Steel Strips Wheels Limited

Child Labour Young Worker

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1. Purpose

SSWL is committed to respecting human rights and ensuring no child labour is used in any form across our operations and value chain. This policy establishes clear rules and controls to:

- Prevent and eliminate child labour in SSWL operations, contractors, and supply chain where SSWL has influence;
- Protect young workers (where legally permissible) from hazardous work and exploitation;
- Enable effective due diligence, reporting, remediation, and continuous improvement aligned with EcoVadis Labour & Human Rights expectations.

2. Policy Statement (Zero Tolerance Commitment)

SSWL maintains zero tolerance for:

- Child labour in any form;
- Any of the worst forms of child labour, including forced labour, bonded labour, trafficking, or hazardous work;
- Any retaliation against individuals raising concerns in good faith.

SSWL will:

- Comply with applicable labour laws and strive to meet or exceed internationally recognised standards;
- Implement robust age verification and onboarding controls;
- Require contractors and suppliers to comply with equivalent standards;
- Take immediate remediation and corrective action when risks or cases are identified.

3. Scope & Applicability

This policy applies to:

- All SSWL employees (permanent, temporary, trainees, apprentices, interns where applicable), management, and directors;

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- All contract labour, manpower agencies, service providers, and subcontractors working for or on behalf of SSWL;
- Suppliers and business partners providing goods or services to SSWL, particularly where labour-intensive work is involved.

Where local law differs, SSWL will apply the stricter of applicable legal requirements or this policy and SSWL contractual standards.

4. Definitions

For the purpose of this policy:

- **Child:** Any person below the age defined as a child under applicable law; for SSWL's internal controls and supplier standards, SSWL requires a minimum age of 18 years for employment at SSWL workplaces and for contractor labour deployed at SSWL sites, unless a documented legal exception is approved in writing by CHRO with enhanced safeguards (and only where strictly permitted by law).
- **Child Labour:** Work that deprives children of their childhood, potential, dignity, education, or is harmful to physical/mental development.
- **Young Worker:** A person above the minimum legal working age but below 18 years (where legally permitted).
- **Hazardous Work:** Work that is likely to jeopardize health, safety, or morals of young persons, including (indicative) heavy machinery, welding, high heat, chemical exposure, night shifts, confined spaces, work at heights, or any work prohibited for minors by law.
- **Worst Forms of Child Labour:** Includes slavery-like practices, trafficking, forced/bonded labour, use in illicit activities, and hazardous work.
- **Contractor / Manpower Agency:** Any third party providing labour or services to SSWL sites or operations.
- **Supplier:** Any organisation providing goods/services to SSWL, including tier-1 and where possible tier-2 suppliers for high-risk categories.

5. Legal & International Standards Framework

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This policy is guided by:

- Applicable Indian labour laws on child and adolescent employment and working conditions;
- International Labour Organization (ILO) principles, including minimum age and elimination of worst forms of child labour;
- United Nations Universal Declaration of Human Rights and principles on responsible business conduct;
- EcoVadis Labour & Human Rights theme expectations for Policy, Actions, Monitoring, and Reporting.

6. Roles & Responsibilities

6.1 Board / MD / CEO

- Provide oversight and ensure adequate resources for implementation, monitoring, and remediation.

6.2 P&A Head – (Policy Owner)

- Ensure implementation across locations; approve procedures; ensure periodic review; ensure training and reporting mechanisms.

6.3 Plant Head / Location HR Head

- Enforce site-level controls (ID checks, contractor gate controls, audits, incident response).
- Maintain records and ensure corrective actions are implemented.

6.4 Procurement & Supply Chain

- Embed child labour requirements into supplier onboarding, contracts, POs, and supplier evaluations.
- Conduct risk-based supplier due diligence and follow-up actions.

6.5 EHS / Safety Function

- Define and monitor hazardous work controls; ensure no young worker exposure to hazardous areas/tasks.

6.6 Contractors / Manpower Agencies / Suppliers

- Comply with this policy and contractual clauses; maintain verifiable age records; cooperate with audits.

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6.7 All Employees

- Report suspected or actual violations promptly; cooperate in investigations; uphold policy requirements.

7. Mandatory Requirements & Operating Controls

7.1 Age Verification – SSWL Direct Employment

- Collection and verification of government-issued proof of age before onboarding;
- Cross-checking documents during joining and maintaining verified copies securely;
- Prohibition of any informal hiring without HR approval and documentation;
- For trainees/apprentices (if applicable): written approval, verified age, and documented safeguards.

7.2 Contractor & Visitor Access Controls (At SSWL Sites)

- Mandatory gate verification of contractor workforce lists and IDs;
- Deployment only after HR/contract owner approval;
- Surprise checks in high-risk areas (packaging, housekeeping, canteen, logistics, maintenance).

7.3 Protection of Young Workers (If Legally Permitted in Any Scenario)

- Written risk assessment and task restrictions (no hazardous work);
- No night shifts / overtime beyond legal limits;
- Mandatory supervision, safety induction, PPE, and periodic health checks where required;
- Continued access to education/training as applicable.

