

# New Ambadi Estates (Pvt) Ltd.

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## Summary of Policies

### A. Governance & Management System Policies

#### 1. Group Management Policy

Defines the governance structure and responsibilities of the FSC Smallholder Group. Establishes transparent monitoring, record-keeping, and training systems to maintain compliance and continuous improvement.

New Ambadi Estates Pvt. Ltd. (NAE) manages its Smallholder Rubber Group under FSC certification to ensure environmentally, socially, and economically responsible operations.

This policy defines the governance structure, roles, and responsibilities of the Group Entity and its members. It establishes transparent monitoring, record-keeping, and training systems to maintain compliance and continuous improvement. NAE remains fully accountable for certification integrity and performance.

#### 2. Group Membership Admission & Exit Policy

Ensures transparent and fair procedures for smallholder farmers joining or leaving the NAE FSC Group, defining eligibility criteria, decision authority, and conditions for suspension or re-entry.

This policy ensures transparent and fair procedures for smallholder farmers joining or leaving the NAE FSC Group.

It defines eligibility criteria, admission steps, decision authority, and conditions for suspension or re-entry. Farmers must meet FSC and legal requirements, uphold environmental and social commitments, and cooperate with internal audits. All membership decisions are documented and communicated in the local language.

#### 3. Internal Monitoring & Audit Policy

Outlines NAE's structured, risk-based system to verify compliance with FSC standards through annual and spot audits, ensuring transparency and accountability.

The Internal Monitoring and Audit Policy outline NAE's structured, risk-based system to verify compliance with FSC standards. Independent, trained auditors conduct annual and spot audits using standardized checklists. Findings are documented through Corrective Action Requests (CARs), tracked digitally, and reviewed annually for continual improvement. The process ensures transparency, data integrity, and accountability across all group members.

#### 4. Management System, Business Ethics & Community Relations Policy

New Ambadi Estates Pvt. Ltd. (NAE) is committed to producing high-quality, safe rubber products while upholding strong ethical, social, and environmental standards. The company strictly prohibits bribery and unethical practices, ensures compliance with all legal and tax obligations, and safeguards human rights and good working conditions. NAE promotes transparency, employee training, and continuous improvement in management systems and quality control.

Local communities are prioritized in recruitment along with competency, healthcare assistance, and participation in social and cultural development projects. All major operational changes consider the welfare and interests of surrounding communities.

Integrates ethical conduct, transparency, and community engagement into business operations, prohibiting bribery and promoting local community welfare in recruitment and development initiatives.

## **B. Ethical Conduct & Anti-Corruption Policies**

### **1. Anti-Bribery, Transparency & Whistleblower Policy**

Promotes accountability, prohibits bribery, and establishes confidential channels for whistleblowers, ensuring compliance with Indian law and international standards.

NAE enforces zero tolerance toward bribery and corruption and promotes a culture of transparency and accountability.

All employees and partners must adhere to ethical practices in line with Indian law and global conventions. The policy includes confidential reporting channels, whistleblower protection, due diligence for third parties, and disciplinary action for violations.

### **2. Policy on Bribery & Corruption**

Defines operational limits for acceptable gifts and prohibits influencing stakeholders through material benefits; violations lead to disciplinary actions.

### **3. Policy on Business Ethics, Management Systems & Community Relations**

Reinforces fairness, respect, and transparency across all dealings, with emphasis on continuous improvement, community relations, and ethical engagement.

Complementing the broader anti-bribery framework, this operational policy defines practical rules for gifts and stakeholder interactions. It prohibits all forms of bribery and corruption but allows small culturally significant gifts (under ₹1000) with mandatory disclosure. Violations result in disciplinary action, supported by a whistleblower mechanism for anonymous reporting.

## **C. Labour & Human Rights Policies**

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

Ensures that all work is voluntary, abolishing bonded or coerced labour and requiring all suppliers and contractors to comply with Indian and ILO standards.

NAE has a **zero-tolerance policy toward forced, bonded, or compulsory labour** in any part of its operations or supply chain. The company ensures that all employment is voluntary and workers are free to leave with due notice. It adheres to Indian constitutional and labour laws, as well as ILO Conventions 29 and 105. Suppliers and contractors are required to comply with this principle. Regular audits, employee training, and grievance mechanisms ensure ongoing vigilance and compliance.

### **2. Policy on Freedom of Association and Protection of the Right to Organize**

Protects employees' rights to form or join unions, promotes fair representation, and prohibits any discrimination or retaliation against union members.

NAE respects every employee's **right to freely associate, form, or join trade unions** without fear of discrimination or retaliation. The company upholds constitutional and ILO rights to freedom of association and collective bargaining. Management commits to non-interference, supports open dialogue, and protects employees from unfair treatment for exercising these rights. Contractors and suppliers are equally required to honor these principles.

### **3. Policy on Collective Bargaining**

Encourages fair negotiation between management and workers regarding wages, benefits, and working conditions, maintaining neutrality toward union activity.

