

	Policy Name	Human Rights Policy
	Policy Number	SSWL/HR/17
	Effective date of Issue	1 st Jan, 2024
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1. Purpose

The Human Rights policy is implementation processes of deploying human rights practices, working conditions, employment term & condition for Steel Strips Wheels limited.

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2. Scope

This policy applies to all employees and relevant third parties of the Company and shall be communicated to them at the outset of our business relationship and as appropriate thereafter. In cases when this policy's provisions are superseded by local laws, customs, standards, or other policies, the more stringent guidelines must be followed and vis-à-vis.

3. Practices:

i. Ethical & Professional standards of employment: -

Forced labor shall not be used, including bonded and trafficked labor. Working for SSSWL is voluntary and employees are free to leave company upon their contractual or statutory notice period. As part of the hiring process, employee must be provided with a written employment agreement that contains a description of terms and conditions of employment in a language they can understand.

ii. Prevention of underage labor and protection of young workers: -

SSWL does not hire people under the age of 18 years. In addition, young workers between the ages of 16 and 18, also not allowed to work in SSWL. If an underage worker (below 18 years old) is discovered working on a site, either as a direct employee or a subcontracted worker, the contract must be terminated immediately. In addition, the SSWL must take action to remediate any negative consequence of the underage work or contract termination, such as providing social, material or educational assistance.

The use of legitimate workplace apprenticeship learning programs, which comply with all laws and regulations, is supported. Employment of the apprentice trainee will be given and governed as per apprentice act ,1961. In this also will not allow under 18.

iii. Working Hour: -

Working hours are limited to a maximum of 48 hours in week including overtime, & 8 hour per shift including break time, except in emergency or extraordinary situation. A working week / hour is not to exceed the maximum limit set by local law. Employee must have at least one day off every seven days, which is 24 consecutive hours off in the same calendar day after six consecutive days of work.

Overtime is on a voluntary basis or in the case of emergency or extraordinary situations, upon management request when volunteers are not sufficient to cover the business need. In any case,

Overtime shall be in compliance with local legislation and collective bargaining agreements, including daily and monthly overtime limits. Breaks must comply with local laws. In the absence of local laws, HR must conduct an ergonomic assessment to define suitable break periods.

iv. Fair wages and benefits: -

SSWL, seek to offer a competitive compensation and benefits package based on the qualification, Experience, competency of employee and industry survey results in the regions where we operate. At a minimum, SSWL complies with all applicable wage laws and collective bargaining agreements, including minimum wages, holidays, vacation, personal leave, and legally mandated benefits.

All time worked must be paid. Employee must be paid in a timely manner and in accordance with local laws including in the case of resignation. All employees must receive an itemized pay slip for every pay period, showing the basis on which they are paid. Operators and non-exempt employees are compensated for overtime and work on public holidays as per the law. When a contract is terminated, all wages due up until the last day of work must be fully paid.

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v. Wage deductions are permitted for the following situations: -

- Mandatory taxes and social charges, in line with the applicable laws and regulations.
- Deductions for services provided, such as the canteen, transportation, insurance, dormitory facilities or loan repayments under the condition that the service is optional.
- Late arrival or work suspension due to disciplinary measures; the wage deduction must be proportional to the reduction of working time.
- Termination with a notice period not respected – the wage deduction is proportional to the reduction of working time.
- For all other employee categories, if authorized by the law, a financial penalty can be applied in line with the employment contract and legal law.

The sum can be deducted directly from the wages, up to a maximum of 60% of the monthly wage. All wage deductions must be clearly itemized on the wage slip. Further deductions from wages are not permitted.

vi. Fair treatment and anti-harassment: -

All Employees must be treated fairly. In line with SSWL Code of Conduct, SSWL does not tolerate any mistreatment of an employee, Customer, supplier or by another employee and/or manager, which may include verbal, psychological, sexual or physical bullying and harassment, or any behavior which disrupts or interferes with another's work performance or that creates an intimidating, offensive or hostile work environment. Non-discrimination In accordance with SSWL's Code of Conduct, we maintain a culture free of discrimination and harassment, where individuals are treated with respect and dignity, regardless of their race, color, ethnic background or national origin, age, gender, physical characteristics, disability, political opinion or affiliation, religion, gender identity and expression, sexual orientation and HIV/AIDS, marital or maternity status or union affiliation, or any other non-job-related personal characteristic. All individuals can report any abuse or inappropriate behavior.

