

Policies at KIPL

GENERAL WORK, HEALTH, SAFETY AND ENVIRONMENTAL POLICY

INTRODUCTION

COMPANY is focused on guaranteeing the health, safety and welfare of its staff, contractors and visitor within its workplace. We encourage all of our staff members to regard accident prevention and working securely as a collective and individual responsibility.

We recognize our moral and legal responsibilities under state legislation and attempts to ensure that our operations do not place either our employees or the wider community at risk of injury or illness.

OBJECTIVES

We at, **Khushboo India Pvt Ltd. Plot No. - V6**, Ship Recycling Yard, Alang, are committed to recycle the ship in safe and environment friendly manner, and to:

- Committed to Comply with Integrated Management System, Legislation, Regulations and other requirement.
- Comply with the Hong Kong International Convention for safe and environmental sound recycling of ships 2009.
- Comply with EU ship recycling regulation and other national and international legislation, regulations and other requirements.
- Committed to Comply and improve the requirements of human health, welfare, safety and the environment.
- Committed to Comply to the protection of environment through prevention of pollution by waste minimization, prevention of ill health and injury by safe practices and reduce risks and hazards by consultation and participation of workers.
- Comply with customer requirements.
- Continually improve the effectiveness of Integrated Management System to achieve satisfaction of employees, customers and stake holders in line with the strategic direction of the organization
- We commit to “No felling of sections / blocks in the intertidal zone”.
- To provide a safe and healthy work environment for all employees.
- To make every reasonable effort to prevent accidents, protect its employees from injury and promote the health, safety and welfare of all employees.
- To ensure our casual and temporary staff at the same level of health and safety protection as the host employer’s permanent staff.

Prepared By: HSE

Approved By: Management

THE WORK HEALTH, SAFETY AND ENVIRONMENTAL COMMITTEE

A Work Health and Safety committee has been shaped to cover staff in all offices of **COMPANY** as a method by which management at **COMPANY** can consult with employees on work health and safety issues.

The Committee is comprised of elected employee representatives from **COMPANY**, and a representative from **COMPANY** management. The management representative will have the necessary power to authorize actions recommended by the Committee to be carried out.

THE WORK HEALTH, SAFETY AND ENVIRONMENTAL PROGRAM

This program relates to all aspects of Work Health and Safety including:

- WHSE training and education.
- Review of work design, workplace design and standard work methods, including those associated with technological change.
- Safety rules, including penalties.
- Emergency preparedness procedures and drills.
- Provision of Personal Protective Equipment (PPE), services and facilities in accordance to current WHS legislation.
- Workplace inspections and evaluations.
- Reporting and recording of incidents, accidents, injuries and illnesses; and Provision of information to employees regarding the same and re-communicate by which it does not reoccur.
- Environmental safeguards, environmentally sound recycling of ships

ROLES AND RESPONSIBILITIES

MANAGEMENT HAS THE RESPONSIBILITY TO

- Identify hazards, assess risk and implement control strategies to minimize the risk of injury to people and property.
- Ensure the relevant Acts and Regulations that apply to work conditions and the work environment are observed and enforced.
- Encourage dialogue in addressing safety issues.
- Design, purchase, install and maintain a safe working site and machinery.
- Develop and implement safe systems of work.
- Provide adequate safety information, training and supervision.

RESPONSIBILITIES OF SUPERVISORS

Supervisors are responsible and accountable for the safety of staff, clients, contractors and company products and services under their control and have the responsibility to.

- Ensure that the workplace under their control is safe and without risks to health.
- The supervisor will always be held accountable for identifying any unsafe or unhealthy conditions or behaviour.
- Ensure that the behaviour of all persons in the workplace is safe and without risks to health.
- Attempt to remedy all problems relating to Work, health and safety.

RESPONSIBILITIES OF EMPLOYEES

All employees have the responsibility to:

- Adhere to safe work practices, instructions and rules.
- Immediately report any unsafe work condition or equipment to the supervisor.
- Not to misuse, damage, refuse to use, or interference with anything provided in the interest of Work health and safety.
- Perform all work duties in a manner which ensures individual health and safety and that of all other employees.
- Encourage fellow employees to create and maintain a safe and healthy work environment.
- Co-operate with all other employees to enable the health and safety responsibilities of all employees are accomplished.

RESPONSIBILITIES IN REGARD TO PARTICIPANTS AND VISITORS

- All health and safety rules and procedures adhere too.
- Facilities and equipment that are used or may be used by participants are in good condition and working order.
- The environment meets legal and community standards of acceptance, especially in regard to noise control, cleanliness, hygiene, smoke-free and ergonomically friendly.
- Information on relevant WHS issues is included in training courses and induction processes.
- The participants take reasonable care for the health and safety of others.
- Emergency procedures and exit routes are clearly marked throughout the workplace with evacuation procedures in place and displayed.

