

VIOLATION AGAINST CHILDREN POLICY



- **Scope:** Transrail Lighting Limited is committed to creating and maintaining an environment in which is free from violations of any form against children and have no place and where they will not be tolerated by any employee, sub-contractors, supplier, associate or representative of TLL.

TLL Shall ensure that all those engaged in the project are aware of this commitment.

- **Applicability:** This policy is applicable to the entire organization, our partners, our vendors, suppliers, contractors or anybody we do business with.

- **Definition:**

- 1) **Violence Against Children (VAC):** Is defined as physical, sexual, emotional and/or psychological harm, neglect or negligent treatment of minor children (i.e. under the age of 18), including exposure to such harm, that results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This includes using children for profit, labor¹¹, sexual gratification or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
- 2) **Grooming:** Are behaviours that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child and then seek to sexualize that relationship.
- 3) **Accountability Measures:** Are the measures put in place to ensure the confidentiality of survivors and to hold Company, consultants, and the client responsible for instituting a fair system of addressing cases of VAC.

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- 4) **Child:** Is used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.
- 5) **Child Protection (CP):** Is an activity or initiative designed to protect children from any form of harm, particularly arising from VAC.
- 6) **VAC Allegation Procedure:** Prescribed procedure shall be followed when reporting incidents of or VAC.
- 7) **VAC Codes of Conduct:** The Codes of Conduct adopted for the project/Company covering the commitment of Transrail, and the responsibilities of managers and individuals with regards to VAC.
- 8) **VAC Compliance Team (VCT):** A team established by the project to address and VAC issues.
- 9) **Survivor/Survivors:** The person(s) adversely affected by VAC. Children can be survivors of VAC.

- **Abbreviations:**

- CP - Child Protection
- VAC - Violations Against Children
- VCT - Violations Against Children Compliance Team
- SOP - Standard Operating Procedure
- TLL - Transrail Lighting Limited

- **Respect Each Other:** We believe in an equal opportunity at the workplace which is free from discrimination and Harassment. We are an equal opportunity employer and employment decisions are based on merit and business needs. We do not discriminate our employees based on any biases with reference to Colour, Caste, Gender, Creed, Religion, Disability, Age and Sexual Orientation. To put these values

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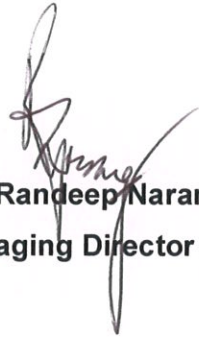


in practice, all the employees must ensure that decisions affecting employees are based on business factors only. All managers or concerned decision making authorities must ensure that decisions regarding hiring, promotion, termination, transfer, leave of absence or compensation shall only be based on relevant business factors. In case of any grievances with reference to the discrimination at the workplace or Sexual Harassment at the workplace, the employees can contact the grievance redressed forum. Confidentiality in terms of the victim's identity shall be maintained to prevent any incident of retaliation.

❖ Policy Statement:

1. The Transrail is committed to creating and maintaining an environment in which violence against children (VAC) have no place, and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the Transrail.
2. TLL shall ensure that all those engaged in the project are aware of this commitment.
3. Acts of VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and referral to the Police for further action.
4. All forms of VAC, including grooming are unacceptable, regardless of whether they take place on the work site/Plant, the work site surroundings, at worker's camps.

Date: 01.04.2024


Randeep Narang
Managing Director & CEO

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Mechanism for Preventing VAC

- Managers at all levels shall have a responsibility to uphold Transrail 's commitment to implementing and addressing VAC. This means that managers shall have an acute responsibility to create and maintain an environment that respects these standards and prevents VAC. Managers need to support and promote the implementation of the Transrail Code of Conduct. This commits them to supporting the implementation of the Plan and developing systems that facilitate the implementation of the VAC Action Plan. They need to maintain a safe workplace, as well as a VAC-free environment at the workplace and in the community.
- This declaration is required from all the stakeholders of Transrail in the form of employees, trainees, suppliers, associates, representatives, contract labourers, subcontractors etc.

I, _____, acknowledge that preventing violence against children (VAC) are important.

- The Transrail considers that failure to follow ESHS and OHS standards or to partake in or VAC activities be it on the work site, surroundings, at workers' camps or the surrounding communities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or potential termination of employment Prosecution by the Police of those who commit or VAC shall be pursued.

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- **I shall agree that while working on the project/Plant, I shall:**

1. Attend and actively partake in training courses related to HIV/AIDS and VAC.
2. Police Verification by the respective police station.
3. Treat all women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinions, national, ethnic or social origin, property, disability or birth.
4. Not use language or behaviour towards women, children, or men that are inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
5. Not engage in sexual harassment, for instance, making unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour.
6. (e.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).
7. Not engage in sexual favours, for instance, making promises or favourable treatment dependent on sexual acts or other forms of humiliating, degrading or exploitative behaviour.
8. Not participate in sexual contact or activity with children including grooming or contact through digital media. Mistaken regarding the age of a child shall not be a defence.
9. Consider reporting through the GRM or to the manager any suspicion or actual or VAC by a fellow worker, whether employed by Transrail or not, or any breaches of this Code of Conduct

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Transrail Lighting Limited shall not engage, directly or indirectly, a person below the age of 18 (Eighteen) Years.

➤ **Steps shall be taken while using children images for work-related procedure:**

1. Shall ensure before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
2. Before photographing or filming a child, shall obtain consent from child and inform the child and a parent or guardian of the child.
3. Shall ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed.
4. Shall ensure images are honest representations of the context and the facts.
5. Shall ensure file labels do not reveal identifying information about a child when sending images electronically.

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