



**PREVENTION OF EMPLOYEMENT OF CHILD &
FORCED LABOUR POLICY**

OF

VEEDOL CORPORATION LIMITED

(formerly Tide Water Oil Company (India) Limited)
(the Company)

| Particulars | |
|----------------------------|---------------------------------|
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Revision History

| Version | Approved By | Revision Date | Description of Change | Author |
|----------------|--------------------|----------------------|------------------------------|--------------------------------|
| V1 | BoDs | 12.11.2024 | Approval and adoption | Head (HR & Admn.) and Co. Secy |

1 General Principles

As a responsible corporate citizen & law-abiding organization, the Company does not indulge into engaging child labour and forced labour and be complicit or benefit from any such unethical practices. All measures to prevent child labour and forced labour shall be implemented considering the best interests of the victim. No children below the age of 18 shall be employed in factories of the Company, and all employees/workers shall be informed about the voluntary nature of employment. The Company is having and shall continue to have sufficient management systems in place to ensure no children are employed and no adults are employed against their will. To give effect to this commitment, this Policy must be implemented by all the Company's suppliers, contractors, service providers, representatives and other persons contracting with it ("Suppliers") and they are required to comply with this Policy. Accordingly, all Suppliers must be encouraged to require their own suppliers to adhere to this Policy as well.

This Policy may be amended from time to time as circumstances require, in order to ensure that they remain effective and relevant in each of the countries in which the Illovo Group operates.

2 Policy

- 2.1. The Company & its supplier shall not make use of child labour and take appropriate measures to ensure that no child labour occurs at their own place of production or operations or at their sub-contractor's place(s) of production or operations.
- 2.2. The Company and its supplier shall obtain documentation to legally prove the date of birth for all their employees. Age of all employees will be verified through proper records provided by the local governmental bodies which shall include birth certificate, School leaving Certificate specifying date of birth, driving licence, Aadhar Card, Voter ID Card, PAN Card, Passport, Certificate issued by ESI Medical Officer, etc. If there is no available record for verification of age, the employee shall get a certificate from an approved dental surgeon. Without proper age records, any person shall not be allowed to work in the premises.
Supplier is obliged to keep the Company always informed about all places of production or operations, including their subcontractors where production or operations for the Company takes place.
- 2.3. Prior to engagement with the Company or any of its Suppliers, it is mandatory for any applicant to submit one or more of the recognized legal documents as set out in paragraph 2.2. The Company and / or its Suppliers shall undertake verification of the stated credentials by the applicant against the information provided in the documents.

The Company and / or its Suppliers may not undertake independent verification to determine the veracity of the document.

- 2.4. Prior to entering any relationship with the Company, all Suppliers will be required to execute an undertaking in prescribed format that they do not engage and will not engage any children in respect of its services provided to or on behalf of the Company.
- 2.5. While the Company and / or its Suppliers shall take best efforts to prohibit the employment of children, it shall rely on the information and documents surmised by the candidate to determine the age of such candidate. In the event of a candidate falsifying any document to appear above the prescribed minimum age the Company and / or its Supplier shall proceed to terminate the service of such candidate. The Company may initiate action against the Supplier as per the law of the land.
- 2.6. If any person employed or engaged with the Company is found to be soliciting or facilitating employment of any Child, the Company shall take strict disciplinary action against such person, which may include termination of the services of such person and reporting to appropriate law enforcement authorities.
- 2.7. The Company supplier shall not make use of any forced labour and take the appropriate measures to ensure that no forced labour occurs at their own place of production or operations or at their sub-contractor's place(s) of production or operations.
- 2.8. The Company & its supplier shall abide by the United Nations Convention on the Rights of the Child (1989) and shall comply with all relevant national and international laws, regulations, and provisions applicable in their country of production or operations.
- 2.9. Every supplier / Contractor should certify that it does not currently employ, and will not in the future employ, directly or indirectly, or through any subcontractor, any child to perform work or force any adult to work for THE COMPANY in any of its operations or activities in violation of relevant laws and regulations.
- 2.10. Each employee, supplier, contractor of the Company shall undergo training at least once in a year for understanding all form of child or forced labour to be conducted by the HR Department on a half yearly basis. Proper certificates of undertaking such training shall be provided at the end of the training and each employee shall be required to produce the Training Completion Certificate at the end of each financial year.
- 2.11. If child labour or forced labour is found in any place of production or operations, the Company will require the supplier to implement