ROLE OF THE WORK HEALTH AND SAFETY OFFICER

THE WHS REPRESENTATIVE

Be a permanent and full-time member of staff wherever possible and undergo relevant WHS training and will, in turn, conduct training for management, staff and participants.

Be provided with access to information relating to WHS issues, actual and potential workplace hazards and the implementation of measures to make the workplace safe. Be familiar with the requirements of the relevant WHS legislation.

THE FUNCTIONS OF THE WHS REPRESENTATIVE

- To inspect all or any section of the workplace at times; and immediately in the event of an accident, hazardous situation, dangerous occurrence or immediate risk to the health and safety of any person. Accompany a Work Cover delegate on an inspection of the workplace.
- Establish a workplace WHS committee in accordance with legal requirements.
- Provide support to employees in dealing with management concerning the health and safety issues.
- Continue to review measures to ensure work place safety.
- Responsible for the effective recording system for reporting incident, accidents and hazards in the workplace.
- Ensuring all fire safety equipment is visible and conducts fire and emergency drills periodically.
- Ensure first aid kits are regularly stocked and available as required.
- Conduct training on health and safety topics with management, staff and candidates.
- Keep current with changes in relevant legislation.

HUMAN RESOURCE POLICY

For sustainable growth, employee satisfaction and organizational effectiveness, **COMPANY** considers it necessary to have a Human Resource Policy that encompasses the policies and procedures followed within the organization.

Our group will keep HR policies current and relevant. Therefore, from time to time it will be necessary to modify and amend some sections of the policies and procedures or to add new procedures.

These policies and procedures apply to all employees

HR policies can also be very effective at supporting and building the desired organizational culture. For example, recruitment and retention policies might outline the way the organization values a flexible workforce.

In actuality, policies and procedures serve a number of purposes

- They provide clear communication between the organization and its employees regarding their condition of employment.
- They form a basis for treating all employees fairly and equally.
- They are a set of guidelines for supervisors and managers.
- They establish a basis for regularly reviewing possible changes affecting employees.
- They form a context for supervisor training programs and employee orientation programs.

HIRING EMPLOYMENT / RECRUITMENT

Hiring Employment / Recruitment at **COMPANY** is based on requirements and vacancies

for each vertical. **COMPANY** strives on keeping a healthy gender balance and also a mix of national and international employees.

The following procedure is followed when hiring an employee at COMPANY.

For vacancy at **COMPANY**, it will be posted on paper/professional sites/job portal/verbal information to master/mukadum for getting a suitable person. After receiving a resume, 1st interview call will be programmed.

1st Interview: By Associates and Human Resource. Candidate asked to submit their hard copy of documents which relates to their work experience and identification.

Offer Letter – If the candidate is selected, offer letter sent to the candidate.

After Joining – Introduction to Staff

The employees are provided information and directed on how to reach out to various departments for additional support.

Human Resource

- Contracts & Letters
- Leaves
- Policies and Procedures
- Reviews and Appraisals

All employees are supposed to submit the following within two working days from the date of joining:

- Two recent photographs
- Address Proof
- Aadhar Card
- GMB training copy

Prepared By: HSE

Approved By: Management

WAGES AND SALARIES

When determining what our organization will pay for wages and salaries, it is important to understand the economic conditions of the region in which we function, the volume of potential employees and the legislative requirements in place.

When determining what to pay, the first consideration is the placement of the role organizationally which can be determined through job classification.

The second consideration is the job-relevant skills and experiences the applicant possesses which may impact their placement in the salary range upon hire.

COMPENSATION & BENEFITS

Direct benefits are optional, non-wage compensation provided to employees in addition to their normal wages or salaries.

- These types of benefits may include group insurance like (health, vision, life etc.), disability income protection, and sick leave.
- At the time of joining, workers to be enrolled for ESIC by the company.
- Provident Fund (PF) as per Govt. regulation.
- For every 20 working days, 1 paid leave will be provided by the company.
- Workers are entitled to paid holidays as mentioned in the company holiday list.
- Workers can avail 7 casual leave, in case not avail in a year period same will lapse.
- Workers will be provided incentive basis on their performance.
- When a person is sick, a maximum of 7 sick leaves will be granted in a year limited to 1 sick leave a month.
- The bonus will be paid according to the provisions of Bonus Act 1965.
- For termination of workers, will be given 1-month notice or 1-month salary to complete the job.

