Steel Strips Wheels Limited

WORKING HOURS, OVERTIME & REST POLICY

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Address:

Steel Strips Wheels Ltd

S.C.O 49-50, Sector 26, Madhya Marg,

Chandigarh-160019, India

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1. Purpose

Steel Strips Wheels Limited ("SSWL" / "the Company") is committed to ensuring lawful, safe and humane working hours, rest periods and overtime practices. This Working Hours, Overtime & Rest Policy ("Policy") establishes minimum requirements for: (i) working hour limits and shift scheduling; (ii) rest breaks and weekly off; (iii) overtime approvals and compensation; and (iv) fatigue management controls. The Policy supports legal compliance and aligns with good practice expectations under the EcoVadis Labour & Human Rights theme (working conditions, working time, employee well-being and management systems).

2. Scope and Applicability

This Policy applies to all SSWL employees (permanent, fixed-term and trainees/apprentices, as applicable) across locations. It also establishes minimum expectations for contract workers deployed at SSWL sites through contractor obligations and monitoring.

Where different legal regimes apply (e.g., Factories Act, Shops & Establishments legislation, standing orders, or other applicable rules), SSWL will comply with the applicable requirements. Where more than one standard applies, SSWL will follow the more stringent requirement.

3. Definitions

For the purpose of this Policy:

- Working Hours: Time during which an employee/worker is required to be on duty and performing work, including shift time as recorded in attendance systems.
- Normal Working Day/Week: The standard daily/weekly working hours as per applicable law and SSWL schedules for the role/site.
- Overtime (OT): Hours worked beyond the normal daily or weekly working hours as defined by applicable law or notified schedules.
- Rest Break / Interval: A break from work (e.g., meal/rest) provided during the shift, not counted as active working time where applicable.
- Weekly Off / Weekly Rest: A full day of rest provided each week, with substitutions/compensatory off only as permitted by law.
- Spread-over: Total span from start of work to end of work in a day, including rest intervals, as defined by applicable law.

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- Fatigue: Reduced mental or physical performance capability resulting from sleep loss, extended work hours, inadquate rest, or demanding workloads, which can increase safety risks.
- Fitness for Duty: Being physically and mentally able to perform assigned work safely.

4. Policy Commitments

SSWL commits to:

- Comply with applicable working time laws and maintain accurate records of attendance, working hours and overtime.
- Provide adequate rest breaks, weekly off and safe shift schedules to prevent excessive fatigue and reduce health and safety risks.
- Ensure overtime is controlled, pre-approved (except genuine emergencies), voluntary where required, and paid at legally compliant rates.
- Prevent forced, coercive or abusive working time practices, including withholding of rest days or requiring "double shifts" without adequate rest.
- Provide accessible grievance channels for working time concerns and prohibit retaliation for reporting issues in good faith.
- Extend expectations to contractors and third parties working on SSWL premises through contractual requirements and monitoring.

5. Working Hours and Shift Scheduling

5.1 Standard Working Hours

SSWL defines standard working hours for each site/department considering operational requirements and legal limits. As a baseline for factory operations, SSWL will ensure adult worker hours do not exceed legal limits (e.g., 48 hours per week and 9 hours per day for factories, unless lawful exemptions apply).

5.2 Shift Scheduling and Rosters

Shift schedules will be planned to balance productivity with worker well-being and safety. Rosters will be communicated in advance where practicable, and changes will be managed through documented approvals. SSWL will avoid excessive consecutive night shifts and will implement suitable rotation practices based on operational feasibility and risk.

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5.3 Notice of Work Periods and Double Employment

Where legally required, SSWL will display/maintain notices of work periods and maintain registers of adult workers. Workers are not permitted to undertake double employment that could create legal non-compliance or safety risks while engaged at SSWL sites.

6. Breaks, Rest Periods and Weekly Off

6.1 Rest Breaks During the Workday

SSWL will provide rest/meal breaks as per applicable law and operational needs. For factory operations, no worker will be required to work for more than 5 hours continuously without a rest interval of at least 30 minutes, except where lawful exemptions apply. Supervisors must ensure breaks are actually taken and are not discouraged by workload pressures.

6.2 Spread-over (Daily Work Span)

SSWL will plan shifts so that the spread-over (inclusive of rest intervals) complies with applicable legal limits (e.g., not exceeding 10.5 hours per day for factories, unless extended through lawful approvals).

6.3 Weekly Off and Compensatory Rest

SSWL will provide at least one full day of rest per week. Where substitution is permitted (e.g., due to continuous operations), a substituted holiday will be provided as per law and notices/records will be maintained. SSWL will not schedule any worker for more than 10 consecutive days without a whole-day holiday, consistent with legal requirements for factories.

7. Overtime Governance (Limits, Approvals and Payments)

7.1 When Overtime is Permitted

Overtime may be used only when necessary for operational continuity, urgent customer requirements, breakdown/repair work, safety, or exceptional workloads. Overtime will not be used as a routine substitute for workforce planning.

7.2 Overtime Limits

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Overtime shall not exceed the maximum limits prescribed by applicable law and permits. Where legal limits differ by state or worker category, the stricter limit shall apply. SSWL will monitor total daily and weekly hours (including overtime) and will prevent excessive hours that could create safety risks.

