Steel Strips Wheels Limited

MIGRANT AND CONTRACT WORKER WELFARE POLICY

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1. Purpose

SSWL is committed to providing a safe, respectful and fair workplace for all workers, including contract and migrant workers. This Policy sets minimum welfare standards and controls for the engagement and management of contract and migrant workforce at SSWL sites. It supports compliance with applicable labour laws and aligns with EcoVadis expectations for Labour & Human Rights management practices.

2. Scope and Applicability

This Policy applies to:

- Contract workers engaged through labour contractors or service providers (including housekeeping, security, canteen, logistics and other services)
- Temporary/fixed-term workers, apprentices/trainees and interns where applicable
- Migrant workers (workers recruited from outside the local district/state or from other countries, if applicable)
- All contractors/service providers and any subcontractors supplying labour to SSWL

Contractors must comply with this Policy as a condition of doing business with SSWL. Where legal requirements are more stringent than this Policy, the legal requirements prevail. Where this Policy is more stringent, contractors are expected to follow this Policy.

3. Definitions

3.1 Contract Worker

A worker engaged through a contractor/service provider and deployed to work at SSWL premises.

3.2 Migrant Worker

A worker who moves from their usual place of residence to take up employment (including inter-state migrants and international migrants, if any).

3.3 Welfare Facilities

Facilities and services that support worker wellbeing, including sanitation, drinking water, rest areas, canteen access, medical support, and accommodation/transport where provided.

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4. Policy Commitments

SSWL commits to the following minimum standards for contract and migrant workers:

- No forced labour: no retention of identity documents, no deposits/bonds, and no coercion or threats.
- Fair wages and timely payment: compliance with minimum wages and statutory requirements; clear payslips and lawful deductions only.
- Safe and healthy working conditions: risk-based safety controls, PPE, training and emergency preparedness.
- Respect, dignity and non-discrimination: equal opportunity and respectful workplace; zero tolerance for harassment and abuse.
- Access to grievance mechanisms: confidential/anonymous reporting options; timely resolution; non-retaliation.
- Freedom of association and collective bargaining in accordance with applicable law.
- Adequate welfare facilities: drinking water, sanitation, rest areas, and other legally required facilities; and decent accommodation/transport if provided.
- Contractor accountability: clear contractual requirements, monitoring, audits and corrective actions.

5. Contractor Governance and Due Diligence

5.1 Contractor Selection and Contract Clauses

SSWL will onboard labour contractors and service providers through risk-based due diligence. Contracts must include clauses on compliance with labour laws, wage payment, working hours, social security (PF/ESI), prohibition of child/forced labour, ethical recruitment/no fees, grievance access, non-retaliation, and right to audit.

5.2 Legal Compliance and Registration

Contractors must maintain valid registrations, licences and statutory records required under applicable laws and provide evidence to SSWL on request. SSWL will verify contractor compliance (e.g., wage registers, attendance, PF/ESI deposits, and other statutory filings) through periodic checks.

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5.3 Contractor Induction and Supervision

Contractor supervisors and deployed workers must undergo site induction prior to work commencement. Contractors must ensure adequate supervision to maintain safety and welfare standards and to prevent misconduct.

6. Employment Terms, Wages and Statutory Benefits

6.1 Written Terms and Worker Understanding

Contract and migrant workers must receive clear written employment terms from the contractor (or SSWL where directly employed), including wages, working hours, overtime, leave, deductions, statutory benefits and grievance contact details. Information should be provided in a language the worker understands where practicable.

6.2 Minimum Wages and Timely Payments

Wages must meet or exceed applicable minimum wage requirements and be paid on time in accordance with law. Payment must be traceable (e.g., bank transfer) where feasible. Workers must receive a payslip/wage statement showing earnings and deductions. Unauthorised deductions are prohibited.

6.3 Statutory Benefits and Social Security

Contractors must ensure statutory benefits and contributions are provided as applicable (e.g., PF/ESI and other benefits). SSWL expects contractors to maintain proof of contributions and provide coverage for eligible workers. Workers shall not be deprived of benefits due to documentation delays; contractors must support onboarding and KYC.

7. Working Hours, Overtime, Rest and Leave

Working hours and overtime for contract and migrant workers must comply with applicable law and SSWL's Working Hours, Overtime & Rest Policy. Overtime must be controlled, pre-approved, compensated at legally compliant rates, and should not be excessive. Workers must receive weekly rest days, breaks, and leave entitlements as applicable. Fatigue risks will be managed through safe scheduling and supervision.

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8. Health, Safety and Wellbeing

8.1 Safety Induction and Training

All contract and migrant workers must receive site safety induction and role-specific training, including hazard awareness, PPE use, emergency procedures, and reporting of incidents and near-misses. Training shall consider literacy and language needs.

8.2 PPE and Safe Work Practices

SSWL and contractors will ensure appropriate PPE is provided and used, and that safe work practices are followed. Contractors are responsible for compliance of their workforce with safety rules and supervision.

