Steel Strips Wheels Limited

Ethical Recruitment No Recruitment Fees Policy

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1. Purpose

This Policy establishes SSWL's standards for ethical recruitment and fair hiring practices across all operations and sites. It is designed to prevent forced, bonded or involuntary labour risks, ensure transparent and lawful recruitment, and protect workers' rights in line with applicable labour laws and internationally recognised human rights principles. This Policy is a public compliance document and is also intended to serve as evidence for EcoVadis assessment.

2. Scope and Applicability

This Policy applies to recruitment and hiring of all categories of workers engaged by SSWL or working at SSWL premises, including:

- Permanent employees and fixed-term employees
- Apprentices, trainees and interns (where applicable)
- Contract workers supplied by contractors/service providers
- Migrant workers (domestic or international, if applicable)
- Any recruitment agency, labour broker or intermediary engaged by or on behalf of SSWL

Where SSWL uses contractors or third parties to supply labour, this Policy forms part of contractual requirements and SSWL's contractor/supplier evaluation and monitoring processes.

3. Definitions

3.1 Ethical Recruitment

Recruitment that is lawful, voluntary, transparent and fair, where the worker understands the terms and conditions of employment, is not deceived, is not coerced, and is not required to pay recruitment fees or deposits to secure a job.

3.2 Recruitment Fees and Related Costs

Any fees or costs incurred in the recruitment and employment process, including but not limited to service fees, placement fees, processing/documentation fees, medical tests, identity documents, training fees, travel/transport, accommodation during recruitment, work permits/visas (if applicable), or any other charges linked to securing employment. SSWL follows the principle that such costs must not be charged to workers.

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3.3 Employer Pays Principle

The principle that workers do not pay for a job. SSWL and/or the contractor (as applicable) bears recruitment-related costs and ensures no recruitment fees are charged to workers, directly or indirectly.

3.4 Recruitment Agent/Labour Broker

Any third party that recruits, refers, supplies or places workers, including recruitment agencies, placement firms, contractors, sub-contractors, brokers, and informal intermediaries.

4. Policy Commitments

SSWL commits to:

- Conduct recruitment ethically, transparently and in compliance with applicable laws and SSWL values.
- Ensure workers do not pay any recruitment fees or related costs to obtain employment with SSWL or to work at SSWL premises ("workers don't pay").
- Prohibit forced labour indicators, including retention of original identity documents, deposits, debt bondage, threats, intimidation or restriction of movement.
- Provide written employment terms (appointment letter/contract) that are understandable to the worker, including wages, statutory benefits, working hours, overtime, leave, deductions and grievance channels.
- Ensure non-discrimination and equal opportunity in recruitment and employment decisions based on role requirements and merit.
- Establish accessible grievance channels for applicants and workers (including contract and migrant workers) and prohibit retaliation for raising concerns in good faith.
- Extend these expectations to contractors, recruitment agents and suppliers through contracts, due diligence, monitoring and corrective actions.

5. Responsible Recruitment Standards

5.1 Transparent Hiring Process

All recruitment communications must be truthful and must not misrepresent job role, wages, deductions, benefits, working hours, location, housing/transport arrangements (if any), or employment duration. Job advertisements and offers must clearly state key terms, eligibility, and required documents.

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5.2 Written Contracts and Worker Understanding

Before a worker starts work, SSWL (or the contractor, as applicable) will ensure the worker receives a written contract/appointment letter. Where required, information will be provided in a language the worker understands. Workers must be given time to review terms, ask questions, and retain a copy. Any changes to terms must be communicated in writing and accepted by the worker.

5.3 Age Verification and Prohibition of Child Labour

SSWL will verify minimum working age at the time of hiring using reliable documents and processes. Under no circumstances will SSWL employ child labour. Where young workers (above minimum legal age but below 18) are engaged (e.g., apprentices/trainees), additional protections will apply including restrictions on hazardous work and night work, and enhanced supervision.

5.4 Respectful Recruitment and Data Privacy

Recruitment and onboarding will be conducted in a respectful manner. Personal data collected during recruitment will be limited to what is necessary, handled securely, and processed in line with SSWL's Data Privacy Policy and applicable data protection laws.

