and qualitative outreach

**Background:** EPL Ltd is an Indian Public limited company having manufacturing locations in India and across globe and accordingly policy follows norms as under:

- **The Child Labour (Prohibition and Regulation) Act, 1986, India**
- Right to Education (RTE) Act, 2009, India
- UN Global Compact – Principle Five: Labour: Businesses should uphold the effective abolition of child labour
- The International Labor Organisation (ILO) conventions 138 and 182
- Sustainable Development Goals (SDGs)

### SCOPE:

This policy applies to all people working with EPL Ltd in various capacities across all units, includes all subsidiaries and business associates.

### Policy

EPL Ltd:

- Does not employ any person below the age of eighteen years (18 years) at the workplace
- Prohibits the use of child labour in all its units
- Adheres strict compliance with all relevant local, international laws and standards with respect to no child labour policy
- Does not engage any child labour on site and ensures the same in its supply chain

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**Approved by:**

**Dileep Joshi**  
**CHRO (Global)**



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- Expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate
- A system of checking and maintaining records of workers at the time of employment, to determine proof of age is in place and monitored on a regular basis
- Mechanisms are in place to create awareness about child rights and the prohibition of child labour, and to communicate the issues/adverse impact /challenges of child labour at all units of EPL Ltd
- Adhere to and respect tenets of the Universal Human Rights as credo for conducting the business

### **Definition and explanation**

- Employing any person below the age of eighteen years (18 years) at the workplace
- Child labor is defined as work undertaken by a child which; the child is legally prohibited from undertaking or is likely to be harmful to the Child's health or physical, mental, spiritual, moral, or social development; or interferes with a Child's education
- All actions concerning the child to take full account of his or her best interests
- The right of the child to be protected from economic exploitation, from performing any work that is likely to be hazardous or interferes with the child's education, or is harmful to a child's health or physical, mental, spiritual, moral or social development

### **Communication, Responsibility, Authority and Accountability and Monitoring Process:**

#### **Communication:**

- Communicated to all employees in a manner in which it can be understood during induction programs, security guards, *through supervisors of contract workers*, manuals and intranet portals
- Adequate communication throughout the EPL facilities through, visible displays, electronic media and trainings
- Employment contracts and other records, documenting all relevant details of the employees, including age and proof that the person is not a child at the time of recruitment or engagement, are maintained at all units by the Human Capital (HC) Department of each establishment and the same are available for verification by any authorized personnel, relevant statutory body and internal and external audit teams
- Translating communications into all relevant languages and display them at worksites, on the company's premises; making it publicly available through virtual platforms like websites
- Maintaining a communications contact list of stakeholders, child welfare organisation, NGO representatives and providing information on the company's website
- Regular monitoring and keeping of records is undertaken by expert internal and third party auditors

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### Responsibility and Accountability:

- The implementation of the policy is the responsibility of the Unit's HR Department and the security staff who do not permit minors to enter the factory as workers
- Regional HR Heads and Location Human Capital Team
- Human Rights Committee (comprising of the Global CHRO, Regional HR Head, Local Unit Head)

### Implementation and Monitoring Process:

- Agenda and discussion during Works Committee Meetings and Focused Group Discussion (FGD) which are conducted monthly and/or quarterly
- A formal report should be forwarded to the Human Rights Committee on a six monthly basis
- All employees, supervisors and staff are extended adequate information and training on the subject. Anyone who has doubt about a potential likelihood of human rights violation incidence in spite of all precautions is expected and should report the same immediately through the Speak Up Portal
- Communication about the policy is covered through different channels of internal communication such as – induction, awareness sessions, emailers, internal magazine etc. to ensure 100% employee awareness
- Internal and external audits like Smeta
- Corporate Human Resources undertakes random checks of records annually and records are maintained
- All employees, supervisors and staff are extended adequate information and training on the subject. *Anyone who has doubt about a potential likelihood of such incidence in spite of all precautions, is expected and should report the same immediately to the location HR team.*
- Provision for accidental incidences the company has a detailed Remediation Plan and responsibility, accountability and authority is with location HR team for immediate mitigation of the situation

### Remediation Plan

#### EPL - CHILD LABOUR REMEDIATION PLAN

The committee (at each plant level) to be headed by senior HR team member and should include / have:

- One representative from shopfloor
- Unit Head
- NGO representative

#### Process:

The Committee will monitor remediation plan adherence at plant level general and non-exhaustive procedure given here under for the development and implementation of a child labour remediation

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plan in case of an accidental / unforeseen event of child labour at any of EPL offices, manufacturing units and/or subsidiaries.

### Steps to consider: should we mention specifically about CACR arrangement:

- Remove child from workplace with immediate effect and arrange for safety of child
- Contact parents / NGO official with EPL
- Identify child / family needs & cause for child labour
- Develop remediation, education and financial plan for child with family / representative
- Offer eligible family member replacement employment
- Option if the child attaining age of 18 years want to be employed / engaged

### Implementation and monitoring of the remediation plan:

- Collaborate with parents / welfare department / NGO to conduct regular home and school visits
- At legal age, child will decide to return to employment at their own discretion
- Develop and distribute monitoring report to stakeholders
- Funding the Remediation Program to ensure that all phases of the remediation program are properly funded

### Developing systems and mechanisms to avoid child labour:

- Inform / communicate with the Human Rights Committee immediately without delay
- Investigate thoroughly the incidence to check what went wrong and how and prepare an action plan to avoid reoccurrence
- Develop and communicate widely EPL policy for prohibition of child labour
- Check and maintain additional vigilance for employment records to determine proof of age

### Responsibility and Accountability of the Committee

- Adequate funding are arranged with immediate effect
- The implementation and monitoring needs to be done by committee members or any external agency nominated by the committee
- If there is any hindrance in the implementation and monitoring of the remediation plan, this should be immediately brought to the attention of the Human Rights Committee
- On the completion of the remediation plan, the committee should ensure that the remediation plan objectives are achieved external agencies can be nominated to perform regular checks to ensure no child labour exists in the supply chain

### Note:

Committee to be formed and committee configuration to be decide by Regional HC Head  
No Child Labour and Remediation plan to be one of the agenda of all quarterly meetings at all locations

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Training heads / Supply chain and / or vendor development department and security personnel should be part of these meetings  
Communication access covering all internal and external stakeholders and periodic monitoring enables quantitative and qualitative outreach

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