FREEDOM OF ASSOCIATION POLICY

Freedom of Association means allowing workers to form and join trade unions, worker associations and worker councils or committees of their own choosing.

Workers and their representatives will not be discriminated, harassed, abused or disciplined against because of union affiliation.

The purpose is to have good two-way communication between management and workers.

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer adopts an open attitude towards the activities of trade unions and their organizational activities.

Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.

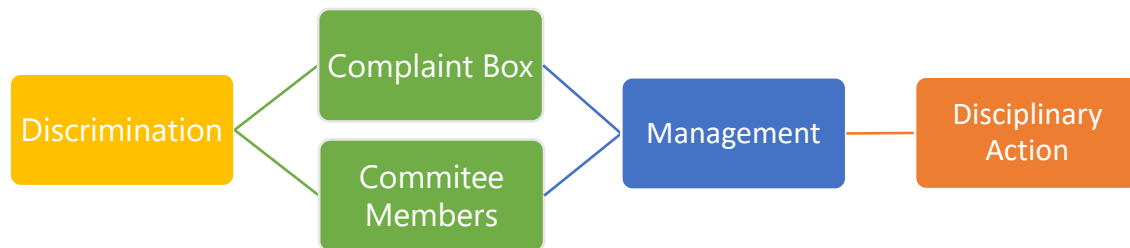
NON-DISCRIMINATION POLICY

It is the policy and commitment of Organization that it does not discriminate on the basis of race, age, color, physical or mental disability, gender, health status, marital status, sexual orientation, ethnicity, national origin, migrant status, political opinion or affiliation, religion.

Recruitment, advancement and termination are only based on worker's qualification, skills and experience.

We as organization prohibit asking workers or candidates regarding their pregnancy status, conducting pregnancy tests, or require a written statement on marital status or intent of having children.

We as organization prohibit asking employees health examinations that are not related to the nature of their employment.



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EQUAL EMPLOYMENT OPPORTUNITY

The organization is committed to a policy of equal employment opportunity and does not discriminate in the terms, conditions, or privileges of employment on account of race, age, color, sex, national origin, physical or mental disability, or religion or otherwise as may be prohibited by state law.

Any employee, board member, volunteer or client who believes that he or any other Affiliate of Organization has been discriminated is strongly encouraged to Report this concern promptly to the Management.

CHILD LABOUR AND YOUNG WORKER POLICY

“CHILD” – means a person less than 14 years of age.

“CHILD LABOUR” – means Worst Form of Child Labour as defined by ILO Convention 1999 (No. 182) and Minimum Age of Admission to Employment as defined by ILO Convention 1973 (No. 138).

“YOUNG LABOUR” – means a person between 14 years to 18 years of age.

OUR COMPANY POLICIES INCLUDE THE FOLLOWING

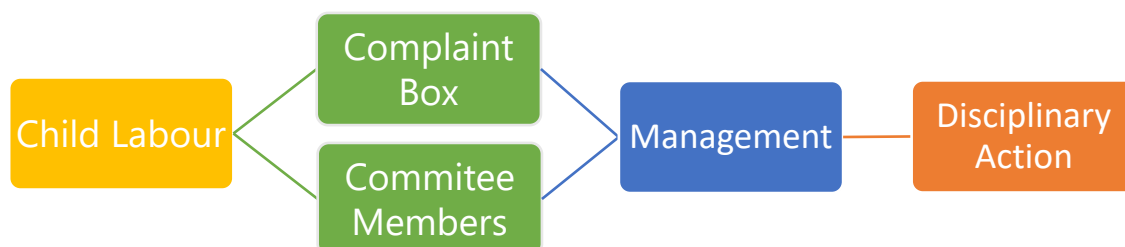
Company Commitment is not to recruit or hire workers below the age of 14 or in compliance with the local minimum age (whichever is higher).

Statement for workers below the age of 14 who have not completed compulsory schooling that their jobs will not interfere with the completion of their education.

If child labour is discovered in the company, the company will take action as per the child remediation policy.

We do not allow young workers to work overtime, at night, or in the hazardous work area. Young workers are only allowed to work in the non-hazardous work area. If any young labour is forced to work overtime/at night/hazardous work area as per disciplinary policy action will be taken.

We demand any type of identification detail in hard copy for cross-checking, issued by a government body.



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CHILD LABOUR REMEDIATION POLICY

PRINCIPLE OF NON-DISCRIMINATION

The child victim will be protected and all her/ his rights guaranteed without any discrimination based on her nationality, race, gender or any other protected characteristics.

BEST INTERESTS OF THE CHILD

Best interests of the child are the primary consideration in determining short and long -term solutions for the child.