SSWL is committed to attracting, developing and retaining its workforce respecting diversity and providing equal opportunities to all employees based on their behavior, skill and abilities. Decisions concerning recruitment and selection, job assignment, remuneration, rewards, opportunity for training and development, and transfer or promotion must be based on a fair assessment of an individual's qualifications, skills and ability, as well as past and current performance.

vii. Freedom of association: -

Employees are free to choose whether or not to organize and join lawful associations including trade unions. SSWL does not, restrict or interfere with Employee' efforts to join a lawful association of their choice, and this includes any behavior that involves threatening, interrogating, spying on, penalizing or discriminating workers.

In addition, SSWL does not interfere with or finance (directly, indirectly or through in-kind gifts or benefits) any employee representative, organization or trade union. SSWL respects the right of all workers to associate freely, to form and join trade unions of their own choice, to bargain collectively and to engage in peaceful assembly, in accordance with ILO (International Labor Organization) Conventions, and adhering to other global labor standards aligned with OECD, UNDP and UNGC. Employees and their representatives shall be able to communicate openly with each other and with management regarding working conditions without fear of reprisal, intimidation, discrimination or harassment.

viii. Working conditions and employee well-being :-

SSWL is committed to providing a safe and healthy work environment conducive to all Employee well-being by meeting international standards for health and safety management systems on top of local and international legal requirements. Health

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and safety related information must be clearly posted in the facility and workers must be provided with an appropriate workplace health and safety training in a language they can understand.

Company sees following steps as essential:

- a. Physical and mental health of stakeholders involved in workplaces of the Company (employees, contractors, etc):**
 - i. Making available clean, potable water in the workplace
 - ii. Supplying protective equipment and training necessary to perform tasks safely
 - iii. Ensure that company operations do not adversely impact long term health of individuals
 - iv. Not subject pregnant or breastfeeding women to conditions that would be harmful for them. Company will grant breastfeeding women reasonable breaks and a designated area where feasible for breastfeeding during work hours.
 - v. When operating in areas where contagious diseases are endemic, providing appropriate information and training to mitigate risk
- b. Maternity related:** Company will
 - i. Provide women with maternity leave for the period as prescribed under the Maternity Benefit Act, without risk of losing their employment or responsibilities (being reviewed to further enhance the maternity leave beyond prescribed period).
- c. Injury & illness:** SSWL encourages proactive attentive and safe behavior in the workplace and encourages employees suggestions to eliminate the potential causes of accidents or injury.
 - i. Provide emergency care as necessary
 - ii. Give reasonable time to recover from the injury or illness
 - iii. When the individual returns, Company will ensure that injured/ ill individuals are given appropriate duties and assistance while they recover from the injury or illness. This might include making reasonable adjustments to the workplace, although these should not cause the business unjustifiable hardships.

4. Privacy: -

SSWL committed to safeguarding the privacy of the personal data we gather concerning prospective, current, former employees, as well as temporary workers, contract workers, independent contractors, and consultants. It is SSWL's policy to comply with the privacy legislation within each jurisdiction in which SSWL operates.

i. Reporting violations and non-retaliation: -

SSWL promotes a 'speak up' culture, allowing everyone to express, in good faith and without fear of retaliation, any concern they might have of a potential violation of SSWL's Code of Conduct, applicable laws, the Company's policies or values.