7.4 Prohibition of Fees, Coercion, or Document Retention

SSWL prohibits:

- Any recruitment fees charged to workers by agencies;
- Retention of original identity documents;
- Any form of forced/bonded labour linked to child labour risk.

7.5 Communication

- Communicated to employees and contractors through induction and periodic refreshers;

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- Displayed or made available in accessible form at locations, as appropriate;
- Shared with suppliers and incorporated into supplier expectations.

8. Supply Chain & Contractor Standards

SSWL recognises that child labour risks may occur deeper in supply chains. Therefore, SSWL will implement risk-based due diligence.

8.1 Contractual Clauses & Supplier Commitments

All relevant supplier and contractor contracts/POs must include clauses covering:

- Prohibition of child labour and worst forms of child labour;
- Right to audit / right to request evidence;
- Obligation to cascade requirements to subcontractors;
- Corrective action timelines and consequences for non-compliance.

8.2 Risk-Based Due Diligence

SSWL will prioritise due diligence based on risk factors such as:

- Labour-intensive services (housekeeping, security, canteen, logistics);
- Geographies with higher child labour prevalence;
- Low visibility subcontracting;
- Price pressure or informal employment indicators.

8.3 Supplier Assessment & Monitoring

Depending on risk, SSWL may use:

- Supplier self-assessment questionnaires (SAQs);
- Document verification (age records, wage records, attendance);
- On-site assessments / audits (announced or unannounced);
- Corrective Action Plans (CAPs) and follow-up verification.

8.4 Supplier Capability Building

- SSWL may support awareness sessions, guidance notes, and improvement plans for suppliers, especially MSMEs, to strengthen compliance.

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9. Reporting, Grievance & Non-Retaliation

SSWL provides safe channels for reporting concerns related to child labour or labour rights, including reporting to line manager, HR, plant leadership, and through SSWL's grievance/whistleblowing mechanism (as applicable).

Non-retaliation: Any retaliation against a reporter acting in good faith is prohibited and will be treated as a serious violation.

10. Remediation & Corrective Action (If Child Labour is Identified)

SSWL's approach prioritises the best interest and wellbeing of the child.

If child labour is identified within SSWL operations or at SSWL sites (including contractors), SSWL will:

- Immediately remove the child from the workplace and ensure the child is safe and not exposed to harm;
- Not send the child away without protection measures; engage HR leadership and competent authorities/guardians responsibly;
- Implement a remediation plan that may include supporting access to education and basic needs, in line with legal requirements and credible partners;
- Conduct root cause analysis to determine how controls failed (agency misconduct, document fraud, gate failure, subcontracting);
- Implement corrective actions with responsible owners and timelines;
- Apply consequences for responsible parties, including termination of contractor/supplier relationship where warranted.

Where child labour is identified in the supply chain, SSWL will require a documented CAP, verify remediation, and may suspend or exit the supplier if remediation is not credible or timely.

11. Monitoring, Audits, Training & Awareness

SSWL will maintain an effective management system through:

- Periodic internal audits and compliance checks;
- Risk-based supplier/contractor audits;

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- Annual review of due diligence outcomes and CAP closure;
- Training for HR, security, procurement, contractor supervisors, and relevant operational teams;
- Awareness communication for workers and contractors in relevant local languages where required.

12. Record Retention & Data Privacy

SSWL will maintain appropriate records to demonstrate compliance and support EcoVadis evidence needs, such as:

- Age verification records (securely stored);
- Contractor workforce registers and verification logs;
- Audit reports, SAQs, CAPs, and closure evidence;
- Training attendance and materials;
- Incident logs and remediation documentation.

All personal data will be handled responsibly and only accessed by authorised personnel.

13. Non-Compliance & Disciplinary Action

Violations of this policy may result in:

- Disciplinary action up to and including termination of employment;
- Removal/blacklisting of contractors or manpower agencies;
- Contract termination, suspension of orders, and legal action as applicable;
- Reporting to statutory authorities where required.

14. Governance, Review & Disclosure

- The CHRO and Plant/Location HR Heads are responsible for implementation and monitoring.
- This policy will be reviewed at least every two years (or earlier in case of legal changes, incidents, or audit findings).
- The latest version of this policy will be publicly available on SSWL's website and communicated internally.

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16. Annexures

Annexure A: Child Labour Red Flags

Workers who appear underage or lack valid age documents

- Duplicate IDs, mismatched photos, inconsistent personal details
- Subcontractors bringing labour without prior approval
- Workers afraid to speak, coached responses, restricted movement
- Wage payments routed through intermediaries without transparency
- High turnover of low-skilled labour with no records

Annexure B: Acceptable Age Verification Documents (Indicative)

- Government-issued proof of age/identity (as per applicable law)
- Secondary verification where needed (two-document verification for contractors)

Annexure C: Minimum Supplier/Contractor Evidence

- Workforce register with verified date of birth
- Attendance and wage records
- Training proof
- Subcontractor list (if any)
- Corrective Action Plan (CAP) and closure evidence (if applicable)

Prepared By:	Approved By:
Lead PM & Strategy	General Manager – P&A

STEEL STRIPS WHEELS LTD. ★ Chandigarh ★

** End of Document**

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