

Chromewell Engineering Private Limited

Policy On Labour and Human Rights

POLICY NO: CW-CL-008 | VERSION: 4.0 (JAN 2026)

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Table of contents

Table of contents.....	2
1. Document Information:.....	2
2. Purpose.....	3
3. Scope.....	3
4. Key Objectives and Targets.....	3
5. Governance and Allocation of Responsibilities	4
6. Policy Commitments.....	6
6.1 Prohibition of Child Labour.....	6
6.2 Prohibition of Forced Labour and Bonded Labour.....	6
6.3 Protection from Harassment, Discrimination and Violence.....	6
6.4 Migrant Worker Protections	6
6.5 Supply Chain Due Diligence	7
6.6 Reporting, Grievance, and Remediation.....	7
6.7 Health and Safety.....	7
6.8 Fair Working Conditions	7
6.9 Non-Discriminatory Compensation Practices.....	7
6.10 Career Progression and Training.....	7
6.11 Freedom of Association & Good Faith Collective Bargaining.....	7
7. KPI Monitoring and Reporting	9
8. Policy Review Mechanism	9
9. Compliance, Non-Conformance, and Disciplinary Action	10
10. Related Documents and References	10
11. Formal Approval and Sign-Off	10

1. Document Information:

Document Details		Governance
Policy Owner: HR HOD	Scope: All Chromewell Engineering employees, contractors, and the direct supply chain. All sites, all operations, all forms of work engagement. Includes migrant workers and agency-supplied labour.	Reviewed & Approved By: CEO & CFO
Secondary Owner: Compliance Executive	Applies To: All hiring, employment, contracting, and supply chain engagement activities.	Review Cycle: Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd has a zero-tolerance position on child labour, forced labour, bonded labour, and human trafficking in all forms - in our own operations and throughout our supply chain. This policy establishes Chromewell's commitment, controls, and due diligence processes to prevent, detect, and remediate any such practices.

Migrant workers in sponsor-dependent arrangements may face forced labour conditions and suppliers operating in lower-cost regions or mineral processing may engage child labour. Chromewell takes its responsibility to address these risks seriously, applying proactive due diligence at every stage of employment and procurement. Where violations are identified, Chromewell is committed to providing appropriate remediation to affected workers including access to remedy mechanisms.

This policy is aligned with:

- ILO Convention C138 - Minimum Age for Employment
- ILO Convention C182 - Worst Forms of Child Labour
- ILO Conventions C29 and C105 - Forced Labour and Abolition of Forced Labour
- UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol)
- UK Modern Slavery Act 2015 (applicable to Chromewell's UK and EU export markets)
- Indian Child Labour (Prohibition & Regulation) Act 1986 and Amendment Act 2016
- GRI 408: Child Labour (2016) and GRI 409: Forced or Compulsory Labour (2016)
- SA8000 Social Accountability Standard - Sections 1 and 2

3. Scope

This policy applies to:

- All direct employment at Chromewell Engineering - permanent, contract, temporary, seasonal, and apprentice
- All migrant workers engaged at Chromewell sites, regardless of the Indian state or origin
- All labour agencies and recruitment intermediaries used by Chromewell
- All direct suppliers, sub-contractors, and material providers in Chromewell's supply chain, through the Supplier Code of Conduct

4. Key Objectives and Targets

Chromewell Engineering defined both key objectives and targets for all child and forced labour related sustainability issues from its own operations and from its supply chain.

Sustainability Issue	Key Objective	Targets
Child Labour Prevention - Own Operations	Ensure zero instances of child labour across all Chromewell sites through rigorous pre-employment age verification, full compliance with the Indian Child Labour Act, and appropriate protection of young workers	Zero child labour incidents at any Chromewell site (maintained) 100% age verification completed for all new hires before first day of work

