

EPL Ltd.
(Formerly known as Essel Propack Limited)

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First Issued Date: 10.10.2020	Revision No.: 01	Revision Date: 10.10.2022	Effective Date: 10.10.2022	Next Review: 10.10.2024
Applicable Location:	Applicable to all units and offices of EPL Limited			
Retention Limit	Permanent with continuous updation			

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Approved By	Mr. Dileep Joshi	Global CHRO	

Review Details

Date	Revision Details	Page No
10.10.2020	First Release	--
10.10.2022	Policy was reviewed by the policy formulation authorities. We have reworded the policy to adhere to our standard policy format while keeping the scope, purpose, coverage and implementation details intact as per the initial policy. policy stands revised and effective for next 2 years	All

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Introduction

EPL Ltd is committed to the highest levels of ethics and integrity in the way that EPL Ltd conducts business. We understand that this is crucial to our continued success and reputation.

Background:

Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979
Bonded Labour System (Abolition) Act, 1976
Child Labour (Prohibition & Abolition) Act, 1970
Contract Labour (Regulation and Abolition Act), 1970
Articles 21 and 23 of Constitution of India
Universal Declaration of Human Rights 1948
Supplementary Convention on Abolition of Slavery, Slave Trade and Institutions and Practices similar to Slavery 1956
International Covenant on Civil and Political Rights (ICCPR) 1966
ILO Abolition of Forced Labour Convention (No.105) (1957)
Council of Europe Convention on Action against Trafficking in Human Beings of 2005
Discrimination (Employment Occupation) Convention (No.111)
Equal Remuneration Convention (No.100)
EU Directive on Preventing and Combating Trafficking in Human Beings (2011/36/EU)
EU Directive Regarding Disclosure of Non-financial and Diversity Information (2014/95/EU)
European Convention on Human Rights (1953)
Forced Labour Convention (No. 29)
Freedom of Association and Protection of Right to Organised Convention (No.87)
Abolition of Forced Labour Convention No. 105,
International Bill of Human Rights
Minimum Age Convention, 1973 (No. 138)
Right to Organise and Collective Bargaining Convention (No.98)
UNGC – Principle 4: Businesses should uphold elimination of all forms of forced and compulsory labour
United Nations Global Compact
United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Palermo Protocol
Worst Forms of Child Labour Convention, 1999 (No. 182)

SCOPE

This policy applies to all people working with EPL Ltd in various capacities across all EPL offices, manufacturing units and subsidiaries, and includes all business associates

Policy

EPL Ltd. does not engage and entertain:

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Approved by:

Dileep Joshi
CHRO (Global)



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- Forced labour which refers specifically to extracting work or service from another under threat of penalty and for which that other person has not offered themselves voluntarily
- EPL strictly adheres to human manners for employment and strictly refrains from engaging in indicators described by ILO as forced labour noted below:
 - ♦ The ILO indicators of forced labour are (i) abuse of vulnerability; (ii) deception; (iii) restriction of movement; (iv) isolation; (v) physical and sexual violence; (vi) intimidation and threats; (vii) retention of identity documents; (viii) withholding of wages; (ix) debt bondage; (x) abusive working and living conditions; and (xi) excessive overtime
- All work is conducted on a voluntary basis, and not under threat of any penalty or sanctions
- The right of employees and workers:
 - To terminate their employment after legal notice shall be and is respected
 - To leave the workplace and factory after their shift shall be and is respected (except in cases of continuous manufacturing processes, if any)
- All employees and workers are explained the hiring process at the time of employment. Hiring policy includes:
 - A clear statement against forced labour
 - A process, designed to avoid any form of compulsory or forced labour

Definition and explanation

“Forced Labor” or compulsory labour means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.

“Human Trafficking” means the act of recruiting, harboring, transporting, providing or obtaining a person for forced labor or commercial sex acts through the use of fraud, coercion (e.g., threats of serious harm or physical restraint or abuse or threatened abuse of the legal system) or deception.

Implementation

- This policy is publicly available throughout the Company and clearly communicated to all employees in a manner in which it can be understood through induction programmes, policy manuals and intranet portals
- *Through supervisors of contract workers*
- Translating communications into all relevant languages and distributing them at worksites, on and off the company’s premises; making it publicly available through virtual platforms like websites
- Regular monitoring and keeping of records is undertaken by expert internal and third party auditors
- Provision for accidental incidences the company can be highlighted using the ‘Speak Up system’ through which the aggrieved employee / worker can express the issues without fear and adverse repercussion

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Communication, Responsibility, Authority and Accountability and Monitoring Process:

Communication:

- Stakeholder's communication is undertaken from time to time (for ex. Employees – induction and every year through training, vendors and supply chain at the time of initial engagements)
- Communicate the policy internally and externally
- EPL Ltd., No Forced labour commitments, efforts and statements, consistent with this Policy, as part of company's Annual Sustainability Report. This reporting covers cross references the UN Guiding Principles Reporting Framework

Responsibility and Accountability:

- Regional HR Heads and Location Human Capital Team
- Human Rights Committee (comprising of the Global CHRO, Regional HR Head, Local Unit Head)

Monitoring Process:

- Agenda and discussion during Works Committee Meetings and Focused Group Discussion (FGD) which are conducted monthly and/or quarterly
- A formal report should be forwarded to the Human Rights Committee on a six monthly basis
- All employees, supervisors and staff are extended adequate information and training on the subject. Anyone who has doubt about a potential likelihood of human rights violation incidence in spite of all precautions is expected and should report the same immediately through the Speak Up Portal
- Communication about the policy is covered through different channels of internal communication such as – induction, awareness sessions, emailers, internal magazine etc. to ensure 100% employee awareness
- Communication access covering all employees and periodic monitoring enables quantitative and qualitative outreach

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