RIGHT TO CONFIDENTIALITY

All measures should be taken to protect the privacy and identity of child victims at all stages of operation from identification to withdrawal or rescue to repatriation and rehabilitation, to ensure their safety and security and that of their families.

RAPID REINTEGRATION WITH FAMILY

The management involved in the repatriation and reintegration of the child victim will ensure that all processes are expedited and there are no unnecessary delays in implementing the reintegration plan. The child should be reintegrated as quickly as possible.

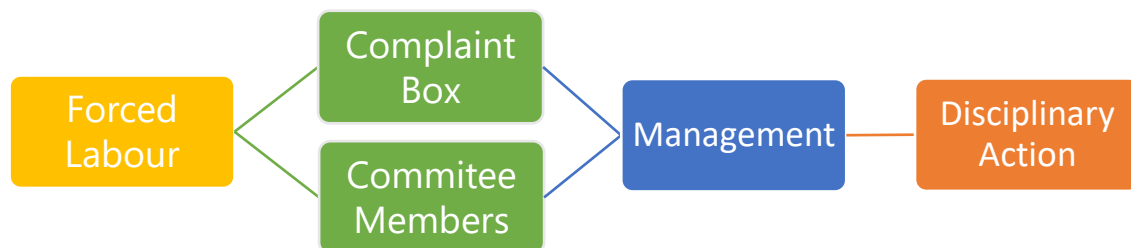
FORCED LABOUR POLICY

The company will provide employment that is freely chosen by employees, and not make use of any form of bonded, force or prison labour.

To ensure that workers have the right to terminate their employment; and to ensure that workers are not required lodging deposits, original identity documents or any other form of a bond.

OUR COMPANY COMMITS TO

- Give employees the freedom to choose their employment.
- The employees can terminate their employment anytime by giving a prior notice to the organization.
- Ensuring a fair recruitment policy is in place and that it is communicated to employees to prevent forced or bonded labour.
- Make the terms and conditions of employment available to all employees before their employment is started.
- No forced or coerced labour shall be tolerated as part of disciplinary measures.
- Not to use any form of prison labour.
- Overtime will not be forced by anyone; it will be done voluntary by the employees.



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HARASSMENT AND ABUSE POLICY

The employer is committed in all areas to providing a work environment that is free from harassment.

Harassment based upon an individual's sex, race, ethnicity, national origin, age, religion or any other legally protected characteristics will not be tolerated.

- All employees, including supervisors and other management personnel, are expected and required to abide by this policy.
- No person will be adversely affected in employment with the employer as a result of bringing complaints of unlawful harassment.
- The company will keep privacy and protection for employee's personal files and use of personal files.

RESPONSES TO ABUSE AND HARASSMENT

Any complaint of harassment or abuse should be treated seriously; it can be a serious issue for workers health and well-being.

If there is evidence of harassment and abuse, action must be taken to address it.

The action taken depends on the severity of the incidence.

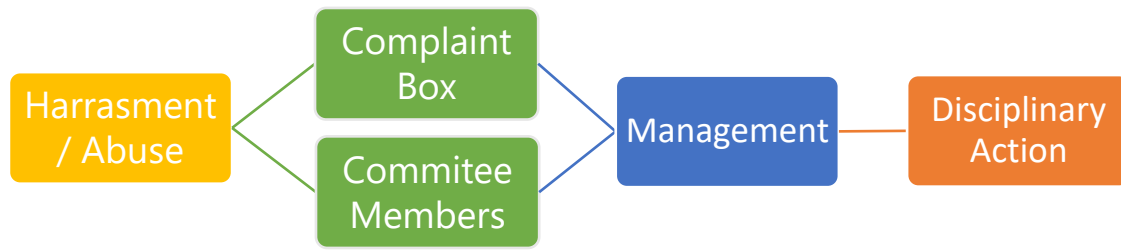
FOR EXAMPLE

In cases of sexual or other severe forms of harassment, perpetrators shall be dismissed, and local authorities should be informed if any laws were broken.

In other situations, it may be sufficient to talk with the worker who has shown abusive or harassing behaviour, warning them of future penalties.

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Approved By: Management



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

COMPANY does not pay bribes to anyone, nor takes from anyone.

Company Personnel are prohibited from giving or offering bribes, kickbacks, or similar payment or consideration of any kind, whether at home or abroad, to any person or entity.

BRIBES AND KICKBACKS

The Company does not take part in acts of corruption, or pay bribes or receive kickbacks either directly or indirectly.

The Company prohibits its partners/employees from engaging in acts of corruption, extortion and from paying bribes or kickbacks to, or accepting bribes or kickbacks from, public officials and private individuals such as the personnel of companies with which the company does business.

