



## RAVIRAJ FOILS LIMITED. EHS PROCEDURE

|                                                           |                |               |
|-----------------------------------------------------------|----------------|---------------|
| HR DEPARTMENT                                             | PAGE NO        | Page 1 of 4   |
| TITLE: Working Time Policy (Clause 10.8 - ASI Compliance) | DOC. NO.       | RFL/EHS/PR/92 |
|                                                           | REV. NO.       | 00            |
|                                                           | EFFECTIVE DATE | 20/08/2024    |
|                                                           | REVIEW DATE    | 19/08/2025    |
|                                                           | SUPERSEDES     | NIL           |

### 1. Purpose

The purpose of this policy is to establish clear guidelines for managing working time, including regular hours, overtime, and leave, in compliance with Clause 10.8 of the Aluminium Stewardship Initiative (ASI) Performance Standard. This policy aims to ensure safe, humane, and lawful working conditions for all Workers at Raviraj Foils Ltd.

### 2. Scope

This policy applies to all Workers at Raviraj Foils Ltd., including full-time, part-time, temporary, and contract employees at all Facilities.

### 3. Policy Statement

Raviraj Foils Ltd. is committed to adhering to all Applicable Laws and industry standards related to working time, including overtime hours, public holidays, and paid annual leave. The company will:

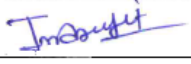
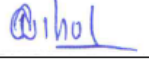
**Legal Compliance:** Comply with Applicable Law and industry standards on working hours, including overtime, public holidays, and paid annual leave.

**Minimum Rest Period:** Ensure that all Workers have at least one day off per seven-day period on average.

**Workday Limit:** Ensure that the average workday does not exceed 8 hours over a six-month period, taking into account the needs of rotational shift work where applicable.

### 4. Implementation

**Overtime and Rest Days:** Overtime will be voluntary and not mandatory, except as part of a legally recognized collective bargaining agreement. Workers will not be

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|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| PREPARED BY:                                                                        | CHECKED BY:                                                                         | APPROVED BY:                                                                          |
|  |  |  |
| Safety Officer                                                                      | Sr. EHS Officer                                                                     | HR - Head                                                                             |
| DATE: 20/08/2024                                                                    | DATE: 20/8/2024                                                                     | DATE: 20/08/2024                                                                      |

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forced to work overtime under threat of penalty, dismissal, or denunciation to authorities. Overtime hours will be limited to a maximum of 12 hours per week, ensuring that total working hours do not exceed 60 hours per week, including overtime.

**Recording and Monitoring:** Raviraj Foils Ltd. will implement a robust system for recording and monitoring working hours, overtime, and leave entitlements. Managers and Workers will be trained to use this system effectively to ensure accurate tracking and compliance with this policy.

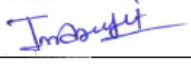
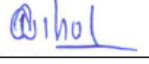
**Leave and Breaks:** Weekly rest days and paid annual leave will be provided as part of normal Worker agreements. In cases where shift rosters prevent Workers from receiving one rest day in seven, alternative arrangements will be agreed upon, such as compensatory time off.

**Risk Assessment:** A risk assessment will be conducted regularly to identify any potential risks of exceeding maximum working hours or breaching leave entitlements. This assessment will help the company implement necessary controls to prevent such occurrences.

### 5. Monitoring and Review

**Regular Reviews:** The working time policy will be reviewed regularly to ensure ongoing compliance with legal standards, industry practices, and the ASI Performance Standard. The company will monitor working hours, overtime, and leave practices to identify and address any issues or areas for improvement.

**Feedback and Improvement:** Workers are encouraged to provide feedback on working time practices. The company will use this feedback, along with the results

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| Safety Officer                                                                      | Sr. EHS Officer                                                                     | HR - Head                                                                             |
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of audits and assessments, to continuously improve the policy and its implementation.

### 6. Roles and Responsibilities

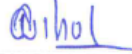
**Management:** Responsible for ensuring compliance with this policy, including the accurate recording of working hours and overtime. Management must also ensure that Workers are informed of their rights and the terms of their employment related to working time.

**Workers:** Expected to understand their rights regarding working time and report any concerns or discrepancies to their supervisors or through the company's grievance mechanisms.

**HR and Payroll Departments:** Responsible for maintaining accurate records of working hours, overtime, and leave, ensuring compliance with this policy, and providing clear documentation to Workers.

### 7. Revision History:

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

| PREPARED BY:                                                                        | CHECKED BY:                                                                         | APPROVED BY:                                                                          |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
|  |  |  |
| <b>Safety Officer</b>                                                               | <b>Sr. EHS Officer</b>                                                              | <b>HR - Head</b>                                                                      |
| <b>DATE:</b> 20/08/2024                                                             | <b>DATE:</b> 20/8/2024                                                              | <b>DATE:</b> 20/08/2024                                                               |

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**PREPARED BY:**

**CHECKED BY:**

**APPROVED BY:**

*Indrajit*

*Chandra*

*@ihol*

**Safety Officer**

**Sr. EHS Officer**

**HR - Head**

**DATE:** 20/08/2024

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