

CHILD LABOUR, FORCED LABOUR & HUMAN TRAFFICING POLICY

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1. Policy Statement

The Company maintains a zero-tolerance approach towards child labour, forced labour, bonded labour, and human trafficking across all its operations and value chain. We are committed to conducting business ethically, responsibly, and in full respect of internationally recognized human rights and labour standards.

The Company strictly prohibits the employment of individuals below the legal minimum working age and ensures that all work is voluntary, free from coercion, debt bondage, restriction of movement, or intimidation. This commitment extends to employees, contract workers, suppliers, service providers, and other business partners.

The Company is committed to respecting and protecting the rights, dignity, freedom, and well-being of all workers and ensuring that employment relationships are entered into freely and voluntarily.

2. Purpose

The purpose of this policy is to establish the Company's commitment and framework to prevent, identify, and address risks related to child labour, forced labour, and human trafficking. The policy defines expectations, governance principles, and responsibilities to ensure ethical recruitment, fair employment practices, and effective remediation where risks are identified.

3. Scope

This policy applies to all employees, including permanent, contractual, temporary, trainees, apprentices, and interns, as well as to contractors, suppliers, service providers, and other third parties associated with the Company. It covers all Company operations, facilities, projects, and supply chain activities where the Company has direct or indirect influence.

4. Applicable Laws, Regulations & Guiding Frameworks**4.1 National Laws & Regulations**

The Company complies with all applicable laws relating to child labour, forced labour, and human trafficking, including but not limited to:

- Child and Adolescent Labour (Prohibition and Regulation) Act
- Bonded Labour System (Abolition) Act
- Labour Codes and related rules

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- Applicable state-specific labour laws

4.2 International Standards & Principles

- ILO Conventions on Forced Labour and Child Labour
- UN Guiding Principles on Business and Human Rights
- UN Global Compact Principles on Human Rights and Labour

4.3 Voluntary & Industry Standards

- SA8000 – Social Accountability
- ISO 26000 – Social Responsibility
- GRI 408 & 409

5. Alignment With UN Sustainable Development Goals (SDGs)

This policy supports the following SDGs:

- **SDG 8 – Decent Work and Economic Growth**
- **SDG 10 – Reduced Inequalities**
- **SDG 16 – Peace, Justice and Strong Institutions**

6. Objectives and Targets**6.1 Qualitative Objectives**

The Company aims to:

- Eliminate all forms of child labour, forced labour, bonded labour, and human trafficking from its operations and supply chain.
- Ensure ethical, transparent, and lawful recruitment practices.
- Strengthen awareness and accountability among employees and suppliers.
- Identify and mitigate labour-related risks through due diligence and monitoring.
- Provide effective grievance and remediation mechanisms for affected individuals.

6.2 Quantitative Targets

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The Company will work towards:

- Zero tolerance for child labour, forced labour, and human trafficking.
- 100% compliance with applicable legal and regulatory requirements.
- 100% age verification during recruitment processes.
- 100% inclusion of labour-rights clauses in supplier and contractor agreements.
- Conduct periodic internal assessments or audits to identify and address risks related to child labour, forced labour, and human trafficking.
- 100% investigation and resolution of reported concerns related to child labour, forced labour, or human trafficking.
- 100% access to grievance mechanisms for employees and workers.

7. Key Commitments

7.1 Child Labour

The Company strictly prohibits the employment of children below the legal minimum working age. Young workers, where legally permitted, are not assigned to hazardous or unsafe work and are provided appropriate protections in line with applicable laws.

7.2 Forced Labour and Human Trafficking

All work must be freely chosen. The Company prohibits coercion, debt bondage, retention of identity documents, wage withholding, deposits, or any practices that restrict freedom of movement or create dependency.

7.3 Ethical Recruitment

Recruitment practices are designed to be fair, transparent, and free from exploitation. Recruitment fees, if any, are not charged to workers, and employment terms are communicated clearly and voluntarily accepted.

7.4 Worker Documentation & Freedom of Movement

The Company does not retain original identity documents, passports, or personal records of workers except where required by law and with appropriate safeguards. Workers are free to leave employment in accordance with applicable notice requirements and are not subject to restrictions on freedom of movement.

8. Human Rights Due Diligence

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The Company adopts a human rights due diligence approach to identify, assess, and mitigate risks related to child labour, forced labour, and human trafficking. This includes periodic risk assessments, supplier engagement, internal reviews, and integration of findings into management processes.

Findings from risk assessments and due diligence activities may be used to develop corrective action plans, strengthen controls, and prevent recurrence of identified risks.

9. Supply Chain Expectations

Suppliers, contractors, and service providers are expected to adhere to standards consistent with this policy. The Company may communicate these expectations through supplier codes of conduct, contractual clauses, assessments, and engagement activities, and may take appropriate action where non-compliance is identified.

Suppliers and contractors may be required to provide information, cooperate with assessments, and implement corrective actions where labour-rights risks or violations are identified.

10. Grievance Redressal & Remediation

The Company provides accessible, confidential, and fair grievance mechanisms for reporting concerns related to child labour, forced labour, or human trafficking. All complaints are handled impartially and without retaliation. Where violations are identified, the Company is committed to taking corrective action and supporting appropriate remediation in line with legal and ethical standards.

11. Training & Awareness

The Company promotes awareness of this policy and related human rights commitments through induction programs, periodic training, and communication initiatives. Training may extend to employees, supervisors, procurement teams, and relevant suppliers to strengthen understanding and compliance.

12. Roles and Responsibilities

Role	Responsibilities
Top Management	Approve the policy, provide oversight, and ensure resources for implementation.

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Human Resources (HR)	Implement ethical recruitment practices, verify age compliance, and manage grievances.
Procurement	Integrate labour standards into supplier engagement and contracts.
Sustainability / ESG Team	Monitor alignment with human rights commitments and support assessments.
Department Heads / Managers	Ensure compliance within their areas of responsibility.
Employees & Workers	Comply with the policy and report concerns in good faith.
Suppliers & Contractors	Adhere to policy requirements and applicable labour laws.

13. Monitoring, Review & Continuous Improvement

Implementation of this policy is monitored through internal reviews, risk assessments, grievance analysis, and management oversight. The policy is reviewed periodically to ensure continued relevance, legal compliance, and effectiveness, and updated as required based on changes in laws, risks, or stakeholder expectations.

Monitoring activities may include recruitment record reviews, age-verification checks, supplier assessments, grievance trends, and corrective action tracking.

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14. Document Control & Approval

This document is controlled and becomes effective only after formal preparation, review, and approval. Any revisions must follow the defined document control process. Only the latest approved version shall be used for operational purposes.

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