The company does not tolerate such practices in any form or wherever paid. It is the responsibility of all partners/employees of the companies who are involved at any time in engaging the services of external consultants, suppliers or advisers to ensure that such individuals are made aware of the content of the company's Anti-Bribery and Anti-Corruption policy and company will keep records/proof of awareness provided.

GIFTS AND HOSPITALITY

The company does not allow any exchange of gifts and hospitality that may play a role in facilitating business practice in any way. The company abides by the strict ethics policy to not offer or to receive corporate hospitality which may violate the ethical values of the business.

DISCIPLINARY ACTIONS

Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any

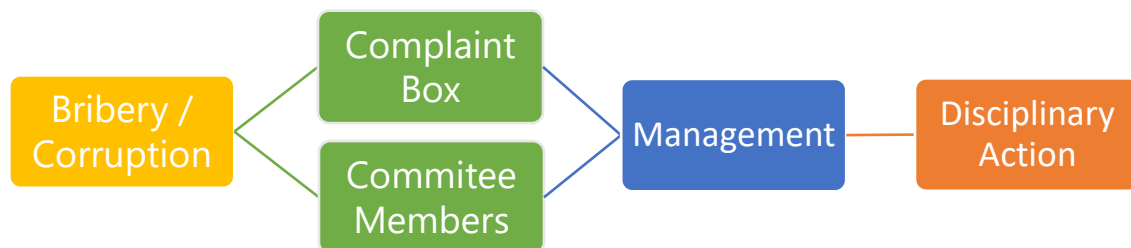
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third-party agent / vendor who violates the terms of this Policy, who knows of and fails to report to COMPANY management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

FACILITATION PAYMENTS

The company makes stringent efforts to avert any kind of bribe offered to an external body in terms of money or goods to perform an existing duty. The company fully complies with the terms and conditions of not making any kind of facilitation payments and keeps a strict check on the partners/employees who are dealing in with public officials or external bodies.



FAIR BUSINESS POLICY AND ANTI-COMPETITIVE BEHAVIOUR POLICY

The company respects the fair business policy and obliges to it by not indulging in any unfair practices to edge out competitors and maintains a healthy competition that allows and provides the competitors with equal opportunities to grow. Unfair and deceptive acts or practices are completely intolerant by the company and any employee indulging in such practices is discouraged.

The Intellectual Property of the Company should also be maintained by the employees. Intellectual property should not be transferred to anyone outside of the company. Before leaving the company, an employee should deposit any intellectual property with him.

The company very discreetly composes a decision that will create substantial economic value by analysing the situation and making sure its action will not lead to the absorption of the competitor. The company believes in maintaining a healthy environment with equal business opportunities for every company to grow at the same time respecting the intellectual property of its competitors.

PROVISIONS ON UNETHICAL CONDUCT

The company advocates ethical behaviour in all its business activities as well as exhorts the same to its employees. In case of any unethical behaviour or conduct, the company has put in place a system of reporting the unethical behaviour.

The company has also defined a whistleblower policy that entitles the employees to report or bring to notice of the management any sort of unethical conduct or violation of rules and regulations. The company ensures that there is no retaliation i.e. harassment or discrimination of any kind on the concerned for reporting violations or concerns.

FINANCIAL RECORDS AND REPORTS, NO FALSIFICATION

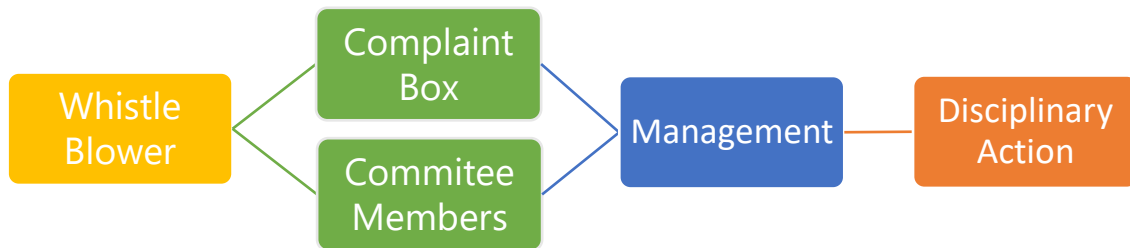
The company does not believe in falsifying any of its financial reports or records by overstating assets, sales or profits in any way. The company has never and will never present a falsified financial report that does not present a true picture to its investors and creditors. The company does not affirm in presenting misleading financial statements, any data presented has been examined in-depth.