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immediately a corrective and preventive action plan and provide a Certificate of Compliance thereof, within 7 (seven) working days of making a requisition of the same.

- 2.12. In case of forced labour, the victim shall be freed from any menace of penalty, if any and compensated for any abuse, harassment, and loss the victim has suffered due to the involuntary work conditions. The victim shall be educated about his / her worker rights and given an opportunity for working with dignity if they wish to continue working in a better environment.
- 2.13. The act of forcing a worker to take up involuntary work against their wish, under any threat or coercion is not permissible by law, and the Company will not work with suppliers or contractors who use forced labour in any of their facilities, or who do not have efficient systems in place to ensure that forced labour cannot occur on the production premises.
- 2.14. For victims of child and forced labour, the Company shall - a) support education, skill or vocational training; b) make available mental health counselling programs and c) provide supplementary health & nutrition programs and medical care. The same shall be provided through government recognized agencies.

3 Employees' Duties

- 3.1. Each employee of the Company has a duty to comply with the provisions of this Policy. If any employee of the Company has any knowledge of employment of any Child in the Company or any advertisement of solicitation of children, he / she shall immediately report this to the Company. The employee should address this complaint to the Head (HR) by way of a written communication through letter or email at head.hr@veedol.com.
- 3.2. The Head (HR) shall attend to the same within 7 (seven) working days and take remedial action in line with the provisions of this Policy.
- 3.3. Additionally, the matter alongwith the remedial actions undertaken shall be referred to the Managing Director, for his information. This process of undertaking remedial action and reporting thereof shall be followed in case the Head (HR) suo moto becomes aware of such employment.

4 Remedial Process

If it is suspected that an underage employee / worker is employed in the Company or by the Supplier, then immediate steps should be taken to

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verify the age of the individual against official documentary evidence. In the event it is observed that the employee / worker is underaged, then

1. Act quickly and appropriately by removing the employee / worker from the work area to ensure their safety
2. Record the name, age, and contact details of the employee / workers concerned.
3. Explain the legal requirements and restriction on working ages to the child clearly and carry out an age verification check.
4. Terminate the employment relationship. If employed at the place of the Supplier, then compel the Supplier to terminate the employment relationship, failing which terminate the supplier agreement.
5. Treat each situation of labour on a case by case basis to ensure the best interest of the child taking into account their specific needs and aspiration when drawing up the remediate programme in line with Point 2.14.

5 Power to Amend

The company reserves the right to amend the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at the sole discretion of the Management.

6 Complaint / Request / Grievance

The Company has a system that ensures quick response and remediation to complaints, requests, grievances or other issues. At the first instance complaint / request / grievance is to be lodged with the respective Functional Head. The Functional Head shall endeavour to address / redress the complaint / request / grievance within 15 working days of receipt of the same. In case it is found that the complaint / request / grievance is not resolved by the Functional Head within the stipulated period then the same can be directly raised with the Head of the HR function of the Company by way of a written communication either through email at head.hr@veedol.com or through a physical letter addressed to The Head (HR & Administration), Veedol Corporation Limited, 902, Godrej TWO, Vikhroli, Eastern Express Highway, Mumbai - 400 079. The Head of the HR function shall look into the complaint / request / grievance, examine and investigate the same, wherever required and provide a report thereof to the Managing Director within 15 working days of receipt of the same alongwith its recommendations towards steps to be undertaken for addressing /

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dealing / resolving the complaint / request / grievance. The Head of HR may take external help in case deemed necessary in this regard.