

**HUMAN RIGHTS AND WORKING CONDITIONS POLICY**  
**OF**  
**MALU PAPER MILLS LIMITED**

## **Human Rights and Working Conditions Policy**

Malu Paper's Human Rights and Labour Conditions Policy reflects the core requirements of the Universal Declaration of Human Rights and the company observes the ILO Declaration on Fundamental Principles and Rights at Work, including the conventions relating to forced labour, child labour, non-discrimination, freedom of association and right to collective bargaining.

Malu Paper's human rights expectations apply to all of our personnel, business partners and other parties directly linked to our operations, products or services.

Our Company's Vice-president Purchase, has overall responsibility for ensuring that human rights considerations are integral to the way in which existing operations and new opportunities are developed and managed. Compliance with, and respect for, these fundamental principles are integrated throughout our organisation.

Managers and supervisors must provide leadership that promotes human rights as an equal priority to other business issues. All employees are responsible for ensuring that their own actions do not impair the human rights of others, and are encouraged to bring forward, in confidence, any concerns they may have about human rights.

### **Labour conditions**

The Company observes the ILO Declaration on Fundamental Principles and Rights at Work which upholds basic values in four areas:

#### **1. Forced Labour**

- We will not tolerate forced labour, bonded labour or labour which involves physical or mental abuse, including actual or threatened physical punishment, verbal or sexual harassment, or domination or restraining of workers by force, authority or threats.
- Workers must not be required to lodge "deposits" or their identity papers with their employer, and they must be free to leave their employer after reasonable notice.

## **2. Child Labour**

- Exploitation of child labour is unacceptable under any circumstances.
- No person under the minimum legal working age applicable to their country may be employed by any company within the Company.

## **3. Freedom of Association and the Right to Collective Bargaining**

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- Workers' representatives must not be discriminated against and must have access to carry out their representative functions in the workplace.
- Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation or harassment.

## **4. Discrimination**

- Malu Paper ensures equal opportunity for all without discrimination or harassment on the basis of sex, race, age, color, disability, ethnic or national origin, sexual orientation, religion, social or marital status, or other status protected by applicable law.
- Malu Paper respects employee's and business partners' freedom of thought, conscience and religion. Malu Paper does not tolerate any acts of sexual harassment or other forms of discrimination or harsh treatment.
- Malu Paper encourages all employees and business partners to report and remedy harassing workplace conduct with the goal of eliminating such conduct quickly and effectively, even in cases in which the reported conduct may not be severe and pervasive so as to constitute a violation of federal law.
- Malu Paper is committed to gender equality, and believes that equal work deserves equal pay.

## **5. Working Conditions**

- Working hours, breaks, holidays and leave periods will be established in compliance with local laws and agreements, and in any case, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations.
- Workers shall be allowed at least one day off every seven days. Malu Paper shall ensure that all employees are provided with written agreements of employment and are free to leave their work after giving reasonable notice. Furthermore, compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.
- All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Imported and migrant workers are to be provided equal wages, benefits and working conditions.

## **6. Health and Safety**

- Malu Paper consistently complies with applicable environmental, safety and health (ESH) regulations as well as customer, community and other requirements.

## **7. Responsibility**

We believe that everyone in our organisation is responsible for having due regard for human rights. In particular:

- At Board level, Managing directors, have overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed;
- Managers and supervisors must provide visible leadership that promotes human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur;

- All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses.

#### **8. Contractor and Supplier Requirements**

- Beyond observing these requirements in its own operations, Malu Paper requires that its contractors, subcontractors, suppliers and their sub-suppliers adhere to the requirements of this Policy.
- Suppliers that fail to adhere to these requirements may be subject to sanctions, including, but not limited to, termination of their agreements with MALU PAPER for default.

#### **9. Verification of Compliance & Measures to Address Non Compliance**

- Compliance with this Policy at Malu Paper will be reviewed and documented by periodic internal audits.
- Malu Paper supply chain compliance efforts will focus on direct suppliers, and their employees and contractors, all of which are required to comply with applicable laws and to acknowledge and agree to Malu Paper's Code of conduct of directors and senior Management personnel, and this Policy.
- Non-compliance with this Policy or relevant laws and regulations may lead to sanctions or penalties, including, but not limited to, termination.

#### **10. Relationship to Malu Paper's Code of conduct**

- This Policy is intended to supplement and strengthen Malu Paper's commitment to human rights under its existing **Code of conduct** with this Policy.
- Every employee who has a concern relating to any issue or suspicion of any non-compliance, malpractice or any other illegitimate arrangement must report the issue to the helpline available at [www.malupaper.com](http://www.malupaper.com).

The Policy is reviewed by the Board and adopted at the meeting held on 12<sup>th</sup> February 2019.

**PUNAMCHAND MALU**

**MANAGING DIRECTOR & CEO**