

	<h2>Human Rights Policy</h2>	Doc. No. TCPL/POL/01
		Issue No: 02
		Rev. No: 00
		Date: 26.05.2023

At TCPL Packaging Limited (TCPL), employees are recognized as vital stakeholders. TCPL has always endorsed the spirit of human rights, creating and nurturing a culture where human rights are respected and upheld. TCPL strives to build a culture of mutual trust and respect.

The purpose of this policy is to create a business environment that aligns with the principles of human rights and prohibits unethical practices such as child labour, forced labour, and human trafficking. TCPL ensures freedom of association and non-discrimination. The goal is to raise employee awareness regarding these matters, accepted as policy, and the consequences of breaching this policy. We offer explicit guidelines and mechanisms to handle any instances of violation efficiently, should they arise inadvertently.

Scope and Coverage of the Policy:

This policy applies to all TCPL employees and workers, including part-time and temporary/contract workers and business partners/affiliates. The company encourages its value chain partners to adopt this policy.

The purpose of this policy is multifaceted:

1. To establish a foundation for integrating the obligation to safeguard human rights, as delineated by the UN Guiding Principles on Business and Human Rights, across all operational facets.
2. To cultivate internal expertise and managerial capability to recognize human rights vulnerabilities and enforce human rights criteria.
3. To cultivate sound and efficient internal business procedures.
4. Given the intricate nature of business operations, particularly within expansive supply chains, a human rights policy guarantees that suppliers and collaborators uphold ethical standards, thus averting human rights infringements throughout the entire value chain.

Definitions:

1. Human rights are fundamental rights inherent to all human beings, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, colour, religion, language, or any other status.
2. Business Partners: Includes suppliers, customers, vendors, dealers, distributors, or other such persons with whom the Company has any business or transactional dealings.
3. Affiliates means any person/ organization which is associated with TCPL
4. Forced Labour- According to ILO, forced or compulsory labour is 'all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.
5. Child Labour - Our definition of child labour is consistent with the ILO's (International Labor Organization) core labour standards and the United Nations Global Compact principles.

Objective of the policy:

The objectives of a human rights policy are to ensure compliance with laws and standards, protect individuals' rights across operations and supply chains, and foster a culture of respect, transparency, and continuous improvement within the organization.

Commitments to Stakeholders:

Employees: We respect all applicable human rights standards and principles. Our employment policies and procedures aim to cover these rights, principles, and related issues. We are committed

	<h2>Human Rights Policy</h2>	Doc. No. TCPL/POL/01
		Issue No: 02
		Rev. No: 00
		Date: 26.05.2023

to sensitizing our employees to be aware of and respect human rights in the workplace and the local communities directly impacted by our operations.

Business Partners: We seek to respect and promote human rights when engaging with business partners, joint ventures, and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification, and contractual provisions.

Local Communities: We recognize that we are a part of the communities in which we operate and respect their human rights. If our activities impact local communities, we seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize, and mitigate them. To support this, the Company may implement different types of support and strategies for remediation or provide access to grievance mechanisms for other groups.

APPLICABLE STANDARDS AND PRINCIPLES:

This Policy articulates the company's responsibility to respect Human Rights and demonstrates the Company's corporate responsibility to protect human rights in line with the following:

1. UN Guiding Principles on Business and Human Rights (UNGPs);
2. The United Nations (UN) Universal Declaration of Human Rights and the two International
3. Covenants making up the International Bill of Human Rights;
4. The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights and Applicable regulatory requirements

Policy:

Prohibition of Child Labour

TCPL is totally against the engagement of any child labour for its work and is committed to the following:

1. Committed not to recruit or hire workers below the age of 18 or in compliance with the local minimum age (whichever is lower). TCPL follows age verification using Birth Certificates/ Aadhaar/ SSC Certificates, etc. during recruitment
2. Commitment to not allowing young workers to work within the unit in any manner.
3. Committed: If child labour is discovered, the company will remediate the situation in the child's and their family's best interests.
4. Commitment to comply with all applicable legal and customer requirements
5. Contractor's sites shall be regularly audited/ visited by the HR team to ensure compliance and
6. Employees are encouraged to report child labour concerns in the supply chain.