	who have reached the legal minimum age.	100% of young workers (aged 18+) restricted from hazardous processes per Indian Factories Act
Forced Labour & Bonded Labour Prevention	Ensure all work at Chromewell is freely chosen and freely ended. No worker shall be required to pay recruitment fees, surrender identity documents, or work under threat, coercion, or penalty.	<p>Zero forced labour or bonded labour incidents</p> <p>100% of employment contracts provided in writing in employee's native language before work commences</p> <p>Zero document confiscation</p> <p>Zero recruitment fees charged to workers - 100% of placement costs paid by Chromewell</p> <p>100% of migrant workers informed of their rights in their native language on arrival at site</p>
Supply Chain Due Diligence	Identify, assess, and manage child and forced labour risk in the direct supply chain through structured risk mapping, supplier questionnaires, and on-site social audit.	<p>100% of high-risk suppliers assessed for child and forced labour risk annually</p> <p>100% of Tier 1 suppliers sign Chromewell Supplier Code of Conduct by December 2026</p> <p>100% of high-risk Tier 1 suppliers covered supplier ESG Assessment survey/audit by December 2026</p>
Remediation	Where child or forced labour is identified - in own operations or supply chain - provide prompt, effective, and victim-centred remediation addressing the immediate situation and long-term consequences for the individual.	<p>Remediation plan activated within 48 hours of any confirmed incident</p> <p>100% of remediation outcomes reported to ESG Steering Committee</p> <p>Child workers: access to education supported; no immediate dismissal without an alternative provision being in place</p>
Awareness Training	Ensure all HR, procurement, and management staff can identify indicators of child labour, forced labour, and human trafficking and know how to report them.	<p>100% of HR, procurement, and management staff complete awareness training annually</p> <p>100% of new employees briefed on this policy and reporting mechanisms during induction</p> <p>Training record to be maintained and available for audit purposes.</p>

5. Governance and Allocation of Responsibilities

Clear accountability is assigned at every level of Chromewell Engineering's ESG Governance Structure. The table uses a RACI framework (Accountable, Responsible, Consulted, Informed).

Role / Designation	RACI Level	Department	Key Responsibilities Under This Policy
CEO & CFO	Accountable (A)	Executive	Final approval and signature. Sets the non-negotiable, zero-tolerance commitment on child and forced labour. Receives annual due diligence report and any incident notifications.
HR HOD	Primary Owner (R)	Human Resources	Owns recruitment age verification, employment contract controls, document retention procedures, freedom-of-movement protections, and migrant worker safeguards across all HR processes.
Compliance Executive	Secondary Owner (R)	Compliance	Owns supply chain due diligence for child and forced labour. Manages legal compliance with the Indian Child Labour Act and applicable international conventions. Manages and investigates whistleblower reports relating to this policy.
ESG Executive	Consulted (C)	ESG/Sustainability	Monitors KPI performance, reviews incident reports, oversees remediation outcomes, and prepares annual due diligence report for CEO & CFO
Purchase Manager	Consulted (C)	Procurement & Supply Chain	Ensures the Supplier Code of Conduct incorporates child and forced labour prohibitions. Monitors supplier compliance. Includes audit rights in all supplier contracts.
Operations Manager	Consulted (C)	Operations & Production	Ensures shop floor and warehouse operations comply with minimum age requirements and the specific working conditions applicable to young workers of legal age.
All Employees & Managers	Informed (I)	All Functions	Informed of Chromewell's zero-tolerance position. Required to immediately report any suspected violation of this policy through the grievance mechanism or whistleblower channel.

RACI: A = Accountable (signs off, one person only) · R = Responsible (does the work) · C = Consulted (input required) · I = Informed (kept in loop).

6. Policy Commitments

6.1 Prohibition of Child Labour

- Chromewell Engineering will not employ any person under the age of 18 in any capacity under any circumstances
- Age verification is conducted for every new hire through review of an original government-issued identity document such as Aadhaar Card, PAN card or passport copies before commencement of first day of work; copies are retained on file. The age of all on-roll employees is reviewed quarterly and documented in the Labour Policy Dashboard
- Young workers aged 18 and above are not assigned to hazardous processes as defined under the Indian Factories Act 1948 without a specific risk assessment and appropriate protective controls in place
- All labour agencies and recruitment intermediaries used by Chromewell are contractually required to apply minimum age requirements and are subject to Chromewell audit rights

6.2 Prohibition of Forced Labour and Bonded Labour

- All work at Chromewell is freely chosen - no employee works under threat, force, intimidation, or penalty of any kind
- Written employment contracts are provided in the employee's native language before work commences, setting out terms and conditions clearly
- No employee is required to lodge deposits, pay recruitment or placement fees, or surrender original identity documents - documents held in safekeeping are done so voluntarily and returned immediately on demand
- All employees have the unconditional right to terminate their employment with lawful notice and without penalty
- Overtime is always voluntary

