

## FORCED LABOUR POLICY



- **Scope:** We, at Transrail Lighting Limited, are committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company strictly prohibits the deployment of forced labour and human trafficking in all company operations across the group. The company strictly believes in “**NO FORCED/BONDED LABOUR**”.
- **Applicability:** This policy is applicable to the entire organization, our partners, our vendors, suppliers, contractors, or anybody we do business with.
- **Abbreviations:**
  - CHRO - Corporate Human Resource Officer
  - HR - Human Resource
  - P&A - Personnel and Administration
  - TLL - Transrail Lighting Limited

❖ **Policy Statement:** In the conduct of its business, Transrail Lighting Limited:

1. The Company ensures that employees working in our establishment/factory/project site are doing so voluntarily and do not engage in or support the use of forced labour.
2. The Company do not engage in or support the use of Forced/Bonded Labour in any of our manufacturing activities/Establishment/Project Site activities whether in existence or to be opened in future.
3. All the Administrative Heads of any Facility of the Company shall promote advice and shall ask its subcontractor/vendors to discourage the engagement of Forced / Bonded Labour being a clear case of violation of law of land.

|               |                                            |               |             |
|---------------|--------------------------------------------|---------------|-------------|
| Document No : | TRANSRAIL/P/SOCIAL-FORCED LABOUR POLICY/29 |               |             |
| Prepared By : | P & A Department                           | Revision No : | 00          |
| Reviewed By : | CHRO                                       | Date :        | 01.04.2024  |
| Approved By : | MD & CEO                                   | Page No :     | Page 1 of 5 |

## FORCED LABOUR POLICY



4. Personnel shall have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment if they give reasonable notice to their employer. This complies with the Indian Bonded Labour System (Abolition) Act, 1976 and the Contract Labour (Regulation and Abolition) Act, 1970.
5. The company and any labour-supplying entity associated with the company are prohibited from retaining any portion of an individual's salary, benefits, property, or documents as a means of compelling said individual to remain employed with the company.
6. The company and any labour-supplying entity associated with it are prohibited from participating in or endorsing the trafficking of human beings.
7. All employees shall be informed of the terms of their employment i.e. job description, wages, working hours, etc.
8. The Company does not engage or support vendors and suppliers who resort to using forced labour in their operations.
9. The Company shall not keep permanently any original documents like educational certificates, Identity documents, Date of Birth Certificates, Domicile documents etc. of any employee but will only ask for deposition of such documents only for verification purposes.

|               |                                            |               |             |
|---------------|--------------------------------------------|---------------|-------------|
| Document No : | TRANSRAIL/P/SOCIAL-FORCED LABOUR POLICY/29 |               |             |
| Prepared By : | P & A Department                           | Revision No : | 00          |
| Reviewed By : | CHRO                                       | Date :        | 01.04.2024  |
| Approved By : | MD & CEO                                   | Page No :     | Page 2 of 5 |

## FORCED LABOUR POLICY



- **Forced/Bonded Labour Prevention Framework and Compliance:** Prompt reporting of any potential violation of this guideline is mandatory and should be directed to the Company's Human Resources/Personnel & Administration Department. Employees who report potential misconduct or assist in any inquiry or investigation of potential misconduct will be safeguarded against retaliation.
1. If confronted with such an incident for violation of this Policy, it must be immediately rejected and reported to the Company's Ethics Committee of the respective business comprising of the following incumbents:
    - Managing Director;
    - Head — Group Corporate Human Resources (CHRO);
    - Unit Head or Site Head/Functional Head as the case may be;
    - Group Chief Finance Officer
  2. The Company Secretary shall be the "Company Ethics Officer" and any three members of the above List along with the Company Secretary shall form a quorum of the Ethics Committee. Similarly, if any employee or agent knows or believes that an improper gratification has been or shall be made, the employee or agent must also report such incident to the Ethics Committee. The Company's policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of forced/bonded labour laws or this Policy.
  3. The Company shall offer multiple mandatory training courses through various forums and workshops to its suppliers and employees responsible in accordance with the applicable laws. The Company's suppliers shall also be required to assess their businesses and supply chain to ensure compliance with the provisions of the

