



## **Child Labour SOP**



## Policy fact sheet

<b>Policy owner:</b>	HR Department
<b>Policy approver:</b>	Global CHRO
<b>Version:</b>	1.0
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<b>Scope</b>	This policy applies to all fulltime employees of UPL & its subsidiaries in India
<b>Confidential:</b>	No, for internal use only

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# 1. Purpose

UPL's child labour policy prohibits any kind of child labour practices within its premises, offices, factories, or warehouses. We have non-negotiable clauses in all our contracts prohibiting the use of child labour, UPL complies with applicable state and local laws governing child labour in employment at every location in which the company has facilities.

# 2. Scope

The Child Labour SOP is applicable to all our manufacturing sites and to all contractors.

# 3. Principles

## 3.1 Introduction

UPL expressly prohibits any form of child labour. Child Labour is the system of employing a child to provide labour or service to any person, for any payment or benefit to the child, or any other person exercising control over said child. The International Labour Organisation (ILO) uses the term 'child labour' to cover all economic activities carried out by persons less than fifteen years of age, regardless of their occupational status (wage earners, own-account workers, unpaid family workers etc.) but not household work performed by them in their parents' home, except where such work can be assimilated to an economic activity as for example, when a child must devote his or her entire time to the work so that his or her parents can be employed outside the home, and is, therefore, deprived of the possibility of going to school.

## 3.2 Dissemination and Implementation of the Policy

The following UPL officers will be responsible for the dissemination of this policy. Directors, managers, and supervisors are responsible for implementing this Child Labour SOP within each department. The HR department is responsible for overall compliance and will maintain personnel records in compliance with applicable laws and regulations.

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UPL administers its Child Labour Policy fairly and consistently by:

- Posting all required notices regarding child labour under ILO laws in locations on its premises that are highly visible to employees.
- Requiring employees to report any instance of child labour to a member of management, HR representative, or the general counsel.

The procedures listed below are to be followed to deter instances of child labour on our premises:

### **3.2.1. Daily Contractual Staff**

- Prior police verification of contractor who undertakes to produce a given result for the establishment
- Prior document submission, which includes age proof of contract labour employed by contractor
- New contract labour can enter the premises only after verification of their Aadhar Card / social security ID
- Security alert to be raised if any contract labour below the age of 18 attempts to enter the gate and eviction of such child if found on the premises
- All new contract labour must go through a mandatory medical examination at the Occupational Health Centre (OHC)
- Safety Department verifies the age of contract labour through Aadhar card and issues a Photo Identity Card
- Safety Department may interrogate any contract labour in case they doubt their age as being below 18
- Contract labour goes through BCA test monthly wherein their identity is verified
- Contract labour goes through Medical Examination annually wherein their identity is verified
- Surprise quarterly inspections of contract labour to be conducted by the Safety Department

### **3.2.2 For Non-daily Service Contractors, Drivers and Conductors**

- Request for their entry is raised by the relevant employee in the system or through a formal email attesting to the age of the visitor
- Entry into the premises to be allowed only after verification of Aadhar Card/Social security id. For Drivers, their Driving Licence is to be compulsorily checked
- Security alert to be raised if any non-daily contract labour below the age of 18 attempts to enter the gate and eviction of such child if found on the premises

### **3.2.3 For Visitors**

- Request for the visit is raised by the employee in the Visitor Management System (VMS) attesting to the age of the visitor
- A visitor can enter the premises only after verification of their Aadhar Card/Social security id.
- Security alert to be raised if any visitor below the age of 18 attempts to enter the gate and eviction of such child if found on the premises
- If a visitor below 18 years of age must enter, then a formal email approval from the Unit Head is mandatory

## **3.3 Child Labour Committee**

In line with legal regulations, UPL prohibits any kind of child labour practices within its premises, offices, factories, or warehouses. We have non-negotiable clauses in all our contracts prohibiting the use of child labour. We have added an additional clause in the contract agreement that if a child worker is found on factory premises, the contractor will be penalized with ₹50,000 directed towards the rehabilitation of the child. A Child Labour Committee is instituted to address such cases. The following are the steps to be followed if any child labour is found in factory premises:

3.3.1 The observer should bring the child to the HR department immediately

3.3.2 The HR department will call a meeting of the Child Labour Committee with the contractor

3.3.3 The Child Labour Committee will hand over the child to OHC department for medical examination

3.3.4 Based on the medical examination, the Child Labour Committee will provide direction to the contractor for rehabilitation of said child.

3.3.5 If such an instance is repeated the contractor's contract will be terminated.