Steel Strips Wheels Limited

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

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Classification: Internal

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1. Purpose

SSWL is committed to respecting workers' rights to freedom of association and collective bargaining, and to enabling constructive employee–management dialogue. This policy establishes principles, responsibilities, and operating controls to:

- Uphold lawful rights of workers to form or join organisations of their choice;
- Enable collective bargaining and representation without intimidation or retaliation; and
- Provide fair, transparent engagement mechanisms aligned with EcoVadis Labour & Human Rights expectations (Policy, Actions, Monitoring, and Reporting).

2. Policy Statement (Commitment)

SSWL respects and supports:

- The right of all workers to freely associate, join or not join worker organisations or unions, and elect representatives;
- The right to collective bargaining and peaceful dialogue consistent with applicable law; and
- A workplace free from interference, coercion, discrimination, or retaliation related to lawful union or worker-representation activities.

SSWL will:

- Maintain open channels for engagement and consultation;
- Ensure equal treatment and non-discrimination for worker representatives and members; and
- Extend expectations to contractors and suppliers through contractual clauses and due diligence.

3. Scope & Applicability

This policy applies to:

- All SSWL employees (permanent, temporary, trainees, apprentices, interns where applicable);
- All contract labour deployed at SSWL sites (through contractors/manpower agencies); and
- Relevant suppliers and business partners, particularly for labour-intensive categories.

Where local law differs, SSWL will apply the stricter legal requirements; or (b) this policy and SSWL contractual standards.

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4. Definitions

- Freedom of Association (FoA): The right of workers to form, join, or not join organisations of their choosing and to engage in lawful activities of such organisations.
- Collective Bargaining: Negotiation between employers and workers' organisations/representatives to determine working conditions and terms of employment.
- Worker Representative: Any elected or appointed representative of workers (including union officials, committee members, worker council representatives).
- Non-Interference: Employer shall not control, obstruct, or manipulate formation/administration of worker organisations or elections.
- Retaliation: Any adverse action (dismissal, demotion, transfer, threats, harassment, reduced hours, discrimination) taken due to lawful union/representation activity or raising concerns.

5. Legal & Standards Framework

This policy is guided by:

- Applicable labour and industrial relations laws in India and jurisdictions where SSWL operates;
- Internationally recognised principles relating to FoA and collective bargaining (e.g., ILO principles);
- UN Guiding Principles on Business and Human Rights (UNGPs) as relevant to labour rights; and
- EcoVadis Labour & Human Rights theme requirements for clear policy commitments, implementation actions, and monitoring.

6. Guiding Principles

SSWL commits to the following principles:

6.1 Voluntary Choice

Workers have the choice to join or not join a union/association, without fear of penalty, discrimination, or disadvantage.

6.2 Non-Discrimination

SSWL prohibits discrimination based on union membership, non-membership, participation in lawful activities, or status as a worker representative.

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6.3 Non-Interference

SSWL will not interfere with lawful formation, governance, elections, or activities of worker organisations, and will not sponsor or control worker organisations.

6.4 Peaceful Dialogue & Good-Faith Engagement

SSWL promotes respectful engagement, consultation, and good-faith bargaining consistent with law.

6.5 Access & Participation

SSWL will enable practical mechanisms for worker representatives to communicate with workers, subject to reasonable site safety and security rules applied fairly and consistently.

6.6 Protection of Worker Representatives

Worker representatives will not be intimidated, threatened, harassed, or penalised for lawful activities.

6.7 Coverage of Contract Workers

SSWL requires contractors and manpower agencies to respect FoA and collective bargaining rights for their workers deployed at SSWL sites.

7. Roles & Responsibilities

7.1 Board / MD / CEO

- Provide oversight and ensure resources for implementation and grievance handling.

7.2 CHRO / Head – HR (Policy Owner)

- Own policy implementation, training, monitoring, and reporting; ensure periodic review; ensure grievance/whistleblowing accessibility.

7.3 IR (Industrial Relations) / Location HR

- Manage engagement processes, committee structures, meeting schedules, documentation, and issue resolution; ensure compliance with non-retaliation and non-interference.

7.4 Plant Head / Department Heads / Line Managers

- Maintain respectful workplace relations; support legitimate engagement processes; ensure no adverse actions against representatives for lawful activities.

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7.5 Procurement & Supply Chain

- Integrate FoA clauses into contracts/POs and supplier onboarding; conduct risk-based due diligence and follow-ups.

7.6 Contractors / Manpower Agencies / Suppliers

- Maintain policies/practices consistent with this policy; cooperate in audits and corrective actions.

7.7 All Workers

- Participate respectfully in dialogue; report concerns and violations promptly.

8. Mandatory Requirements & Operating Controls

8.1 Non-Retaliation Guarantee

SSWL strictly prohibits retaliation against any worker for:

- Forming, joining, or not joining a union/worker organisation;
- Serving as a representative;
- Participating in lawful collective activities; or
- Raising concerns via grievance/whistleblowing channels.

8.2 Engagement & Consultation Mechanisms

Depending on site context and legal requirements, SSWL may enable one or more of the following:

- Recognised union engagement meetings;
- Joint consultative committees / worker welfare committees;
- Safety committees, canteen committees, or other statutory committees; and
- Employee forums or worker councils (especially where union presence is limited).