|               |                                            |               |             |
|---------------|--------------------------------------------|---------------|-------------|
| Document No : | TRANSRAIL/P/SOCIAL-FORCED LABOUR POLICY/29 |               |             |
| Prepared By : | P & A Department                           | Revision No : | 00          |
| Reviewed By : | CHRO                                       | Date :        | 01.04.2024  |
| Approved By : | MD & CEO                                   | Page No :     | Page 3 of 5 |

## FORCED LABOUR POLICY



Forced/Bonded Labour Act and other requirements as incorporated under this Statement.

4. Any employee (whether full-time, part-time, or appointed on an ad hoc/temporary/contract basis), vendors, suppliers, contractors, consultants, service providers, or any other agency representative engaged in business with the Company must promptly report any instance of forced or bonded labour to a member of the Ethics Committee as soon as they become aware of such incidents.
5. The reporting of such incidents normally should be in writing. In case the reporter is not willing to furnish a written statement of fraud but is in a position to give sequential and specific transactions, then the Member of the Ethics Committee receiving the information shall record such details in writing as narrated by the reporter and also maintain the details about the identity of the official/employee/other person reporting such incident.
6. Reports can be made in confidence and the person to whom the incident has been reported must maintain confidentiality concerning the reporter and such matter should under no circumstances be discussed with any unauthorized person.
7. Member of the Ethics Committee receiving input of any such incident, nodal officer(s) shall ensure that all relevant records/documents/evidence are immediately taken into custody and protected from being tampered with, destroyed or removed by suspected perpetrators of forced labour or by any other official under his/her influence.
8. The Ethics Committee conducts preliminary verification of any suspected activity and conducts an appropriate investigation. Such an investigation can be vested to any other person or committee as the Ethics Committee deems fit.

|               |                                            |               |             |
|---------------|--------------------------------------------|---------------|-------------|
| Document No : | TRANSRAIL/P/SOCIAL-FORCED LABOUR POLICY/29 |               |             |
| Prepared By : | P & A Department                           | Revision No : | 00          |
| Reviewed By : | CHRO                                       | Date :        | 01.04.2024  |
| Approved By : | MD & CEO                                   | Page No :     | Page 4 of 5 |

## FORCED LABOUR POLICY



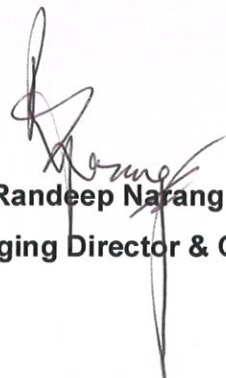
9. Post-completion of the investigation necessary and appropriate action will be taken, which could include administrative/disciplinary/civil/criminal action or closure of the matter if it is proved that forced/bonded labour is not engaged etc.

➤ **Compliance:** Breach of this Policy will not be tolerated and will be liable to be subjected to disciplinary action, which may extend up to suspension and dismissal from service.

➤ **Power to Amend:**

- Any change to the guidelines shall be approved by the Head – Group Corporate HR.
- The Management shall have the overriding right to withdraw and/or amend the guideline at its discretion as it deems fit from time to time. The decision of the management shall be final and binding.

**Date: 01.04.2024**

  
**Randeep Narang**  
**Managing Director & CEO**

|               |                                            |               |             |
|---------------|--------------------------------------------|---------------|-------------|
| Document No : | TRANSRAIL/P/SOCIAL-FORCED LABOUR POLICY/29 |               |             |
| Prepared By : | P & A Department                           | Revision No : | 00          |
| Reviewed By : | CHRO                                       | Date :        | 01.04.2024  |
| Approved By : | MD & CEO                                   | Page No :     | Page 5 of 5 |