

	STAR E PROCESSORS	Doc.Ref.SEP-P-09B
	Arang, Raipur, C.G (492101) India	Rev #01 Dt 01.01.2021
	Forced Labor Policy	Section 2

1. Objective	To laydown a policy for Forced Labor engaged for SEP recycling operations
2. Scope	The procedure is applicable for SEP recycling operations only
3. Responsibility	Top management, EHS Coordinator and process wise personnel

FORCED LABOUR POLICY

ABOUT THIS POLICY:

This policy shall give a clear guidance to all our supply chain members on the position we take towards forced labor. At the same time, it shall enable all involved parties in the production of our goods to avoid and remedy forced labor. Whilst we are aware of the challenges related to the detection and ending of forced labor in our supply chain, we ask our direct business partners to support this cause by cascading this policy down their own supply chain to any business involved in the recycling operations and chain till end of life of the components/materials and equipment.

OUR POSITION:

Our position is based on the ILO Forced Labour Convention No. 29 (1930), the ILO Abolition of Forced Labor Convention No. 105 (1957), The International Bill of Human Rights and The Dhaka Principles of Migration with Dignity. We are committed to working with our suppliers/Downstream Vendor chain to improve working conditions in our supply chain and to strive for the detection and ending of forced labor together with our partners. But we have a zero tolerance concerning the inaction and cover up of human rights violations like forced labor.

Therefore, we reserve the right to end our business relationship with any company who is connected to any form of forced labor and is not acting upon it or even covering it up.

DEFINITIONS

“Forced or compulsory labor is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”

The following Indicators of forced labour represent the most common signs for the possible existence of forced labour:

• Abuse of vulnerability • Deception • Restriction of movement • Isolation

1 The Global Slavery Index 2018 2 ILO Indicators of Forced Labour ([https://www.ilo.org/global/topics/forcedlabour/publications/WCMS_203832/lang--en/index.htm](https://www.ilo.org/global/topics/forcedlabour/publications/WCMS_203832/lang-en/index.htm)) ORSAY December 2018/V1 • Physical and sexual violence • Intimidation and threats • Retention of identity documents • Withholding of wages • Debt bondage • Abusive work and living conditions • Excessive overtime The presence of only one indicator can already point to the existence of forced labor. Multiple indicators can also be observed at the same time.

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4. **LABOUR RIGHTS AND FORCED LABOUR** Forced Labor must not always be intentional, but can also be derived and triggered by not respecting and not complying with labor rights. • When for example the one time non-payment of wages becomes a regular habit: “The fact of irregular or delayed payment of wages does not automatically imply a forced labor situation. But when wages are systematically and deliberately withheld as a means to compel the worker to remain, and deny him or her of the opportunity to change employer, this points to forced labor.”

By always paying wages regularly and on time as well as the agreed amount, will minimize the risk of this specific labor rights violation, which can lead to forced labor.

“Victims of forced labor are often recruited with promises of decent, well-paid jobs. But once they begin working, the promised conditions of work do not materialize, and workers find themselves trapped in abusive conditions without the ability to escape. In these cases, workers have not given free and informed consent.” A legal and written contract which has been understood by all signing parties and stating clearly the conditions of work, can help to avoid deceptions on both sides and avoid forced labor.

OUR EXPECTATIONS TOWARDS OUR DIRECT BUSINESS PARTNERS AND OUR DEEPER SUPPLY CHAIN

To be able to identify behavior which is not in compliance with this policy, recommend to our direct business partners to map their supply chain and to identify possible risk areas for the existence of forced labor.

TO AVOID FORCED LABOUR:

All work must be conducted on a voluntary basis, and not under threat of any penalty or sanctions.

The use of forced or compulsory or unpaid labor in all its forms, including prison labor and unpaid overtime work, is prohibited. 3 ILO Indicators of Forced Labor, p. 19 ORSAY December 2018/V1 5.1.3. Workers shall not be required to make deposits / financial guarantees and the identity documents of any worker (such as passports, identity cards, etc.) shall not be confiscated. No delayed payment of wages shall occur.

The right of workers to terminate their employment after legal notice shall be respected.

The right of workers to leave the workplace and factory after their shift shall be respected.

A hiring policy shall be available, including:

A clear statement against forced labour.

A process, designed to avoid any form of compulsory or forced labour.

A commitment to remedy the consequences caused by failing this policy (see below).

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REMEDY FOR WORKERS AFFECTED BY FORCED LABOUR If any form of forced or compulsory labor is detected in our supply chain, we and the appropriate authorities shall be informed immediately. The company practicing forced or compulsory labor shall remedy the damages caused, may they be related to financial, health or other matters. We will follow up the remedy process in accordance with involved authorities and conduct a root cause analysis with the company, designed to avoid further cases of forced labor.	
Reference	Guidelines from Factories Act/ Rules and ILO guidelines
Records	Minuted information/ communications maintained for child and Forced labor involvement if any accidentally in Star E Processors recycling operations.