WHISTLE BLOWER POLICY

The Whistle Blower's role is that of a reporting party with reliable information about illegal acts, violations of the code or unethical acts committed by company partners, officials, employees, workers, supplier, vendor and buyers.

To Whistle Blower – No unfair treatment will be meted out. **COMPANY**, as a policy, condemns any kind of discrimination, harassment or any other unfair employment practise being adopted against whistle blower. Complete Protection will be provided by the company management.

Whistle Blower identity shall be kept confidential to the extent possible. Any other employee assisting in the said investigation shall also be protected to the same extent as the whistleblower.



DORMITORY POLICY

We welcome you to the **COMPANY**. One of our goals is to provide a safe and clean-living environment for all permanent employees.

As a user of our facility, we would like to ask you to help us achieve this goal by observing the rules below. Please help us to make everyone's stay a safe and pleasant one.

- Upon arrival, familiarize yourself with the evacuation plan and the location of the fire extinguishers, fire alarm, first aid box, emergency light in the building.
- Do not block the exit of the building.
- No alcoholic beverage consumption or possession by anyone.
- No unlawful possession, distribution, and use of controlled substances and illicit drugs on premises.
- Do not leave the building while you have something cooking on the stovetop or in an oven.
- Clean up any spills or water on the floors, including the bathrooms and kitchen.
- No unauthorized visitors or pets are allowed in any dormitory space.

Dormitory committee will be formed with a proper election by the persons staying in the dormitory.

CLEAN ENVIRONMENT

Only occupy space on your assigned bed and storage area for their personal belongings.

Make bed daily and keep your area neat and clean.

Do not remove any mattress from any bed.

Toilets, cooking, drinking water, recreation facility will be provided by the company and it is user responsibility to keep it clean.

Prepared By: HSE

Approved By: Management

DISCIPLINARY POLICY

This policy shall be applicable to all Company employees, sub-contractors and third parties working on Company premises.

All employees are responsible for ensuring these rules are followed.

STATEMENT BY MANAGEMENT

“No matter who we are in the Company, if any of us has any doubt about the safety of an operation, or the impact we may have on people or the environment, there is an obligation to stop the job immediately to assess the hazards and control the risks. It is important to realize that not only are you fully authorized to do this – without any threat of recrimination – but it is also your clear responsibility to do so.”

RULES:

WORKING PRACTICES

- An employee shall not operate any machine, plant or equipment unless that employee has been trained and authorized to do so.
- An employee shall report to management immediately any fault, damage, defect or malfunction of any machinery, plant or equipment.
- An employee shall make full and proper use of machine guarding.
- An employee shall not clean any moving machinery, plant or equipment unless authorized to do so.
- An employee shall not leave any machinery, plant or equipment in motion unattended unless authorized to do so.
- An employee shall not make any repairs or carry out maintenance work of any description unless authorized to do so.
- An employee shall use all substances, chemicals, liquids, etc. in accordance with instructions.
- An employee shall return all substances, chemicals, liquids, etc. to their designated safe storage area when not in use.
- Employees shall observe all pedestrian and vehicle warning signs throughout the premises
- Employees shall not engage in horseplay or practical jokes which could cause an incident.

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NOTICES AND WRITTEN INSTRUCTIONS

Employees shall comply with all hazard/warning signs and notices displayed on the premises.

Employees shall read and observe any notices and instructions displayed in the work area.

WORKING CONDITIONS/ENVIRONMENT

- Employees shall make proper use of safety equipment.
- Employees shall keep work areas clear and in a clean and tidy condition.
- Employees shall dispose of all rubbish and waste materials within the working area using the facilities provided.
- Employees shall clean up any spills as soon as is possible, in a safe and environmentally responsible manner.
- Employees shall deposit waste chemicals or oils at the correct disposal points and in accordance with their supervisor's instructions.
- Employees shall not pollute water courses, sewers or drains with chemicals, oils or other hazardous substances.
- Employees shall report spills, potential threats and actual damage to the environment.

PROTECTIVE CLOTHING AND EQUIPMENT

- Employees shall use all items of protective clothing and equipment provided, as instructed.
- Employees shall not misuse or wilfully damage any item of protective clothing/equipment provided.
- Employees shall store and maintain protective clothing/equipment in accordance with their supervisor's instructions.
- Employees shall report any damage, loss, fault or unsuitability of protective clothing/equipment to their supervisor.
- Employees shall follow all site-specific personal protective equipment requirements and rules, whether on a **COMPANY** or third-party site.

FIRE PRECAUTIONS

- Employees shall comply with all emergency procedures pertinent to their work activity.

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- Employees shall ensure that any fire escape route, firefighting equipment or fire doors are kept free from obstruction.
- Employees shall report any use of firefighting equipment to their supervisor.

