



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

HR DEPARTMENT

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TITLE: Human Rights Impact Assessment Procedure

DOC. NO.

RFL/EHS/PR/108

REV. NO.

00

EFFECTIVE DATE

20/08/2024

REVIEW DATE

19/08/2025

SUPERSEDES

NIL

1. Purpose

This procedure establishes a systematic approach for assessing human rights impacts associated with Raviraj Foils Ltd.'s operations and supply chain to ensure compliance with national laws and international human rights standards.

2. Scope

This procedure applies to all operations and business relationships of Raviraj Foils Ltd., including direct operations, supply chain, and other business partnerships.

3. Definitions

- **Human Rights Impact Assessment (HRIA):** A process to identify, understand, assess, and address the adverse impacts of business activities on the rights and well-being of individuals.
- **Stakeholders:** Individuals or groups affected by Raviraj Foils Ltd.'s operations, including employees, suppliers, customers, and local communities.

4. Responsibilities

- **HR Head:** Oversee the implementation of the human rights assessment process and ensure integration of findings into company policies.
- **EHS Manager:** Collaborate with the HR department to address any environmental issues that overlap with human rights concerns.
- **Compliance Officer:** Ensure legal compliance in all jurisdictions where Raviraj Foils operates.
- **Department Heads:** Facilitate assessments within their respective areas and ensure that their teams comply with human rights policies.

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Sr. EHS Officer

HR - Head

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5. Procedure

5.1 Preparation

- **Develop Assessment Framework:** Create a framework that includes human rights categories relevant to Raviraj Foils' operations (e.g., labour rights, community impact).
- **Identify Stakeholders:** List all potential internal and external stakeholders affected by the operations.

5.2 Assessment Execution

- **Data Collection:** Gather data through surveys, interviews, and on-site inspections to evaluate current human rights practices.
- **Risk Identification:** Identify areas where the company's activities potentially impact human rights.
- **Impact Analysis:** Analyze the data to determine the severity and extent of each identified risk.

5.3 Reporting

- **Document Findings:** Prepare a report detailing the outcomes of the assessment, including both positive impacts and areas for improvement.
- **Review and Approval:** The report is reviewed by the HR Head and approved by senior management.

5.4 Action Plan Development

- **Develop Corrective Measures:** For each identified risk, develop an action plan to mitigate negative impacts.
- **Implementation:** Assign responsibilities and timelines for implementing the action plans.

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5.5 Monitoring and Review

- **Ongoing Monitoring:** Regularly monitor the implementation of action plans and the effectiveness of interventions.
- **Annual Reviews:** Conduct annual reviews of the human rights assessment process to identify new risks and make necessary adjustments to the procedure.

5.6 Communication

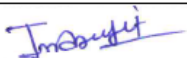
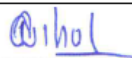
- **Internal Communication:** Share findings and action plans with all employees to foster transparency and accountability.
- **External Communication:** Communicate relevant aspects of the human rights impact assessment to external stakeholders, including the local community and regulatory bodies, as appropriate.

6. Documentation and Records

Maintain comprehensive records of all human rights assessments, including data collected, reports generated, decisions made, and actions taken. These documents should be stored securely and be accessible for audits and reviews.

7. Training

Provide regular training for employees involved in the assessment process to ensure they are knowledgeable about human rights issues and competent in executing their responsibilities under this procedure.

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Human Rights Risk Assessment Table

Risk Area	Specific Issue	ASI/GRI Criteria	Risk Level	Mitigation Measures
Labour Practices	Child Labour	ETI Code, ASI Criteria	High	Implement strict age verification processes in recruitment. Conduct supplier audits to ensure compliance throughout the supply chain.
	Forced Labour	ETI Code, ASI Criteria	High	Establish a zero-tolerance policy for forced labour. Provide training on ethical recruitment practices. Implement worker grievance mechanisms.
	Fair Wages	GRI Standards, ETI Code	Medium	Regularly review wage practices to ensure compliance with national minimum wage laws. Adjust wages based on living wage benchmarks.
Health and Safety	Workplace Safety	ASI Criteria, ETI Code	High	Improve safety protocols, conduct regular risk assessments, and safety

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Risk Area

Specific Issue

ASI/GRI Criteria

Risk Level

Mitigation Measures

training. Invest in better protective equipment.

Occupational Health

GRI Standards, ASI Criteria

High

Regular health screenings, reduce exposure to hazardous materials, improve ventilation systems, and provide health-related education.

Environmental Impact

Emissions and Effluents

ASI Criteria, GRI Standards

High

Implement advanced filtration and treatment systems. Regular environmental impact assessments and adherence to emission reduction targets.

Resource Use

ASI Criteria, GRI Standards

Medium

Optimize resource use, increase recycling rates, and switch to renewable energy sources where possible.

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Risk Area

Specific Issue

ASI/GRI Criteria

Risk Level

Mitigation Measures

Community Impact

Land Rights

ASI Criteria, GRI Standards

Medium

Engage with local communities to ensure land use does not infringe on rights. Implement community consultation processes.