Child Labour Rehabilitation

This policy applies to TCPL and extends to all individuals entering the premises for employment with the company. This policy aims to enforce an age restriction policy for employees working on the premises, ensuring that individuals aged 18 years and below are prohibited from employment, thus contributing to eradicating child labour in the industry.

The following steps must be followed if child workers are identified at a factory.

- i. The child worker must stop working immediately.



Human Rights Policy

Doc. No. TCPL/POL/01

Issue No: 02

Rev. No: 00

Date: 26.05.2023

- ii. The factory must not terminate the child worker's employment. Under no circumstances can the child's future safety and well-being be put in jeopardy.
- iii. The factory must contact the child's parents/legal guardians to arrange their safe return to their original residence. The factory is responsible for returning the child to their original residence, arranging suitable transport, and bearing the cost of transport, accommodation, and other related expenses. The factory must maintain all expense records related to the child's return. These records will be reviewed to verify that the factory has complied with the Rehabilitation Plan.
- iv. All employees will undergo age verification using official records provided by local governmental authorities.

If there is no record for age verification, the employee shall get a certificate from the approved dental surgeon.

The candidate will not be allowed to work on the premises without proper age records.

Proper verification of age records to be done by the factory HR to authenticate the records provided.

The age record should be placed in the personal file of the concerned employee for further verification.

Prohibition of Forced Labour and Human Trafficking

TCPL ensures that all employees in its facility do so voluntarily and do not engage in or support forced labour. To respect the human right to freedom and dignity, to strictly prohibit the use of forced or compulsory labour at all its units, and remain committed to refraining from any activity that may encourage or support human trafficking.

- i. The company shall not engage in or support forced or compulsory labour, nor shall personnel be required to pay 'deposits' or lodge original identification papers with the company upon employment.
- ii. Neither the Company nor any entity supplying labour to the Company shall withhold any part of any personnel's salary, benefits, property, or documents to force such personnel to continue working for the Company.
- iii. Personnel shall have the right to leave the workplace after completing the standard workday. Every person engaged by TCPL shall be free to terminate the employment provided that reasonable notice is given.
- iv. TCPL and any labor-supplying entities associated with it are strictly prohibited from engaging in or supporting human trafficking in any form.
- v. All employees are informed of the terms of their employment, i.e., job description, hours of work, overtime details, etc., and are not expected to work beyond these hours without their consent.
- vi. Employees are not required to work on any holiday or overtime without their consent.
- vii. A designated person with specific responsibility for communicating, deploying, monitoring, and maintaining the process and procedures to ensure that forced labour is not used in the TCPL.
- viii. Employees in the recruitment function are trained to ensure that violations do not take place at TCPL.
- ix. Periodic verification of the operation of processes and procedures to ensure that forced labour is not used/engaged in TCPL is carried out to monitor and ensure continued compliance.

	<h2>Human Rights Policy</h2>	Doc. No. TCPL/POL/01
		Issue No: 02
		Rev. No: 00
		Date: 26.05.2023

- x. Contractor's sites shall be regularly audited/ visited by the HR team to ensure compliance and Employees are encouraged to report any forced labour and trafficking incidents/concerns in the supply chain.

Freedom Of Association and Right to Collective Bargaining

TCPL shall recognize and respect workers' right to lawfully form and join trade unions or associations of their choosing and bargain collectively.

- i. The company shall facilitate a parallel independent mechanism to enable workers to organize and bargain collectively if the local law prohibits formal trade unions.
- ii. The company shall not subject any worker to discrimination, victimization, intimidation, penalty, or any other threat to restrict and interfere with their right to associate.
- iii. The company shall not directly or indirectly force any worker to join or not to join a particular union.
- iv. The worker shall have a free and independent choice to join or not to enter a particular union.

We at TCPL Packaging do not prevent the workers from the right to establish and join workers' committees/unions or the organization of their choice to have access to bargain and to redress any grievances collectively.