7.3 Overtime Approvals (Maker-Checker Control)

Overtime must be pre-approved through a documented process (see Annexure A) involving the reporting manager and the designated approving authority (e.g., Department Head/Plant Head). HR/Time Office and Payroll will apply maker-checker controls to validate overtime entries against attendance records.

Emergency Overtime: In genuine emergencies (e.g., breakdown, safety incidents), overtime may be executed with immediate supervisor authorization and must be formally recorded and ratified within the next working day.

7.4 Overtime Compensation and Payslips

Overtime shall be compensated as per applicable law. For factory workers, overtime beyond 9 hours per day or 48 hours per week is payable at twice the ordinary rate of wages. Overtime payments will be reflected transparently in wage slips/payslips along with applicable deductions and statutory contributions.

7.5 Voluntariness and Non-Coercion

SSWL prohibits forced overtime. Where consent is legally required or where overtime may affect vulnerable workers, SSWL will ensure appropriate consent processes, safe working arrangements, and the right to raise concerns without retaliation.

8. Fatigue Management and Fitness for Duty

SSWL recognizes fatigue as a critical safety risk, especially in manufacturing operations involving machinery, material handling, driving, maintenance and night work. SSWL will implement reasonable fatigue risk controls including planning, supervision, and awareness.

Key controls include:

- Risk-based scheduling: Avoiding excessive consecutive shifts and managing night shift rotations where practicable.

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- Minimum rest between shifts: Ensuring adequate rest time between the end of one shift and the start of the next, consistent with safe practice and legal requirements.
- Break discipline: Ensuring rest breaks are taken; additional short breaks may be provided for hot work, high-heat environments, or highly repetitive work.
- Fitness for duty checks: Supervisors may remove a worker from safety-critical work if fatigue is observed or reported, and arrange safe reassignment/rest.
- Workload management: Monitoring peak workload periods and deploying additional resources instead of relying on prolonged overtime.
- Incident learning: Investigating incidents/near misses for fatigue as a potential contributing factor and applying corrective actions.
- Awareness and reporting: Encouraging workers to self-report fatigue, illness, or medication effects that could impair safe work.

9. Recordkeeping and Transparency

SSWL will maintain accurate working time records, including attendance, shift rosters, overtime approvals, overtime registers, and payroll evidence as required by law. Records will be retained for the legally mandated period (or longer based on internal audit requirements).

Employees can access payslips and raise payroll queries. Contract worker wage and overtime records may be reviewed through contractor monitoring processes.

10. Contract Workers and Third Parties

Contractors deploying workers at SSWL sites must comply with applicable working hour laws, provide rest breaks and weekly off, and pay overtime as required. SSWL may verify compliance through wage sheet checks, statutory records, worker interviews and site audits.

Where non-compliances are identified, SSWL may require corrective actions and apply contractual remedies including suspension/termination of work orders as permitted.

11. Grievance, Reporting and Non-Retaliation

Employees and workers can raise concerns related to excessive working hours, denial of breaks/weekly off, incorrect overtime payment, harassment or coercion through HR, line management, grievance committees or

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the whistleblowing/ethics channel (as applicable). SSWL prohibits retaliation against anyone raising concerns in good faith.

12. Monitoring, Audits and Corrective Actions

SSWL will monitor compliance through:

- Periodic review of attendance and overtime trends (hours, frequency, departments).
- Internal compliance checks against legal limits and approval documentation.
- EHS-led review of fatigue risk for safety-critical operations.
- Contractor labour compliance audits where applicable.
- Corrective and preventive action (CAPA) tracking for deviations.

13. Policy Breach and Disciplinary Action

Any deliberate falsification of working time records, unauthorized overtime, coercive overtime practices, or denial of mandated rest may result in disciplinary action and/or legal action as appropriate.

14. Review and Updates

This Policy will be reviewed at least annually or earlier if required due to changes in law, audit findings, or operational changes.

Annexure A – Overtime Approval & Declaration

Use this template (or equivalent system workflow) to document overtime approvals:

Employee/Worker Name	
Employee/Worker ID (if applicable)	
Department / Function	
Site / Location	
Date	
Shift Timing (Start – End)	
Overtime Hours Requested	
Reason for Overtime	

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Approving Authority (Name/Designation/Signature)	
Employee/Worker Declaration	I confirm the above overtime was worked and recorded accurately. I understand overtime is compensated as per law and Company policy.

Annexure B – Fatigue Risk Checklist

Supervisors may use this checklist for fatigue risk screening (especially for safety-critical work):

- Has the worker completed long hours (including overtime) in the last 48 hours?
- Has the worker had adequate sleep/rest in the last 24 hours?
- Is the worker reporting illness, medication use, or symptoms affecting alertness?
- Is the work assignment safety-critical (e.g., operating machinery, driving, working at height)?
- Has the worker taken planned breaks and hydration as required?
- Are there any signs of fatigue (slow reactions, reduced attention, irritability, micro-sleeps)?
- If risk identified: reassign to low-risk tasks, provide rest, and document the action taken.

Prepared By: **Lead PM & Strategy**	**Approved By:** STEEL STRIPS WHEELS LTD. ★ Chandigarh ★ **General Manager – P&A**

** End of Document**

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