

**CHILD LABOR, FORCED LABOR & HUMAN RIGHTSPOLICY**

We, 'SpotonCoatings Private limited', India's largest release paper and release film manufacture Indian organization; aims to become a global supplier for our product in the global emerging market. We have enhanced our pillars of competitiveness, ethics, sustainability, QHSE Compliance, while also improving economic and social conditions of the organization.

In line with our commitment, we have developed a child labor, forced labor & human trafficking policy, which is an extension of our values and is applicable to applicable interested parties as employees and legal bodies.

The objective and purpose are to suppress the use of child labor, forced labor & human trafficking in all its forms irrespective of the nature of the work or the sector of activity in which may be performed at SPOTON.

We are committed to;

- Prohibit the use of forced labor, bonded labor, prison labor and child labor.
- Ensuring that all of our employees work voluntarily for us and are not intimidated or threatened to enforce employment. Also, they retain their rights and privileges.
- Not employ any person under the age of 18 in any circumstances
- Holding the concise records for employees and an appraisal system ensures that the employee is fairly treated and has 'a voice' to represent them and to notify of any contravention with the directives of this policy. Receipt and review of two forms of official documented evidence of date of birth (i.e. Aadhar Card, Passport, Birth Certificate, Pan Card, or Driving License) is a pre-requisite for young workers / Juveniles.
- Not tolerate the use of unlawful child labor or forced labor in the manufacture of products it sells and will not accept products or services.
- Follow the applicable legal requirements, those considered and not limited to Employment & Labor Laws and Regulations India 2024.
- Make employees aware about their rights by effective communication like – display of their rights – Induction training and tool box talk etc.
- Protection of employees, contractual persons working in premises from foreseeable work hazards by effective training, provision of resources like PPE, effective work place monitoring and implementation of emergency preparedness and response plan.
- Equip employees with the awareness, information, instructions, and supervision skills needed for safe working, quality of operation and environmental management.
- Control the discrimination or harassment based on race, color, religion, national origin, citizenship, ancestry, gender identity, age, disability, marital status, sexual orientation, or other protected characteristic or status.
- Take the objectives for reduction in unsafe act, unsafe conditions, incident and near miss in the working facility by having effective management system. Objectives are defined for the same and periodically monitored.

Top management, all HODs and HR process will be responsible for effective compliance of the policy. The policy will be reviewed periodically by them as per defined QHSE system, also revised if required. Our website shall refer for latest updated policy.

Various policies including Supplier Code of Conduct, Employee code of conduct is available in our website for review. External interested parties can contact us directly if found any breach against our policies and also, they can provide their feedback for further improvement at info@spotoncoating.com

Vimal R. Patel

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