Also, employees are encouraged to report any concerns/ issues related to wages, facilities, etc, individually.

Non-Discrimination

TCPL is committed to promoting diversity and inclusion in the workplace and providing an environment free of discrimination for our employees and guests. This is reflected in the Company's making diversity one of our Core Values. TCPL strictly prohibits any form of discrimination by any of our employees. Discrimination in the workplace based upon sex, race, colour, religion, age, national origin, disability, sexual orientation, gender identity or expression, or any other protected category not only demonstrates a lack of judgement and good common sense but also violates our personnel policies and practices, our Core Value of respect and caring, and in most instances the law.

Prohibited Conduct of Supervisors:

As a supervisor with influence over the hiring process and the conditions of employment for workers and employees working under him/her, the Supervisor is strictly prohibited from engaging in any form of unlawful discrimination in hiring, promotion, terms and conditions of employment, discipline, and termination of workers and employees based on any protected category. For example, no supervisor shall make or permit acquiescence in, submission to, or rejection of discrimination to be the basis or any part of the basis for an employment decision affecting any other person except to take disciplinary actions under this policy. Permit discrimination to have the purpose or effect, from the perspective of a reasonable person, of substantially interfering with any other person's work performance or of creating an intimidating, hostile, or offensive work environment; take or fail to take a personnel action as a reprisal against any other person for rejecting or reporting any discrimination hereunder; and grant, recommend, or refuse to take any personnel action in favour of any person because of any relationship with such person.

Human Rights of Local Community / Stakeholder Engagement:

	<h2>Human Rights Policy</h2>	Doc. No. TCPL/POL/01
		Issue No: 02
		Rev. No: 00
		Date: 26.05.2023

TCPL respects the cultures, traditions, customs, and values of the people in the communities in which it operates. TCPL engages with local communities on human rights matters that are important to them, such as surface rights, access to clean water, health, and sanitation. TCPL engages with people in these communities, including vulnerable and disadvantaged groups. TCPL aims to ensure through dialogue that it listens to, learns from, and considers its views on the surrounding ecosystem as it conducts its business. Within its capabilities, the Company endeavours to promote human rights by improving the economic, environmental, and social conditions and further serve as a positive influence at places where it operates for sustainable development of the community at large.

TCPL conducts human rights impact assessments as part of SMETA Audits

Commitment to an Effective Non-Discrimination Policy:

TCPL provides working conditions where there will be no retaliation against any employee for making a good-faith complaint under this policy or for participating in any investigation conducted under this policy. In case of any retaliation by the Supervisor as a result of a good-faith complaint of a violation of this policy, the affected worker/ employee should report his/her concerns to the Department Leader to whom the Supervisor reports. The Company unequivocally condemns retaliatory conduct from its employees, particularly those in supervisory roles. Such conduct will be subject to termination of the employment of the Supervisor if it is established.

Working Hours

TCPL is dedicated to upholding the welfare of its employees and protecting their interests by and is:

- i. Committed to complying with all applicable national laws, legal provisions, and customer requirements related to working hours and OT benefits adherence.
- ii. Committed to providing weekly off to employees and workers, facilitating leaves and holidays.

Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall receive a timely and understandable wage statement with sufficient information to verify accurate compensation. All use of temporary, dispatch, and outsourced labour will be within the limits of local laws.

Humane Treatment

TCPL is committed to ensuring humane treatment and prohibiting any harsh or inhumane behaviour, which includes sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers.

Avoiding Involuntary Resettlements:

The Company seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to complying with the national government's or regional authorities' guidelines on resettlement and rehabilitation and also acting in line with international human rights norms on this

	<h2>Human Rights Policy</h2>	Doc. No. TCPL/POL/01
		Issue No: 02
		Rev. No: 00
		Date: 26.05.2023

subject, including the International Finance Corporation Performance Standards. We will also work with our business partners to promote and encourage the adoption of this principle.

Respecting Indigenous Peoples' Rights:

The Company respects the rights of Indigenous People as defined by national laws and emerging international standards. We will also work with our business partners to promote and encourage the adoption of this principle.