6.3 Protection from Harassment, Discrimination & Violence

- Chromewell Engineering is committed to maintaining a workplace free from harassment, discrimination, bullying, and violence.
- Discrimination based on race, caste, religion, nationality, gender, age, disability, sexual orientation, or any other protected characteristic is strictly prohibited.
- All employees are expected to treat one another with dignity, fairness, and respect and contribute to an inclusive work environment.
- Employees who report concerns in good faith will be protected from retaliation, and all complaints will be investigated promptly and confidentially.

6.4 Migrant Worker Protections

Migrant workers are among the most vulnerable groups in the automotive manufacturing supply chain. Chromewell commits to:

- Providing all migrant workers with their employment contract and a summary of their key rights in their native language before travel to site and again on arrival
- Paying 100% of recruitment and placement costs - no fees are charged to migrant workers directly or indirectly
- Ensuring that migrant workers retain their freedom of movement, the right to change employer, and unrestricted access to communication with family
- Incorporating migrant worker protection requirements in the Supplier Code of Conduct for suppliers operating in regions with elevated forced labour risk.

6.5 Supply Chain Due Diligence

- Chromewell conducts an annual child and forced labour risk assessment of its direct supply chain, mapping risk by country, sector, commodity type, and supplier profile
- All Tier 1 suppliers are required to sign Chromewell's Supplier Code of Conduct, which explicitly prohibits child labour, forced labour, bonded labour, and human trafficking
- High-risk suppliers are subject to an ESG Supplier Assessment or equivalent third-party social audit on a defined cycle
- New supplier onboarding includes a child and forced labour risk questionnaire

6.6 Reporting, Grievance, and Remediation

- Any employee, contractor, or supplier who suspects child labour, forced labour, or human trafficking is required to report it immediately - reports can be made through the grievance mechanism or whistleblower channel, including anonymously
- All reports are investigated independently of line management by the Head of Legal
- Where child labour is confirmed, the child is not immediately dismissed - Chromewell supports access to education and, where appropriate, provides support to the child's family
- Where forced labour is confirmed, the worker's freedom is immediately restored, all wages owed are paid in full, and the worker is supported to access appropriate services
- All remediation outcomes are reported to the ESG Steering Committee within 30 days of the incident being confirmed
- A "Report a Concern" form is available on ChromeNet as an anonymous grievance redressal mechanism. A dedicated hotline number is also published on the company website to enable anonymous reporting of any concern.

6.7 Health and Safety

We maintain safe and healthy workplaces that meet or exceed the relevant national or international standards for occupational safety and health. We review our standards on a regular basis and are committed to continuous improvement in this area through a process of comprehensive facility audits and inspections.

Awareness and Training

- We identify evaluate and control safety hazards for all working equipment
- We display safety awareness posters, slogans at strategic locations.
- We furnish necessary information and create safety training programs
- We mandate use of protective safety accessories during welding.
- We display Flowcharts/Work instructions for handling of fire.
- Create a culture that promotes employee wellness and raises health and safety awareness.
- We create awareness on Emergency Response Plans and Training and mock drills for handling emergencies.
- We maintain a Management System to support continuous performance improvement on safety related issues.

Infrastructure

- Mandatory use of personal protective equipment
- Provide adequate fire protecting devices and provide relevant fire protection training.
- Provide emergency exits in case of fire and other such calamities.
- Provide safety guards, railing, barricades on/around presses and machines with critical operation.
- Identify and barricade space for storage of used and unused gas cylinder.

6.8 Fair Working Conditions

- Chromewell Engineering is committed to providing a safe, healthy, and respectful workplace for all employees.
- Working hours, rest periods, overtime, leave, and holidays shall comply with applicable labour laws and industry standards.

- Employees shall be provided with appropriate facilities and working conditions that support their health, safety, and well-being.
- Chromewell continuously monitors and improves workplace conditions through regular inspections, audits, and employee feedback.