6. Recruitment Fees and Expenses (Employer Pays)

6.1 Zero Fees to Workers – Mandatory Requirement

SSWL explicitly prohibits charging any recruitment fees or related costs to workers. This applies to direct hiring, hiring through contractors, and hiring through recruitment agencies/brokers. No worker shall be asked to pay money or provide deposits (cash or in-kind) as a condition of employment.

6.2 Prohibited Fees and Costs

The following are prohibited to be charged to workers (illustrative, not exhaustive):

- Placement, service, registration or referral fees
- Fees for application forms, interviews, skills tests or background checks
- Medical tests/examinations required for employment (where legally permissible for employer to pay)
- Identity documents and copies required for employment, including police verification charges (as applicable)
- Training fees required prior to joining (other than voluntary, optional training not linked to selection)

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- Travel/transport to join employment, if mandated by the employer/agent; and any visa/work permit costs (if applicable)
- Accommodation/food costs during recruitment/placement that are imposed by agents
- Any 'deposit' or 'bond' to secure employment or to avoid penalties for resignation

6.3 If Any Worker Paid Fees – Immediate Refund and Remediation

If SSWL becomes aware that a worker has paid any recruitment fee or related cost to obtain employment, SSWL will investigate promptly and ensure reimbursement/repayment to the worker without retaliation. Root-cause analysis will be conducted and corrective actions taken, including action against responsible agents/contractors and strengthening controls.

7. Recruitment Agents (Due Diligence & Controls)

7.1 Approval and Contracting of Agents

Recruitment agencies and labour brokers may be used only with prior approval by HR and Procurement/Compliance (as applicable). All approved agents must be licensed/registered where required, sign a written agreement, and commit to this Policy, including the no-fees requirement.

7.2 Agent Due Diligence

SSWL will conduct risk-based due diligence before onboarding agents, including review of licensing, ownership, litigation history, labour practices, sub-agent use, fee structures, grievance mechanisms and prior audit findings. Higher-risk recruitment (e.g., large-volume hiring, migrant recruitment) will require enhanced due diligence and more frequent monitoring.

7.3 Ongoing Monitoring and Audits

SSWL may conduct announced or unannounced audits of agents and labour supply chains, including worker interviews, document reviews and fee verifications. Agents must maintain accurate records and cooperate fully. Use of unauthorized sub-agents is prohibited unless explicitly approved and assessed.

8. Identity Documents, Deposits and Freedom of Movement

8.1 No Retention of Original Documents

SSWL prohibits retention of workers' original identity documents (e.g., Aadhaar, passport, PAN, driving licence) as a condition of employment. Where document verification is required, copies may be taken

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with the worker's knowledge and handled securely. If any original document must be held temporarily for a lawful administrative purpose, it shall be with documented voluntary consent, for the shortest time necessary, and the worker must have unrestricted access to retrieve it.

8.2 No Deposits or Financial Bonds

SSWL prohibits deposits, security money, wage withholding or financial bonds that restrict a worker's ability to leave employment in accordance with law.

8.3 Freedom of Movement and Communication

Workers shall have freedom of movement during non-working hours, subject only to reasonable site safety/security rules. Any accommodation provided by SSWL/contractor must not restrict movement or communication.

9. Onboarding, Communication and Worker Awareness

9.1 Induction

All workers will receive induction covering workplace rules, wages and benefits, working hours and overtime rules, health and safety, grievance mechanisms, non-retaliation, and key rights and responsibilities. Induction will be adapted for contract/migrant workers where required (e.g., language support).

9.2 Worker Communication

SSWL will display or make available worker rights information and grievance contacts at sites, and through contractor management processes. Workers shall be encouraged to raise concerns without fear.

10. Monitoring, Recordkeeping and Audits

SSWL will maintain records to demonstrate compliance with this Policy, including recruitment source records, contracts, proof of age verification, agent agreements, audit reports and remediation actions. Where feasible, SSWL will track indicators such as:

- Percentage of hiring through approved agents/contractors
- Number of worker interviews conducted on recruitment fees and ethical recruitment indicators
- Number of grievances/complaints related to recruitment and outcomes
- Number of agent/contractor audits and corrective actions closed

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11. Grievance Reporting and Non-Retaliation

Applicants and workers may report concerns about unethical recruitment, fees, harassment, deception or coercion through SSWL's Grievance Mechanism and/or whistleblowing channels. Reports may be made confidentially or anonymously where permitted. Retaliation against any person who raises concerns in good faith is strictly prohibited. SSWL will investigate reports promptly and communicate outcomes where appropriate.