INCIDENTS

- Employees shall seek medical treatment for injuries they sustain, no matter how slight and ensure that appropriate records are kept. Upon returning from treatment all employees shall report the incident to their supervisor.
- Employees shall report all incidents and near misses to the employee's supervisor as soon as it is practicable.
- Employees shall notify their supervisor of any incident in which damage is caused to the company or customer property.

HEALTH

- Employees shall report to their supervisor any medical condition which could affect the safety of themselves or others.
- Employees are expected to co-operate in occupational health and medical programs.

RULES COVERING GROSS MISCONDUCT

Personnel will be subject to disciplinary proceedings up to and including dismissal if they are found to have committed any of the following actions:

- A breach of disciplinary policy.
- Unauthorized removal or interference with any guard or protective device.
- Unauthorized operation of any item of machinery, plant or equipment.
- Unauthorized removal of any item of first aid equipment.
- Wilful damage to, misuse of or interference with any safety equipment.
- Unauthorized removal or defacing of any label, sign or warning device.
- Knowingly misusing chemicals, flammable or hazardous substances or toxic materials.
- Smoking inside COMPANY Premises.
- Making false statements or in any way deliberately interfering with evidence following an incident or near miss.
- Knowingly misusing of LPG cylinder, Oxygen Tank or pressurized equipment.

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- Knowingly overloading any item of lifting equipment.
- Failure to wear Personal Protective Equipment provided when required.
- Deliberate acts of workplace violence.

Equivalent actions shall be treated as gross misconduct.

DISCIPLINARY ACTION

Depending on the circumstances, progressive corrective action for Company employees may include disciplinary action up to and including dismissal. Infractions of customer's disciplinary policy may be handled in a similar manner as infractions to Company disciplinary policy.

Contractor employees or visitors who break safety rules may be required to leave Company or a customer's property and may be terminated.

WORK HOURS AND OVERTIME POLICY

How many hours (maximum) per day, week and year can a person work?

- As per the Factories Act 1948, every adult (a person who has completed 18 years of age) cannot work for more than 48 hours in a week.
- Overtime done by employees would be paid as per the legal requirement.
- An employee can refuse to do overtime, as this is voluntary.
- According to Section 51 of the Act, the spread over should not exceed 10-1/2 hours.

STANDARD WORK SCHEDULE

- The standard work week schedule for a full-time employee subject to the state Human Resources Act is 48 per week and the normal work day schedule is six days per week, eight hours a day plus meal period.
- Workers will be given 1 holiday / rest day in a week.
- Another schedule applies to part-time employees and some shift employees. Some nature of work or position requires a workweek other than six days.

TEA AND MEAL PERIOD DEFINED

- The tea and meal period may be scheduled within the normal work hours to meet the needs of the employee and the working unit.
- A meal period is a span of 1 hour during which an employee is completely relieved of duty.
- Two-time tea period will be given for 30 minutes each.

ENVIRONMENTAL POLICY

COMPANY is committed to providing a quality service in a manner that ensures a safe and healthy workplace for our employees and minimises our potential impact on the environment. We will operate in compliance with all relevant environmental legislation

We shall use pollution prevention and environmental best practices in all our operations.

Our Policy therefore, is to:

- Integrate the consideration of environmental concerns and impacts into our decision making and activities.
- Minimize waste generation.
- Reduce, Re-use or Recycle as possible.
- Minimise energy and water use within our yard and processes to conserve supplies.
- Purchase products and services that do the least damage to the environment.
- Train, educate and inform our employees about environmental issues.
- Develop and maintain appropriate emergency and spill response programmes.

Prepared By: HSE

Approved By: Management

COMMITTEE POLICY

Khushboo India Pvt Ltd. – Plot No. V6 has devised 3 committees for remediation and functioning of the Grievance Mechanism.

Each Committee has three committee members who are elected by the workers. The committees also include the plot manager, Ethics Manager and Safety Officer. The Grievance Committee also includes one member from each committee. Additionally, two random workers are also invited during the committee meetings. The committees are as below:

Worker's Health & Safety Committee – This committee addresses the issues relating to the workers health & safety at the workplace.

Grievance Committee – This committee addresses and remediates all the Grievances of a/the worker/workers at the workplace. This includes but not limited to Discrimination, Harassment, Corruption etc.

Dormitory Committee – This committee addresses the issues a worker is facing at the

Company's Dormitory.