6.9 Non- Discriminatory Compensation Practices

- Chromewell provides fair and competitive compensation and benefits in accordance with applicable laws and market practices.
- Compensation decisions are based on objective factors such as skills, qualifications, experience, performance, and responsibilities.
- Equal remuneration shall be provided for equal work without discrimination based on gender or any other protected characteristic.
- All wage, benefit, and incentive practices shall be transparent, lawful, and consistently applied.

6.10 Career Progression and Training

- Chromewell is committed to supporting employee growth through regular training, learning, and development opportunities.
- Training needs shall be identified through performance discussions and business requirements.
- Performance evaluations shall be conducted periodically to provide feedback and support professional development.
- Career advancement, promotions, and role enhancements shall be based on merit, performance, competencies, and business needs.

6.11 Freedom of Association & Good Faith Collective Bargaining:

- Chromewell respects employees' right to freely associate, join, or refrain from joining worker organizations in accordance with applicable laws.
- Employees may communicate concerns and workplace matters without fear of retaliation or discrimination.
- Chromewell will engage constructively with legally recognized employee representatives and worker groups.
- Collective bargaining activities, where applicable, shall be conducted in good faith, with mutual respect and compliance with local legal requirements.

7 KPI Monitoring and Reporting

The following KPIs are tracked by the ESG Working Group, reported quarterly to the ESG Steering Committee, and published annually in the Chromewell Sustainability Report

KPI / Indicator	Target	Measurement Method	Cadence	Owner
Child Labour Incidents	Zero	Incident records	Immediate escalation	CEO / HR HOD
Forced or Bonded Labour Incidents	Zero	Incident records	Immediate escalation	CEO / Head of Compliance
Pre-Employment Age Verification Completion	100% of all new hires	HR onboarding records	Per hire	HR HOD
Zero-Fee Recruitment Compliance	100% of all hires	HR records	Annual audit	HR HOD
Supplier Code of Conduct Signature Rate	100% Tier 1 by Dec 2025	Procurement records	Annual	Purchase Manager
High-Risk Supplier Social Audit Coverage	100% by December 2027	Audit records	Annual	Compliance Executive
Staff Awareness Training Completion	100% HR/procurement/mgmt.	Training register	Annual	HR HOD

8 Policy Review Mechanism

This policy is reviewed annually every April by the HR HOD and CEO & CFO. In addition, immediate review is triggered by:

- any confirmed child or forced labour incident,
- a material changes to Indian child labour law or
- supply chain due diligence legislation, or
- Findings from an internal or external social audit

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

9. Compliance, Non-Conformance, and Disciplinary Action

- Violation of this policy constitutes serious misconduct and will result in immediate investigation and disciplinary action up to and including termination of employment or contract
- Suppliers found in breach of child or forced labour prohibitions will be subject to a time-bound corrective action plan, or contract termination where remediation is not possible
- Chromewell will cooperate fully with any statutory authority investigation

10. Related Documents and References

Internal policies:

- CW-WC-002 - Fair Working Conditions & Labour Standards Policy (working hours and overtime - voluntary; social benefits)
- CW-HSW-001 - Employee Health, Safety & Wellbeing Policy (hazardous work restrictions for young workers)
- CW-HR-006 - Anti-Discrimination, Harassment & Abuse Policy
- CW-HR-007 - Learning, Development & Competency Policy (age verification in recruitment)
- CW-PROC-SCM-001 - Sustainable Procurement & Supply Chain Due Diligence Policy
- CW-ETH-004 - Whistleblower Protection & Speak-Up Policy

External standards:

- ILO Conventions C138 (Minimum Age), C182 (Worst Forms of Child Labour), C29 (Forced Labour), C105 (Abolition of Forced Labour)
- UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol, 2000)
- Indian Child Labour (Prohibition & Regulation) Act 1986 as amended 2016
- UK Modern Slavery Act 2015
- GRI 408: Child Labour (2016) and GRI 409: Forced or Compulsory Labour (2016)
- SA8000 Social Accountability Standard - Sections 1 and 2

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
Name: Mr. Sandeep Divekar Designation: HR HOD Date: Jan 2026 Signature: 	Name: Ms. Risha Naik Designation: CFO Date: Jan 2026 Signature: 	Name: Mr. Amardeep Mardhekar Designation: CEO Date: Jan 2026 Signature: 

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.