All employees must be made aware of the Company's reporting channels and which are available to them. No one who speaks up in good faith shall suffer any acts of retaliation such as intimidation, harassment, adverse employment or career consequences.

ii. Modern Slavery: -

We always work to the highest professional standards and comply with all laws and regulations applicable to our business. We expect the same high standards from those parties with whom we engage and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chain. We work to embed throughout our operations a robust risk management framework to ensure we effectively analyze and manage the risks to our

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business. This includes analyzing the risk of inadvertently working with suppliers who do not share our commitment to anti-slavery and human trafficking.

iii. **Management System: -**

A management system is defined at corporate level and deployed on all SSWL sites to mitigate risks and ensure compliance with applicable laws and regulations and SSWL's Code of Conduct. When required to comply with more stringent local regulations, as applicable, SSWL sites also have the obligation to define and maintain associated local procedures and to communicate them to their Employees and other affected parties. They must also have a process in place to ensure conformity to this procedure.

5. **Roles and responsibilities: -**

Site Management is accountable for local compliance with this procedure and the Location HR Head is responsible for supporting its deployment.

6. **Risk management Major: -**

SSWL sites must conduct regular risk assessments to identify the labor and human rights risks associated with local operations and supply chain. The risk assessment must include psychological risks such as stress and burnout. Identified risks must be assessed according to their likelihood and impact, and the appropriate corrective actions and controls put in place.

7. **Customer requirements: -**

Customer requirements shall be analyzed and managed in accordance with Quality Policy and norms.

8. **Supply chain management: -**

SSWL entities must ensure that their management of suppliers and subcontractors also follow the labor and human rights elements detailed in this procedure through appropriate local deployment(s). The management of suppliers is described, amongst others.

9. **Human Rights Protection**

SSWL protects and promotes human rights of all stakeholders, including employees, partners, and customers. SSWL established the Human Rights Charter in Aug 2023, which adheres with several international norms on human rights and labor. SSWL produced eight primary bullet points in the charter to convey the company's commitment to human rights in all workplaces in line with Code of Conduct.

Below are the 8 Principles:

The code is based on eight principles that have been identified through research. These 8 ethical principles are designed to help employees recognize and deal with ethical issues in their work that circulate around these 8 principles. These help to create a cohesive understanding of the boundaries within an organization and set standards for interacting with external stakeholders.

1. **Fiduciary Principle:** Protect and safeguard company's intellectual property & confidential information
2. **Property Principle:** No company asset should be used for personal purpose

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3. **Reliability Principle:** Employees are expected to act with integrity, honesty and ethics
4. **Transparency Principle:** Ensure transparency in the business communication, Accuracy and Reliability in records
5. **Dignity Principle:** Employee's personal dignity is respected and protected.
6. **Fairness Principle:** Implement fairness while dealing with our shareholders, employees, customers, suppliers and all our associates
7. **Citizenship Principle:** Employee must comply with all the applicable laws, regulations, rules of all govt. bodies.
8. **Responsiveness Principle:** Charitable contributions and donations, whenever made, shall be made without demand or expectation of business return.

We're also addressing human resource risks by urging employees to follow human rights principles and guidelines by educating on human rights charter.

10. Training and communication related to Human Rights: -

Site have the obligation to provide an annual refresher on SSWL's Code of Conduct to all employees, in line with guidelines provided by the Corporate Compliance & Ethics department. Local training can be based on the Company's Code of Conduct e-learning or other learning aids developed and made available by the Corporate/ plant Compliance & Ethics group.

By providing relevant training and synchronizing the behavior of its employees, SSWL would guarantee adherence to fundamental labour principles, such as the ban on child labour, forced labour, freedom of association, the right to collective bargaining, and protection from discrimination ((based on age, gender, marital status, differently abled, race, national/ regional origin, ancestry, indigenous status, personal beliefs, religion & spiritual practice, political affiliation, sexual orientation and HIV/AIDS).

11. Monitoring potential human rights violation risks of employees:

i. Investigation Process:



ii. Ethics Violation Reporting Channel:

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