12. Remediation and Corrective Actions

Where violations are identified, SSWL will take appropriate actions, which may include:

- Immediate reimbursement of recruitment fees/costs paid by workers and removal of any coercive conditions
- Medical, legal or counselling support where needed
- Corrective action plans for contractors/agents, with defined timelines and verification
- Termination of contracts with agents/contractors for serious or repeated violations
- Reporting to authorities where required by law

13. Roles and Responsibilities

- Managing Director/CEO: Approves the Policy and ensures organisational commitment and resources.
- Head – HR: Owns implementation, recruitment controls, training and internal monitoring.
- Procurement: Ensures contractual clauses, due diligence and monitoring of recruitment agencies and labour suppliers.
- Compliance Officer: Supports risk assessment, audits, investigations and remediation oversight.
- Plant/Department Heads: Ensure site-level deployment, induction and contractor oversight.
- Contractors/Recruitment Agents: Comply with this Policy and maintain evidence; ensure no fees and ethical practices.

14. Training and Communication

SSWL will provide periodic training to HR, hiring managers, contractors and relevant staff on ethical recruitment risks and controls, including the no-fees requirement and non-retaliation. This Policy will be communicated to workers and relevant external parties and will be available on SSWL's website.

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15. Review and Updates

This Policy will be reviewed in two years, or earlier if required due to legal changes, audit findings, significant recruitment changes or stakeholder feedback.

Annexure A – Worker Declaration: No Recruitment Fees Template

To be completed during onboarding (including contract and migrant workers, where applicable).

Worker Name	
Employee ID / Contractor ID	
Department / Function	
Employment Type	Employee / Apprentice / Contract Worker / Other
Recruitment Source	Direct / Contractor / Agency / Referral / Other
Declaration	I confirm that I did not pay any recruitment fee or related cost (cash or kind) to obtain this job or to work at SSWL premises. I understand that SSWL prohibits such fees and I can report any concerns without fear of retaliation.
Worker Signature & Date	
HR/Contractor Representative Signature & Date	

Annexure B – Recruitment Agent Due Diligence Checklist Template

To be completed by HR/Procurement/Compliance before onboarding and during periodic reviews.

Due Diligence Item	Requirement/Expectation	Evidence/Records	Status/Remarks
License/Registration	Valid license/registration where required; legal right to operate.	Copy of license; validity check.	
Ownership & Governance	Disclosure of owners; no conflicts; basic integrity screening.	KYC; declarations; screening results.	

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No Recruitment Fees	Written commitment that workers do not pay; fee schedule reviewed; sub-agents controlled.	Contract clauses; worker declarations; fee policy.	
Sub-agent Control	No unauthorized sub-agents; prior approval and due diligence for any sub-agent.	List of sub-agents; agreements.	
Contract Transparency	Offers/contracts are clear, in language understood; no deception.	Sample contracts; worker communications.	
Document Retention	No retention of originals; no deposits/bonds.	Policy; worker interview evidence.	
Grievance Mechanism	Accessible channel for workers; non-retaliation; escalation to SSWL.	Procedure; contact details; records.	
Audit Cooperation	Agent agrees to audits and worker interviews.	Audit clause; past audit reports.	
Training	Agent staff trained on ethical recruitment and SSWL requirements.	Training records; attendance.	

Annexure C – Compliance Reference Summary

This annexure provides indicative reference points that informed this Policy. It is not a legal opinion. SSWL will comply with all applicable laws and updates.

- ILO core labour standards and ILO General Principles and Operational Guidelines for Fair Recruitment (Employer Pays Principle).
- UN Guiding Principles on Business and Human Rights (UNGPs) – due diligence, remedy and non-retaliation.
- OECD Guidelines for Multinational Enterprises – responsible business conduct expectations.

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- Applicable Indian labour laws/codes (illustrative): prohibition of child labour; minimum wages; payment of wages; contract labour requirements; working hours and overtime; social security requirements (PF/ESI) as applicable.
- EcoVadis Labour & Human Rights theme expectations: policies, training, monitoring, grievance mechanisms, and evidence of implementation.

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

STEEL STRIPS WHEELS LTD. Chandigarh

** End of Document**

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