

NEW AMBADI ESTATES PRIVATE LIMITED

Child Labor Policy

1. Objective

The objective of this policy is to eliminate the use of child labour at New Ambadi Estates (P) Ltd. (NAE in short) and ensure compliance with national and international labour laws. The plantation is committed to promoting the welfare and protection of children and adheres to ethical labour practices, ensuring that no one below the minimum legal working age is employed in any capacity.

2. Scope

This policy applies to:

- All employees of NAE, including permanent, temporary, and contract workers.
- All contractors, suppliers, and third-party service providers operating within the plantation.
- All processes related to rubber tapping, processing, transportation, and management of the plantation.

3. Definitions

1. **Child:** For the purpose of this policy, a “child” is defined as any person below the minimum legal working age as specified by local and international laws. This age is considered as 18 years in NAE context.
2. **Child Labor:** Any work that deprives children of their childhood, their potential, or their dignity, and that is harmful to their physical and mental development. This includes work that:
 - Is mentally, physically, socially, or morally dangerous and harmful to children.
 - Interferes with their schooling, prevents them from attending school, or requires them to leave school prematurely.

4. Policy Statement

NAE strictly prohibits the employment of children in any form of labour within the plantation. The plantation is committed to upholding children’s rights and adhering to local, national, and international standards regarding child labour. The plantation will not engage in child labour, either directly or indirectly, and will ensure where ever possible that its contractors and suppliers comply with the same standards.

5. Legal Framework

This policy is in compliance with the following:

- **National Labor Laws: Child and Adolescent labour (Prohibition and regulation) act 1986 (Amended 2016,** prohibits children below 14 years from engaged in any occupation or profession.

- **International Standards: International Labour Organization (ILO) Convention No. 138** on the Minimum Age for Admission to Employment.
 - **ILO Convention No. 182** on the Worst Forms of Child Labor.
 - **United Nations Convention on the Rights of the Child (CRC).**

The plantation will ensure that all activities related to hiring, contracting, and labour processes adhere to these laws and conventions.

6. Roles and Responsibilities

1. **Management:** Ensure strict compliance with this policy throughout all levels of the organization.
 1. Conduct regular checks and audits to prevent child labour within the plantation.
 2. Provide training to managers and supervisors on child labour laws and ethical labour practices.
 3. Take immediate action against any violations of the policy.
 4. Report any cases of child labour to the appropriate legal authorities.
2. **Human Resources (HR):** Verify the age of all employees and ensure no one below the minimum legal working age is employed.
 1. Maintain accurate records of all employees' age documentation, Aadhar cards, or other legally acceptable proof of age.
 2. Ensure that all recruitment processes and contracts clearly stipulate the prohibition of child labour.
 3. Work with contractors and suppliers to ensure compliance with child labour policies.
3. **Field/ Factory personnel:** Monitor and report any suspicious cases of underage workers to the plantation management or HR department.
 1. Ensure that workplace conditions are free from child labour and that all workers meet the legal age requirement.
4. **Contractors and Suppliers:**
 1. Contractors, suppliers, and any third-party entities working with the plantation must comply with this child labour policy.
 2. Any contractor or supplier found to be violating child labour laws or this policy will have their contracts terminated immediately.

7. Recruitment Procedures

1. **Age Verification:** During the recruitment process, must verify the age of all prospective employees by requesting official identification documents such as birth certificates or Aadhar Cards.

2. **Third-Party Contracts:** All contracts with third-party suppliers or contractors must include clauses that prohibit the use of child labour.
3. Suppliers and contractors must provide written confirmation to the code of conduct which includes this policy.
4. **Due Diligence:** The plantation will conduct regular assessments of its labour supply chain within the estate to identify and mitigate any risks related to child labour.
5. Any subcontractor or supplier found to be using child labour will be immediately removed from the approved vendor list, and further action will be taken, including reporting to the relevant authorities.

8. Awareness and Training

1. **Employee Awareness:** All employees will be educated about the importance of child rights and the prohibition of child labour through regular training sessions.
 1. Posters, notices, and awareness materials about the child labour policy will be displayed in common areas and relevant workspaces throughout the plantation.
2. **Contractor and Supplier Training:** Contractors and suppliers working with the plantation will receive training on child labour laws and ethical labour practices.
 1. They will be required to participate in regular audits and assessments to ensure compliance.

9. Monitoring and Auditing

1. **Internal Audits:** The management will include verification of Child labour in its internal audits to ensure compliance with the child labour policy.
 1. Audits will focus on verifying the age of all workers and ensuring that contractors and suppliers adhere to the policy.
2. **Reporting Mechanisms:** Any employee, contractor, or third party who suspects a violation of this policy is encouraged to report it to management or HR anonymously.
 1. A confidential reporting system will be set up to allow employees to raise concerns without fear of retaliation.

10. Violations and Disciplinary Actions

1. **Non-Compliance:** Any employee found to be violating this policy will face immediate disciplinary action, which may include suspension, termination of employment, and legal action.
 1. Contractors and suppliers found to be involved in child labour will face contract termination and potential legal consequences.

2. **Legal Action:** The plantation will cooperate fully with local authorities to ensure that any cases of child labour are addressed in accordance with national laws and regulations.

11. Policy Review and Updates

This child labour policy will be reviewed annually by the plantation management to ensure its continued effectiveness and compliance with evolving national and international standards. Any updates to the policy will be communicated to all employees, contractors, and suppliers.

12. Contact Information

For any queries or concerns related to this policy, please contact the following officials:

- **Unit head**
- **Compliance Officers (Field and Factory Managers)**

Mobile numbers are available on the office notice board.



Signed By: **ARUN KUMAR**
CHIEF EXECUTIVE - PLANTATIONS

Dated: 02.05.2024

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