- Committee meetings are held at the end of every month.
- The Complaint Boxes are opened in the Grievance Committee meeting.
- All the issues are discussed with the committee members during the respective meetings and a solution is provided for the same.
- The management makes sure that the identity of the complainant is kept hidden and he

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WORKER'S HEALTH & SAFETY COMMITTEE

Freedom of Association

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- The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Collective Bargaining

Collective bargaining is a voluntary process or activity through which employers and workers discuss and negotiate their relations, in particular terms and conditions of work and the regulation of relations between employers, workers and their organizations. Participants in collective bargaining include employers themselves or their organizations, and trade unions or, in their absence, representatives freely designated by the workers. An important part of the effective recognition of the right to collective bargaining is the "principle of good faith". This is important for the maintenance of the harmonious development of labour relations. This principle implies that the social partners work together and make every effort to reach an agreement through genuine and constructive negotiations, and that both parties avoid unjustified delays in negotiations. The principle of good faith does not imply a pre-defined level of bargaining or require compulsory bargaining on the part of employers or workers and their organizations.

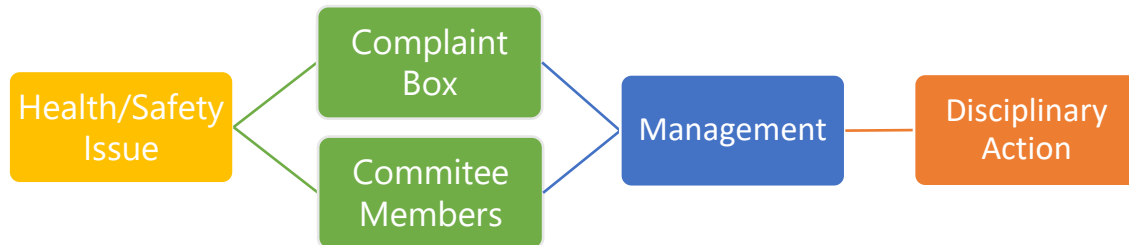
Roles of the Health & Safety Committee

- 1) To involve all persons in the workplace in health and safety concerns by responding to and discussing health and safety concerns brought up by co-workers.
- 2) To hold monthly meetings and encourage each member to contribute their own expertise
- 3) To identify health and safety hazards in the workplace and make recommendations to correct them.
- 4) To receive and investigate complaints about safety. Ensure these are referred to supervisors, reported to the committee and followed up.
- 5) To educate fellow workers about risks and safe procedures.
- 6) To orient new workers to health and safety risks and procedures.
- 7) To participate in accident investigations and regularly scheduled inspections as outlined in the rules of procedure drawn up by the committee.
- 8) To advise management on corrections for safety problems and monitor effectiveness.
- 9) To obtain information when necessary and advise on appropriate protective devices, equipment and clothing.
- 10) To advise on the establishment of appropriate health and safety programs, education and training.

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- 11) To maintain records of meetings and activities.
- 12) To attend right to refuse situations.



Benefits of Worker's Health and Safety Committee

Communication is the key to an effective health and safety system. The committee provides a link between the people doing the work and the people directing it. This brings a broad range of expertise and experience to assist with identifying hazards and finding solutions. Committees bring health and safety issues out into the open to have them resolved. The improved communication reduces accidents, benefits production and contributes to the sense of team work in the workplace.

With an effective health and safety committee:

- Accidents are reduced.
- Awareness of health and safety is improved.
- A broad base of expertise and experience is available for solving problems.
- Co-operation is encouraged through better communication.
- All workers have a way to express concerns and have them addressed.

The Internal Responsibility System

The Internal Responsibility System is the philosophical foundation of the Occupational Health and Safety Act. It is based on the principle that all persons in the workplace have a responsibility for health and safety in their environment.

When all workers are aware of hazards and can contribute to improving safety and health, there are fewer accidents.

The heart of the Internal Responsibility System is the participation of workers and employers to co-operatively identify hazards and find solutions to them. This is the role of the safety committee. The committee's duty is to note where the problems are and to make recommendations to correct them.

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Procedure for Worker's Health & Safety Committee Formation

1. Workers to be trained about their rights including the system of election.
2. After the completion of training, a notice of election schedule for workers committee to be put on notice board. This notice to also be communicated verbally.
3. The workers to be communicated for submission of nomination within a schedule time.
4. The workers to be gathered at assembly area for holding election at the stipulated time.
5. If the number of nominated candidates exceeds the number of positions available, the selection of members would be done on majority count basis after a secret ballot election.
6. In case of no nomination/lesser nomination, the selection of candidates to be done on mutual consent among the workers on the spot and approval is upon a voice vote.
7. Names of the selected candidates to be displayed on notice board.
8. This validity of the selected committee members is till all committee members are engaged with the company.

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