New Ambadi Estates Pvt. Ltd. (NAE) actively encourages **collective bargaining** to ensure fair negotiation of wages, benefits, and working conditions. The company supports open dialogue between management and workers, allowing representation through unions or worker groups. NAE remains neutral and impartial toward union activity, permitting unrestricted access to registered unions. Wage agreements are concluded transparently and with the participation of labour officers.

### **4. Policy on Child Labour**

Prohibits employment of individuals under 18 years of age, with mandatory age verification and supplier audits to ensure full compliance.

NAE strictly prohibits child labour and enforces compliance with national and international standards. All employees, contractors, and suppliers must ensure no one below 18 years is employed. The policy mandates age verification, supplier audits, training, and grievance mechanisms. Any violation leads to contract termination and legal action.

### **5. Policy on Prevention of Discrimination**

Ensures a workplace free from discrimination or harassment, with decisions based solely on merit and competence, supported by confidential grievance mechanisms.

This policy commits NAE to a workplace free from discrimination and harassment across all employment stages.

Decisions are based solely on merit and competence, irrespective of race, gender, religion, age, or disability. The company enforces legal provisions such as the Equal Remuneration Act and POSH Act, provides awareness training, and ensures confidential reporting and fair redress of grievances.

### **6. Policy on Worker Welfare, Community, and Sustainable Forest Management (UN-SDGs)**

Integrates labour welfare with sustainable forestry and community development, aligning with UN Sustainable Development Goals on equality and environmental protection.

Aligned with the UN Sustainable Development Goals, this policy integrates worker welfare, community development, and sustainable forestry into NAE's operations.

It commits to fair wages, safe workplaces, gender equality, education support, biodiversity conservation, and climate action. NAE partners with governments and NGOs to improve livelihoods, monitor sustainability performance, and publish transparent progress summaries.

## D. Workplace Safety, Health & Well-Being Policies

### 1. Policy on Workplace Safety

Ensures compliance with Indian and ILO safety standards, requiring PPE use, emergency preparedness, and continuous risk assessments for all employees.

NAE's Workplace Safety Policy commits to maintaining a **safe, healthy, and injury-free work environment** across all operations. The company complies with the Factories Act, 1948, and other Indian safety codes, while aligning with ILO Conventions 155 and 187. Safety measures include risk assessments, PPE provision, first aid systems, and emergency preparedness. Continuous training, transparent reporting, and periodic reviews ensure constant improvement in safety standards.

### 2. Safety Policy

Promotes an injury-free workplace through regular training, audits, and preventive actions, recognizing human resources as vital assets.

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### 3. Policy on Prevention of Sexual Harassment and Safety of Women

Implements the POSH Act, 2013, through Internal Complaints Committees (ICCs), defining harassment, enforcing strict penalties, and ensuring gender-sensitive awareness.

NAE enforces a **zero-tolerance approach to sexual harassment**, ensuring a safe and respectful workplace for all employees.

An Internal Complaints Committee (ICC) investigates all complaints confidentially in line with the POSH Act, 2013. The policy defines harassment clearly, prescribes penalties, and ensures protection against retaliation. Mandatory training, awareness sessions, and periodic audits reinforce gender sensitivity and women's safety across all operations.

## E. Environmental Sustainability Policies

### 1. Policy on Waste Management / Policy on Management of Operational Waste

Minimizes waste generation and promotes segregation, recycling, and environmentally safe disposal practices under Indian and international regulations.

This policy outlines NAE's commitment to **sustainable waste management** and environmental protection. Waste is segregated at source into biodegradable, non-biodegradable, and hazardous categories. The company follows all Indian waste management regulations and international conventions (Basel and Stockholm). Regular waste audits, recycling initiatives, and staff training promote responsible waste handling and minimize environmental impact

### 2. Safety, Environment, Quality, and Sustainability Policies

NAE's integrated policies affirm its commitment to **safety, environmental protection, product quality, and sustainable practices.**

- **Safety Policy:** Strives for an injury-free workplace through regular training, audits, and preventive measures.
- **Environmental Policy:** Protects biodiversity, conserves natural resources, and ensures compliance with environmental laws.
- **Quality Policy:** Focuses on customer satisfaction through continual process improvement and stakeholder engagement.
- **Sustainability Policy:** Promotes long-term environmental and social stewardship, preventing deforestation and promoting sustainable agriculture.
- **Natural Reserve Policy:** Protects wildlife and native ecosystems within estates.
- **Replanting & Planting Policy:** Encourages replanting of high-yielding clones without using genetically modified plants, promoting biodiversity and soil conservation.

## F. Quality & Continuous Improvement Policies

### 1. Quality Policy

Commits to customer satisfaction through continual process improvement, compliance with standards, and stakeholder engagement.

### 2. Internal Monitoring & Audit Policy

Supports ongoing improvement through regular audits, corrective actions, and transparent documentation of compliance findings.

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These are summarized version of the policies implemented by **New Ambadi Estates Pvt. Ltd. (NAE)**. The **complete and detailed policy documents** are maintained at the office of New Ambadi Estates Pvt. Ltd. and they are available free co cost on demand. They are **publicly displayed on the company's notice board** as well.