

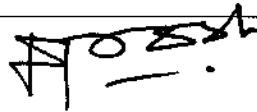


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| Doc No: HR/POL/Child Labour Remediation | Doc. Title: Policy on Child Labour Remediation | | | |
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| Applicable Location: | Applicable to all units and offices of EPL Limited | | | |
| Retention Limit | Permanent with continuous updation | | | |

| Authority | Name | Designation | Sign and Date |
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1. PURPOSE

EPL Limited (EPL) is committed to ensuring the rights and protection of children under the age of 18 years (as set in the UN convention on the rights of child), and also adopts the definition of child labour as contained in Convention No.138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour.

EPL recognises 18 years old as the minimum age for full employment

EPL is committed to no Child Labour Policy (please refer to EPL's Global Policy on this subject available on the intranet) across its global units and in the event where such labour is discovered, EPL must offer remediation opportunities.

2. SCOPE

All EPL Staff across global units are responsible to ensure this Policy is implemented at all times, including adherence by Contractors and Suppliers by following all norms for compliances at all given times.

3. Our Policy and Local Laws

Our Operation sites (including offices), must observe the laws of the country, province, region, state and locality in which they are located. All developments of specific procedures, guidance and training with regards to children and their care, shall be in line with both local laws and this policy.

EPL will ensure recruitment agencies and contractors have valid licenses to adhere local and central laws to minimize the risk of misconduct of and to ensure adherence to international labor standards.

4. REMEDIATION:

EPL has a robust plan and procedures to use "Remedial Procedures" in the event accidental or unforeseen eventualities for extending assistance for protection of the child's interest and welfare.

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Approved by:


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2.1 Phase One:

Immediate action will be taken if there is an instance or an apprehension that a worker is below the legal age of employment. Anyone who is working or visiting our premises notices that a child labour is working on the premises should follow the below actions:

Step 1: Maintain calm and composure without raising alarm which could be detrimental to the child worker / children workers

Step 2: Inform the HC Manager of the Unit and the Unit Head.

Step 3: The HC Manager or team member from HC department should check his/her Identity Card and related documents and follow the below actions immediately:

- a) Remove the child from work immediately
- b) Ensure the child is in a safe place
- c) Obtain contact details (ideally mobile phone number) of child and parents / guardian, and wherever possible, home address.
- d) Clarify the identity and age of the child. Review age documents of the child and verify that they are genuine
- e) Talk to the child to ensure he/she understands what is happening and why
- f) Review all the personnel records at the workplace to identify whether there are any other child workers
- g) Check / investigate source through which the child worker was allowed an entry and report it to the Unit Head and Chief Human Resources Officer within the next 3 to 5 working days.

2.2 Phase Two: Designing a remediation programme

- The worksite shall terminate its employment relationship with the child and provide him/her a child labor remediation program considering the best interest of the child.

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- Before starting this phase of the process, ensure the child's welfare must be the first priority for any remediation programme. The remediation programme must be designed to tackle these specific drivers and to reduce the risk that they push the child back to work again or expose to more critical situations.

Key stages are:

- A thorough investigation into the specific circumstances of each child, including family background, education history and economic circumstances. This should also include discussions with each child about their ambitions and how education can help in achieving them and meetings with parents exploring why the child was not already placed in school. This understanding will enable the team to develop an educational solution, which is more attractive to the child.
- Every Unit has a tie up with a local NGO working for development of children welfare which will counsel the child and the parents/guardian.
- • Evaluation of whether another adult family member could be employed by the factory in the child's place. This maintains the family's income and continues the link between the factory and the family, making it more likely that remediation will be sustainable.
- Collaborate with parents/welfare department / NGO to conduct regular home and school visits

2.3 Phase Three:

- When the child reaches the minimum working age, he/she shall be given the opportunity to be re- employed by the same worksite of EPL.
- While implementing the remediation program, EPL shall ensure that the relevant worksite identifies the gaps in the recruitment or management process at the worksite and implements a corrective action plan within 30 working days.
- EPL (or through a third party organization) shall monitor and keep track of the process of the remediation program until the child labor case is completely closed.
- The next step with regard to the child/education could be undertaken with consultation with the local NGO.

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Remediation Committee:

Every Unit has a Remediation committee comprising of the Unit Head, Unit HC Head and 1 representative from the shop floor.

This committee will:

- have quarterly meetings to review the procedures laid down
- monitor training time tables and logs for new employees, contract labour, new suppliers
- submit the quarterly report to Corporate HC
- The implementation and monitoring of the Remediation Plan needs to be done by the Committee 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 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: Wherever the national law is applicable in this regard, the scheme, which is more beneficial, will be used for the remediation purpose.

EPL will ensure that this policy is publicly available throughout the Company and clearly communicated to all employees, contractors and suppliers in the manner, which can be understood.

5. QUALITATIVE TARGET:

- Communication of this policy to all stakeholders through display of the policy on notice boards, emailers, conducting Awareness Sessions for all Employees, Contractors at timely intervals by Unit HC and maintaining records of the same.
- Conducting Quarterly Meets of Committee
- Distribution of books to needy children in vicinity of respective EPL units on International No Child Labour Day.

QUANTITATIVE TARGET:

EPL aims to ensure there is

- i) Zero case of Child Labour amongst the internal and external stakeholders
- ii) Number of Quarterly Committee Meets in each Unit
- iii) % of employees, contractors covered through Awareness Sessions

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iv) Number of registered Suppliers and Contractors with complete records stating confirmation 'No Child Labour' policy is followed by them.

6. REVIEW

The Global Chief Human Resource Officer will periodically review the effectiveness of the policy, programs and may recommend changes to achieve the desired outcome to support the business strategy.

Miscellaneous: In case of discrepancy and/or inconsistency between the English version and other language version, the English version shall prevail.

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