Impact on Local Communities

ASI Criteria, GRI Standards

Medium

Conduct social impact assessments. Develop community engagement programs and support local community initiatives.

Ethical Business Practices

Corruption and Bribery

ETI Code, GRI Standards

High

Anti-corruption training for employees. Regular audits and transparency in financial dealings. Implement a whistleblower policy.

Supply Chain Ethics

ETI Code, ASI Criteria

High

Extend code of conduct to all suppliers. Conduct regular supplier evaluations and audits to ensure compliance.

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Risk Area

Specific Issue

ASI/GRI Criteria

Risk Level

Mitigation Measures

Governance

Transparency and Reporting

GRI Standards, ASI Criteria

Medium

Increase disclosure and transparency in reporting practices. Engage third-party auditors to verify reports and disclosures.

Stakeholder Engagement

GRI Standards, ASI Criteria

Medium

Implement a formal stakeholder engagement process, including regular stakeholder meetings and feedback mechanisms.

Human Rights Impact Management Plan for Raviraj Foils Ltd.

1. Purpose

To manage human rights impacts associated with Raviraj Foils Ltd.'s operations, ensuring risks to affected populations and organizations are minimized while safeguarding legitimate commercial confidentiality.

2. Scope

This plan applies to all business operations, supply chain activities, and partnerships of Raviraj Foils Ltd., focusing on labour practices, health and safety, environmental impact, community impact, and governance.

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3. Objectives

1. Prevent and mitigate adverse human rights impacts across operations and supply chains.
2. Promote ethical practices and compliance with ASI, GRI, and ETI standards.
3. Maintain transparency while respecting legitimate commercial confidentiality.

4. Risk Management Framework

Risk Area	Specific Issue	Risk Level	Mitigation Measures	Responsible Team
Labour Practices	Child Labour	High	- Strict age verification during recruitment. - Supplier audits for compliance.	HR and Compliance Teams
	Forced Labour	High	- Zero-tolerance policy. - Ethical recruitment training. - Worker grievance mechanisms.	HR and Supply Chain Teams
	Fair Wages	Medium	- Periodic wage reviews against national laws and living wage benchmarks.	HR Team
Health and Safety	Workplace Safety	High	- Enhance safety protocols and conduct regular training.	Safety and Operations Teams

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Risk Area

Specific Issue

Risk Level

Mitigation Measures

Responsible Team

- Invest in protective equipment.

Occupational Health

High

- Provide health screenings, improve ventilation, and reduce exposure to hazards.

EHS Team

Environmental Impact

Emissions and Effluents

High

- Implement advanced treatment systems.
- Conduct environmental impact assessments.

Environmental Team

Resource Use

Medium

- Optimize resource use, increase recycling, and transition to renewable energy.

EHS and Procurement Teams

Community Impact

Land Rights

Medium

- Engage with communities to ensure land use respects rights.
- Develop consultation mechanisms.

CSR and Compliance Teams

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Risk Area

Specific Issue

Risk Level

Mitigation Measures

Responsible Team

Impact on Communities

Medium

- Conduct social impact assessments and support community initiatives.

CSR Team

Ethical Practices

Corruption and Bribery

High

- Anti-corruption training.
- Regular audits and whistleblower mechanisms.

Legal and Compliance Teams

Supply Chain Ethics

High

- Extend code of conduct to suppliers and conduct regular audits.

Supply Chain Team

Governance

Transparency

Medium

- Disclose relevant data while protecting commercial confidentiality.
- Use third-party audits for validation.

Corporate Governance Team

Stakeholder Engagement

Medium

- Formalize engagement with stakeholders

CSR and Governance Teams

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Risk Area

Specific Issue

Risk Level

Mitigation Measures

Responsible Team

through meetings and feedback mechanisms.

5. Action Plan

1. Preparation

- Develop a human rights assessment framework.
- Identify and map affected stakeholders.

2. Assessment

- Conduct surveys, interviews, and on-site evaluations.
- Document findings and prioritize high-risk areas.

3. Implementation

- Develop mitigation measures for identified risks.
- Assign responsibilities and timelines for action plans.

4. Monitoring

- Regularly track progress on mitigation measures.
- Review and update human rights practices annually.

5. Communication

- Internally share findings with employees and management.
- Externally communicate key aspects while safeguarding confidentiality.

6. Training and Capacity Building

- Conduct regular training sessions for employees and suppliers on human rights standards.
- Provide specialized training for teams managing high-risk areas like labour practices and supply chain ethics.

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7. Governance and Accountability

- **HR Head:** Oversee the human rights management process.
- **EHS Manager:** Address overlapping environmental and human rights concerns.
- **Compliance Officer:** Ensure adherence to legal and ethical standards.

8. Documentation and Reporting

- Maintain comprehensive records of assessments, findings, and corrective actions.
- Report annually on human rights performance in the sustainability report.

9. Revision History

The plan will be reviewed annually or as needed to incorporate stakeholder feedback and align with updated regulatory and ethical standards.

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

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