Governing Mechanism:

TCPL has a robust governing mechanism for implementing human rights policies and involves several key components. These include:

Policy Development: The company develops a human rights policy in line with international standards.

Leadership Commitment: Top management demonstrates a strong commitment to human rights principles.

Integration: Human rights considerations are integrated into all business processes.

Risk Assessment: TCPL conducts a thorough assessment to identify and mitigate human rights risks in its operations and supply chain.

Due Diligence: Robust processes are implemented to prevent and address human rights violations.

Training: Training programs are provided to raise awareness and build skills on human rights among employees.

Transparency: Regular reporting on human rights performance and challenges foster transparency.

Stakeholder Engagement: TCPL engages with stakeholders to address concerns and collaborate on solutions.

Accountability: Mechanisms are established to hold individuals and entities accountable for human rights violations.

Continuous Improvement: Policies and practices are continuously reviewed and updated to ensure alignment with evolving standards and best practices and based on transparent reporting on progress and challenges

Reporting Discrimination:

Suppose an employee or worker believes they have experienced or witnessed discrimination violating this policy. In that case, she/he is encouraged and expected to report such conduct to her/his supervisor or respective department leader. Additionally, if a supervisor is charged with reporting any reports of discrimination made known to employees or workers or if the supervisor witnesses these individuals, complaints will be handled confidentially to the maximum extent possible and will be investigated and resolved promptly. Where complaints have merit, appropriate disciplinary action will be taken against the offender, including termination of employment.

Grievance Redressal Mechanism

	<h2>Human Rights Policy</h2>	Doc. No. TCPL/POL/01
		Issue No: 02
		Rev. No: 00
		Date: 26.05.2023

TCPL implements the above standards by incorporating them in related policies, processes, and guidelines across all our business operations.

TCPL conducts training to strengthen in-house awareness and education on the practice of human rights. The following grievance mechanism provides all employees, workers, business partners, and other relevant stakeholders a secure system to raise grievances related to human rights violations and to report confidentially and anonymously without fear of retaliation, any breach of policies and procedures in TCPL:

- i. Whistle Blower Policy - for reporting genuine concerns or grievances about unethical behaviour and actual or suspected fraud.
- ii. POSH Policy on Prevention and Redressal of Sexual Harassment at Workplace – for reporting any instance of sexual harassment of women at the workplace.
- iii. To report other matters relating to human rights violations, the Company has a Human Resource head who acts as a point of contact for human rights issues.

Roles & Responsibility:

Top Management/Executive Leadership: Set strategic goals and allocate resources.

HR Department: Develop policies, conduct training, and ensure fair treatment of employees.

Legal and Compliance department: Ensure legal compliance and conduct risk assessments.

Procurement Policy: Assess suppliers, develop codes of conduct, and address violations.

Operations/Production: Monitor working conditions and implement grievance processes.

Sales/Marketing: Communicate the company's human rights initiatives internally and externally.

Version	Date	Policy	Ref
Issue No:01	Issue Dt: 02/01/2016 Revision Dt:01/04/2021	Child Labour , Child Labour Rehabilitation, Forced Labour and Human Trafficking, Freedom Of Association and Right To Collective Bargaining , Non-Discrimination, Working Hours, Policy for Labor Ethics, Occupational health and safety	TCPL/POL/SA/01 TCPL/POL/SA/10 TCPL/POL/SA/02 TCPL/POL/SA/04 TCPL/POL/SA/05 TCPL /POL/SA/07 TCPL/POL/SA/37
Issue No:02	Issue No : 02 Revision No: 00 Date : 26.05.2023 Consolidation of policies into a single “Human Rights Policy”	Following policies are clubbed Together: 1. Child Labour 2. Child Labour Rehabilitation 3. Forced Labour and Human Trafficking 4. Freedom Of Association and Right To Collective Bargaining 5. Non-Discrimination 6. Anti-Sexual Harassment Policy.	TCPL/POL/01

Approved By Sd/-
Saket Kanoria
Managing Director
Date - 26.05.2023