8.3 Medical Support and Occupational Health

SSWL will ensure access to first aid and emergency response at sites. Contractors must support medical fitness checks as required by law for specific roles and facilitate access to medical care. Welfare and mental wellbeing concerns may be reported through grievance channels.

9. Accommodation, Transport and Basic Services (If Provided)

Where SSWL or contractors provide accommodation, transport or canteen services to contract/migrant workers, the following minimum standards apply:

- Decent living conditions: adequate space, ventilation, lighting, and basic furnishings; separation and privacy for women where applicable.
- Safe water and sanitation: safe drinking water, functional toilets and bathing facilities, cleanliness and pest control.
- Freedom of movement: no curfews or restrictions that amount to coercion; reasonable safety/security measures only.
- Fire and life safety: emergency exits, fire extinguishers, evacuation plan, and periodic drills where applicable.
- Safe transport: licensed drivers, safe vehicles, reasonable commuting time, and emergency contact support.

Where such services are not provided, contractors remain responsible for meeting statutory obligations and ensuring workers are not placed in unsafe or exploitative living conditions.

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10. Freedom of Association, Communication and Respectful Workplace

SSWL respects workers' lawful rights to freedom of association and collective bargaining. Contract and migrant workers shall be treated with dignity and respect. Harassment, intimidation, abuse or discrimination is prohibited. Workers must be able to communicate concerns, access grievance channels, and obtain information about workplace rules and rights without fear.

11. Grievance Mechanism and Non-Retaliation

Contract and migrant workers must have access to SSWL's Grievance Mechanism and Non-Retaliation Policy, in addition to contractor grievance channels. Complaints may be raised confidentially and, where permitted, anonymously. Retaliation for raising concerns in good faith is strictly prohibited. SSWL will investigate significant allegations and ensure corrective actions and remediation.

12. Monitoring, Audits and Corrective Actions

SSWL will monitor contractor compliance through document reviews, site inspections and worker interviews. Findings will be captured in corrective action plans with timelines. Repeated or serious non-compliance may result in escalation, suspension or termination of contractor engagement. SSWL will maintain records to demonstrate implementation (e.g., audits, training records, wage verification, and grievance outcomes).

13. Roles and Responsibilities

- Managing Director/CEO: Approves the Policy and supports implementation resources.
- Head – HR: Policy owner; ensures deployment, contractor onboarding requirements, and worker awareness.
- Procurement: Ensures contractor contracts, due diligence and performance review include labour and welfare requirements.
- Compliance Officer: Supports audits, investigations, remediation and reporting.
- EHS Head / Plant Head(s): Ensure site controls, welfare facilities and safety standards are implemented and monitored.
- Contractors/Service Providers: Comply with this Policy and law; maintain evidence (wage/attendance registers, PF/ESI records, training logs); provide welfare facilities and support grievance access.

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14. Review and Updates

This Policy will be reviewed at least annually or earlier based on legal changes, audit outcomes, contractor risk profile changes, or stakeholder feedback.

Annexure A – Contractor Compliance Undertaking Template

To be signed by contractor/service provider management and submitted to SSWL during onboarding and renewal.

Contractor Name	
Registration/Licence No. (as applicable)	
Nature of Services / Work	
Work Location/Site	
No. of Workers Deployed (Estimated)	
Undertaking – Compliance	We confirm compliance with applicable labour laws and SSWL policies, including: minimum wages, timely wage payment, lawful overtime, PF/ESI and statutory benefits, prohibition of child/forced labour, ethical recruitment/no recruitment fees, no retention of original documents, accessible grievance mechanism, and non-retaliation.
Records and Audit Cooperation	We will maintain and provide required records (attendance, wages, statutory contributions, training, incidents) and cooperate with SSWL audits/inspections and worker interviews.
Subcontracting	We will not subcontract labour supply without prior written approval from SSWL and due diligence.
Authorised Signatory (Name, Designation, Signature, Date)	
SSWL Representative (Name, Designation, Signature, Date)	

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Annexure B – Welfare Facilities Checklist Template

Use for periodic site inspections for contract/migrant workforce welfare facilities.

Welfare Item	Minimum Standard	Evidence/Observation	Status/Action
Drinking Water	Safe drinking water available and accessible; maintained regularly.		
Sanitation	Clean toilets with adequate number; separate facilities as applicable; handwashing.		
Rest Area/Breaks	Designated rest area; compliance with break times.		
Canteen/Food	Safe, hygienic food arrangements where provided; potable water.		
First Aid/Medical	First aid kits and trained responders; emergency contact displayed.		
PPE Availability	PPE issued and used; replacement mechanism.		
Induction/Training	Records of induction and role training (language appropriate).		
Grievance Access	Grievance contacts displayed; workers know how to report.		
Accommodation (if provided)	Adequate space, ventilation, cleanliness, safety, privacy.		
Transport (if provided)	Safe vehicles, licensed drivers, emergency support.		

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