



## RAVIRAJ FOILS LIMITED. EHS PROCEDURE

|                                                                                      |                |               |
|--------------------------------------------------------------------------------------|----------------|---------------|
| HR DEPARTMENT                                                                        | PAGE NO        | Page 1 of 4   |
| TITLE: Policy on Forced Labour (Clause 10.3 of the Aluminium Stewardship Initiative) | DOC. NO.       | RFL/EHS/PR/87 |
|                                                                                      | REV. NO.       | 00            |
|                                                                                      | EFFECTIVE DATE | 20/08/2024    |
|                                                                                      | REVIEW DATE    | 19/08/2025    |
|                                                                                      | SUPERSEDES     | NIL           |

### 1. Purpose

This policy establishes the commitment of Raviraj Foils Ltd. to eradicate all forms of forced labour within its operations and supply chains, aligning with the Aluminium Stewardship Initiative (ASI) Performance Standard. This includes addressing issues related to human trafficking, debt bondage, and other practices that may coerce or exploit workers.

### 2. Scope

This policy applies to all employees, contractors, suppliers, recruitment agencies, and other business partners associated with Raviraj Foils Ltd. across all facilities.

### 3. Policy Statements

#### 3.1 Zero Tolerance for Forced Labour

3.1.1 Raviraj Foils Ltd. shall neither engage in nor support any form of forced labour.

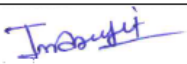
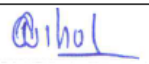
3.1.2 The company shall not engage in or support human trafficking in any form, directly or indirectly, through contracted employment or recruitment agencies.

#### 3.2 Prohibition of Exploitative Practices

3.2.1 No worker shall be required to pay any form of deposit, recruitment fee, or other charges to secure employment.

3.2.2 Migrant workers shall not be required to lodge deposits or security payments at any time.

3.2.3 Raviraj Foils Ltd. shall not hold workers in debt bondage or force them to work to pay off a debt.

|                                                                                     |                                                                                     |                                                                                       |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| PREPARED BY:                                                                        | CHECKED BY:                                                                         | APPROVED BY:                                                                          |
|  |  |  |
| Safety Officer                                                                      | Sr. EHS Officer                                                                     | HR - Head                                                                             |
| DATE: 20/08/2024                                                                    | DATE: 20/08/2024                                                                    | DATE: 20/08/2024                                                                      |

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3.2.4 The freedom of movement of workers shall not be restricted in the workplace or on-site housing unless such restrictions are legal, reasonable, necessary, timebound, and proportionate.

3.2.5 The company shall not retain original copies of workers' identity papers, work permits, travel documents, or training certificates.

3.2.6 Workers shall have the freedom to terminate their employment at any time without penalty, given reasonable notice.

### 3.3 Modern Slavery Statement

3.3.1 Raviraj Foils Ltd. shall publicly disclose an annual Modern Slavery Statement detailing the actions taken to address modern slavery risks within its operations and supply chains.

## 4. Implementation and Compliance

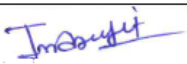
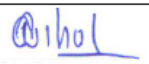
### 4.1 Risk Assessment

4.1.1 The company shall conduct regular and ongoing risk assessments to identify and mitigate risks of forced labour and human trafficking within its operations and supply chains.

4.1.2 Special attention shall be given to vulnerable groups, including migrant workers and minorities, who may be at higher risk of exploitation.

### 4.2 Recruitment and Hiring Practices

4.2.1 Raviraj Foils Ltd. shall implement clear, transparent recruitment processes, including stringent contracting arrangements with recruitment and employment agencies.

|                                                                                     |                                                                                     |                                                                                       |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| PREPARED BY:                                                                        | CHECKED BY:                                                                         | APPROVED BY:                                                                          |
|  |  |  |
| Safety Officer                                                                      | Sr. EHS Officer                                                                     | HR - Head                                                                             |
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NIL

4.2.2 The company shall prohibit the solicitation or acceptance of any payment or bribe from job seekers or from labour or recruitment agencies by anyone employed by the company.

#### 4.3 Supplier and Partner Engagement

4.3.1 Suppliers, sub-contractors, and business partners, including employment or recruitment agencies, shall be required to adhere to this policy as part of their contractual obligations.

4.3.2 The company shall engage in regular audits and due diligence to ensure compliance with this policy across its supply chain.

#### 4.4 Training and Awareness

4.4.1 Relevant personnel, including human resource managers, auditors, and supply chain managers, shall receive training on identifying and mitigating risks related to forced labour and human trafficking.

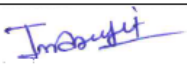
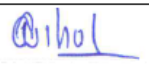
4.4.2 Awareness programs shall be conducted for all workers to inform them of their rights and the company's policies against forced labour.

#### 4.5 Grievance Mechanisms

4.5.1 A grievance mechanism shall be established to allow workers to report any concerns related to forced labour or human trafficking without fear of retaliation.

4.5.2 The company shall ensure that corrective action is taken promptly in response to any reported violations, including providing support for affected workers.

#### 4.6 Continuous Improvement

| PREPARED BY:                                                                        | CHECKED BY:                                                                         | APPROVED BY:                                                                          |
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|  |  |  |
| Safety Officer                                                                      | Sr. EHS Officer                                                                     | HR - Head                                                                             |
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4.6.1 Raviraj Foils Ltd. is committed to continuously reviewing and improving its policies and practices to prevent forced labour and human trafficking.

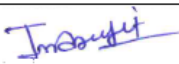
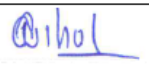
4.6.2 The company shall engage with relevant stakeholders, including NGOs, labour unions, and governmental bodies, to strengthen its approach to addressing forced labour.

### 5. Revision Statement

This policy shall be reviewed periodically to ensure alignment with the latest industry standards, legal requirements, and best practices. Any revisions shall be approved by senior management and communicated to all relevant stakeholders.

### 7. Revision History:

| Sr. No. | Issue Date | Reason for revision | Revision No. | Obsolete Doc No. |
|---------|------------|---------------------|--------------|------------------|
| 1       | 20/08/2024 | First Issue         | 00           | -                |
|         |            |                     |              |                  |
|         |            |                     |              |                  |

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