

## **NEW AMBADI ESTATES PRIVATE LIMITED**

### **Policy on Elimination of Forced or Compulsory Labour**

#### **Policy Statement**

New Ambadi Estates (P) Ltd is fully committed to eradicating all forms of forced, bonded, or compulsory labour in any part of its operations, as well as in the supply chain. We are dedicated to maintaining an ethical and legal standard that upholds human dignity and freedom, ensuring that all employment within the company is voluntary and free from coercion. Our commitment to eliminating forced labour is rooted in both the legal framework of India and our ethical responsibility to respect and uphold human rights.

#### **Legal Backing in India**

##### **1. Constitution of India**

The *Constitution of India* explicitly prohibits forced labour under *Article 23*. This article states that "traffic in human beings and other similar forms of forced labour are prohibited." This provision upholds the fundamental right to freedom from forced labour for all individuals working in India.

##### **2. Bonded Labour System (Abolition) Act, 1976**

The *Bonded Labour System (Abolition) Act, 1976* was enacted to abolish bonded labour, a system under which individuals are forced to work to repay a debt or other obligation. The act:

- Prohibits all forms of bonded labour in India.
- Declares bonded labour agreements null and void.
- Frees bonded labourers from any financial obligations tied to such labour.
- Prescribes penalties, including fines and imprisonment, for anyone found engaging in bonded labour practices.

##### **3. Child Labour (Prohibition and Regulation) Act, 1986**

Although primarily focused on preventing child labour, this law also addresses forced labour practices involving minors. It prohibits the employment of children in hazardous occupations and regulates working conditions to prevent exploitation.

##### **4. Indian Penal Code (IPC), 1860**

The *Indian Penal Code (IPC), 1860* contains provisions under Section 374, which criminalizes the unlawful compulsion of any person to labour against their will. This legal backing ensures that no individual is forced to work under duress, threat, or intimidation.



## 5. International Conventions

India is a signatory to several International Labour Organization (ILO) conventions, including *Convention No. 29* on Forced Labour and *Convention No. 105* on the Abolition of Forced Labour. These conventions, which India has ratified, reinforce the country's commitment to eradicating forced labour in all its forms.

## Ethical Background

Beyond legal compliance, New Ambadi Estates (P) Ltd believes that forced labour is an affront to human dignity and freedom. Our ethical responsibility to ensure fair labour practices is rooted in:

- **Human Rights:** Every individual has the inherent right to freedom from exploitation, coercion, and forced labour. Forced labour violates these rights and undermines the basic principles of justice and equality.
- **Corporate Social Responsibility:** As an ethical organisation, we hold ourselves accountable for fostering a work environment free from all forms of exploitation. We also expect the same level of responsibility from our suppliers, partners, and contractors.
- **Fair Employment Practices:** Forced labour unfairly exploits individuals, often leaving them vulnerable. We aim to create a safe and fair workplace where employees are treated with respect and compensated fairly for their work.

## Scope and Applicability

This policy applies to all employees of New Ambadi Estates (P) Ltd, including full-time, part-time, temporary, and contract workers across all our operations in India. It also extends to any third-party contractors, suppliers, or partners who work with New Ambadi Estates (P) Ltd. These entities must adhere to this policy and ensure that their workers are free from forced or compulsory labour.

## Policy Provisions

### 1. Prohibition of Forced Labour

New Ambadi Estates (P) Ltd strictly prohibits the use of any form of forced, bonded, or compulsory labour in its operations. This includes, but is not limited to:

- Bonded labour, where workers are forced to work to repay debts.
- Forced overtime or extended working hours without proper compensation and consent.

- Any work performed under threat, coercion, or under terms that restrict a worker's freedom to leave employment.

Employees must be able to freely choose to work and must be free to leave their employment with reasonable notice, as stipulated in their contracts and in accordance with applicable laws.

## **2. Prohibition of Bonded Labour**

Any form of bonded labour, where workers are held to work as a condition for repayment of loans or debts, is strictly forbidden. The company will not enforce or participate in any financial arrangement that results in an employee being forced to work as part of debt repayment.

## **3. Prohibition of Human Trafficking**

New Ambadi Estates (P) Ltd is committed to preventing human trafficking in any part of its operations or supply chain. We do not engage in, support, or tolerate the trafficking of persons for labour exploitation, and we will take steps to ensure our suppliers and partners adhere to this principle.

## **4. Protection of Employees' Freedom**

Employees have the right to freedom of movement and are not to be restricted to their place of work or living quarters through force, intimidation, or threat. Employees are also free to resign from their position, provided they adhere to the terms and conditions of their employment contract.

## **5. Wage Payments**

All wages are to be paid promptly, directly to the worker, and in accordance with local labour laws. Employees will not be required to surrender any personal documents (e.g., identification papers or work permits) as a condition of employment, nor will they face wage deductions as a form of punishment.

## **6. Monitoring Working Conditions**

New Ambadi Estates (P) Ltd will ensure that working conditions are fair, safe, and transparent. All forms of forced overtime or labour without compensation are prohibited. We will provide mechanisms to allow employees to raise concerns about working conditions without fear of retaliation.

## **7. Supplier Compliance**

We require all our suppliers and contractors to comply with this policy. Suppliers must certify that they do not engage in or tolerate any form of forced or compulsory labour, and they must be able to demonstrate compliance through documentation and audits.



### **Training and Awareness**

New Ambadi Estates (P) Ltd will conduct regular training programs for all employees, particularly supervisors and managers, to ensure awareness of this policy and its implications. Training will include information on:

- Identifying signs of forced labour.
- Reporting mechanisms for suspected violations.
- Ensuring compliance with local laws and international standards on forced labour.

### **Reporting and Grievance Mechanisms**

Employees who believe they are being subjected to forced or compulsory labour, or who suspect that others are being subjected to such conditions, are encouraged to report their concerns to management or through the company's confidential grievance mechanism. All reports will be thoroughly investigated, and no employee will face retaliation for reporting violations in good faith.

### **Monitoring and Enforcement**

New Ambadi Estates (P) Ltd is committed to maintaining robust systems to monitor compliance with this policy. This includes:

- Conducting regular audits and reviews of our own operations and those of our suppliers.
- Taking corrective actions where necessary, including terminating contracts with suppliers or partners found in violation of this policy.
- Ensuring that violations are addressed swiftly and appropriately, with disciplinary action taken against any employee or manager found to be engaging in forced labour practices.

### **Responsibilities**

- **Human Resources Department:** Responsible for ensuring that all employees are informed about this policy and that any complaints are handled promptly.
- **Managers and Supervisors:** Responsible for enforcing this policy in day-to-day operations and ensuring that working conditions meet legal and ethical standards.
- **Employees:** Expected to comply with this policy and report any violations or concerns about forced labour within the company or its supply chain.



**New Ambadi Estates Pvt. Ltd.**

**Regd. Office :** Parry House, 5th Floor, 43, Moore Street,  
Chennai 600 001, India. Tel : +91-44-2530 6789

Fax : +91-44-2535 8114 **CIN: U65990TN2008PTC066257**

### **Policy Review**

This policy will be reviewed annually to ensure compliance with the latest legal requirements in India, as well as any updates to international labour standards. Any revisions will be communicated to employees, suppliers, and partners.

A handwritten signature in blue ink, appearing to read "Arun Kumar".

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

Dated: 02.05.2024

**ISSUED ON - MAY 2024**  
**VALID TILL - APRIL 2026**