These mechanisms will be documented with meeting calendars, agendas, attendance, minutes, action trackers, and closure evidence.

8.3 Good-Faith Bargaining (Where Applicable)

Where collective bargaining is applicable and lawful, SSWL will:

- Engage in negotiations in good faith through authorised representatives;
- Maintain transparent processes for proposals, discussions, and agreements; and

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- Ensure agreements are communicated to affected workers.

8.4 Non-Interference Controls

Managers and supervisors must not:

- Threaten workers regarding union choices;
- Offer improper inducements to discourage union membership;
- Influence elections or representative selection; or
- Use surveillance or intimidation against lawful union activities.

8.5 Access for Worker Representatives (Reasonable & Safe)

SSWL will provide reasonable access for lawful representative activities, which may include:

- Notice-board access / communication channels;
- Meeting spaces (as feasible);
- Scheduled engagement time, subject to production needs and legal requirements; and
- Access processes that are non-discriminatory and consistent with safety/security norms.

8.6 Grievance Handling & Dispute Resolution

SSWL will address FoA-related concerns promptly through:

- Line management / HR route;
- Formal grievance mechanism;
- Whistleblowing channel (where applicable); and
- Escalation matrix for unresolved disputes.

9. Alternative Means of Representation (If Unionisation is Restricted)

If, in any jurisdiction or business context, union-related activities are restricted by law, SSWL will respect the legal framework and enable lawful alternative worker representation and dialogue mechanisms (e.g., elected worker committees) to support worker voice and workplace improvements, without retaliation or discrimination.10. Contractor & Supply Chain Requirements

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10.1 Contractual Clauses

SSWL will include FoA/collective bargaining clauses in relevant contractor agreements, manpower supply contracts, service contracts, and supplier terms and conditions/POs (risk-based). Clauses should cover:

- Respect for FoA and collective bargaining;
- Non-retaliation and non-discrimination;
- Right to audit / evidence requests;
- Corrective action requirements; and
- Consequences for non-compliance.

10.2 Due Diligence & Monitoring

SSWL will conduct risk-based assessments focusing on labour-intensive spend categories and high-risk geographies, using:

- Supplier/contractor self-assessments (SAQs);
- Evidence checks (policies, grievance logs, training records);
- On-site assessments or audits where needed; and
- Corrective Action Plans (CAPs) with timelines and verification.

11. Reporting Channels & Whistleblowing (Non-Retaliation)

Workers, contractors' workers, and suppliers can report concerns through HR/IR/Plant leadership and/or confidential whistleblowing/grievance mechanisms (as applicable). SSWL prohibits retaliation against reporters acting in good faith. Any retaliation will be investigated and disciplined.

12. Remediation & Corrective Action

If a violation is identified (e.g., intimidation, dismissal, discrimination, interference), SSWL will take the following actions:

- Immediate protection for affected worker(s) and prevention of further harm;
- Investigation led by HR/IR with Legal/Compliance involvement as needed;
- Corrective actions (including consideration of reversal of adverse actions), manager coaching/discipline, and process fixes;

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- Root-cause analysis and strengthened controls; and
- Supplier/contractor CAP and potential termination/suspension if unresolved.

13. Training & Awareness

SSWL will provide training and awareness for managers/supervisors (non-interference, respectful engagement, retaliation risks), HR/IR teams (good-faith engagement, documentation), security and contractor coordinators (fair site controls), and contractors/manpower agencies deployed at SSWL sites. Communication will be provided in relevant local languages where appropriate.

14. Monitoring, Audits & Reporting

SSWL will monitor the effectiveness of this policy through:

- Periodic internal audits and site compliance checks;
- Tracking of grievances/complaints related to FoA (number, resolution time, closure quality);
- Documented engagement outcomes (meeting minutes, action closure); and
- Risk-based contractor/supplier assessments and CAP closure rates.

Management review will consider trends, key issues, and improvement actions.

15. Records & Data Privacy

SSWL will maintain records such as committee/union engagement calendars, minutes, action trackers, training records, grievance logs, investigation summaries, and supplier/contractor SAQs, audits, CAPs, and closure evidence. All personal data will be handled responsibly and accessed only by authorised personnel.

16. Non-Compliance & Disciplinary Action

Violations of this policy may result in disciplinary action up to and including termination, contractor removal/blacklisting, contract termination or suspension of orders, and legal action/reporting to authorities where required.

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17. Governance, Review & Public Disclosure

This policy is owned by CHRO and implemented by HR/IR with leadership support. It will be reviewed at least every two years or earlier due to legal change, audit findings, or incidents. The current version will be made publicly available on SSWL's website and shared internally and with relevant contractors/suppliers.

18. Related Documents

- Human Rights Policy / Code of Conduct
- Whistleblower / Grievance Redressal Policy
- Contractor Management Procedure
- Supplier Code of Conduct / Responsible Sourcing Policy
- Disciplinary Policy and Investigation Procedure
- EHS Policy (for committee linkages)

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

** End of Document**

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