

Child / Bonded Labour Policy (Shrenuj/Policies/2004/8)

Today, the fact of life is that we see poor children working at a very young and tender age. Many children have to work to help their families and some families expect their children to continue the family business at a young age. Though most children begin working at a young age due to economic reasons, doing so allows them to break from some social constraints. Shrenuj believes that work that precludes or seriously handicaps a child's education and upward social mobility leads to poverty, since low educational attainment reduces lifetime earnings. Child labour is a blatant infringement of human rights. It can also be surmised that work that impairs the health and safety and socialization of the child also has the same general effect. In keeping with the provisions laid down in Child Labour (Prohibition And Regulation) Act, 1986, and Bonded Labour System (Abolition) Act, 1976, Shrenuj promulgates its Child / Bonded Labour Policy as follows:

- ✦ No person who has not completed 18 years would be employed in Shrenuj and Company Limited or any of its group and /or associated companies
- ✦ Shrenuj propagates the following system:
 - « There will not be an agreement between the employee and the Company leading to forced labour and/or forcing the employee to work for a certain period of time in the Company
 - « There will not be an agreement wherein an, the employee/trainee has to pay a security deposit to the Company for a fixed time period and the deposit would then be returned to the concerned employee/trainee upon his/her completing the stipulated time period in the Company
 - « If the employee/trainee resigns from the Company's services before the stipulated time period, then he/she will not have to pay any penalty to the Company, except that is allowed by the Payment of Wages Act, 1936
 - « There shall be no clause in the appointment letter or any sort of agreement which would indicate that the employee is forced to work for the Company or in lieu of the time to be completed, would have to forfeit the monetary benefits due to him/her.
 - « No employee will be forced to perform a work beyond his normal duty hours, i.e. overtime without his express consent.

Environmental Policy (Shrenuj/Policies/2004/9)

Shrenuj and Company Ltd. believes in sustainable development and aims at preservation and promotion of the environment in all its ventures with an intention to maximise the socio-economic benefit. We commit ourselves to understanding environmental needs and meeting the expectations of individual citizens and society at large. Whilst complying with legislative and regulatory requirements, we are committed to prevent environmental pollution, minimising waste and conserving resources for generation next.

- ✦ Comply with all the relevant legislative and regulatory environmental requirements and elevate our standards of best practice by continuous improvements.
- ✦ Adopt appropriate operational practices and suitable technologies to monitor, control and minimize the impact of our activities on the environment.
- ✦ Adopt a fundamental approach to effective management of resources, which culminates into minimising waste, effluent discharge and emissions thereof.
- ✦ Promote continual learning amongst employees, vendors, and customers, about the needs and importance of environment protection.
- ✦ Foster awareness of shared responsibility and accountability for the environment among employees through a communication programme which embraces interaction and co-operation with all stakeholders including vendors and customers
- ✦ Provide relevant information on environmental policy to the concerned authorities and interested parties and ensure that the policy is understood, implemented and maintained by employees at all levels within the organisation.
- ✦ Co-operate with regulatory agencies, employee representatives and local communities to promote constructive interaction in environmental issues of mutual concern.
- ✦ Include estimates of the costs of present and expected future environmental obligations in the preparation of investment plans and annual accounts
- ✦ Prepare and update disaster management plans for managing environment risk and potential emergencies.
- ✦ Evaluate and modify environmental management practices keeping in view regulatory requirements, community concerns and technological advancements.

Equal Opportunity Policy (Shrenuj/Policies/2004/10)

Shrenuj for years together has pursued equity in all its initiatives whilst managing its diverse workforce.

Shrenuj subscribes to a policy of equal opportunity in all its dealing with employees. This policy purports creating a workforce that reasonably reflects the diversity of people working with us.

It has the following objectives:

- ✦ Race, gender, disability and creed have no effect on employment opportunities
- ✦ Factors such as gender, marital status, ethnic origin, race, religion, colour, and nationality will not be taken into account for the purposes of:
 - « Recruitment
 - « Appointment,
 - « Training,
 - « Appraisal,
 - « Promotion,
 - « Discipline etc.
- ✦ Performance and ability are the only criteria by which existing employees and potential employees are judged
- ✦ We are committed to equal opportunities for employment and growth for all. We shall seek to attract the best available talent and enhance their potential through a learning environment
- ✦ We want all our people to feel valued, comfortable and accepted
- ✦ We shall pursue a policy of transparency and fairness in our dealings with employees
- ✦ We manage diversity by creating an inclusive organization to achieve equity goals
- ✦ Diversity is seen as an organizational strength and all our employees have a role to play in helping Shrenuj gain competitive and other advantages.

Health and Safety Policy (Shrenuj/Policies/2004/12)

Shrenuj recognizes that the company has a moral, social and legal obligation towards its employees to provide safe and healthy working conditions. Safety and occupational health of all employees is one of the major concerns of the company. The company therefore, adopts and promulgates the policy set out as under for the purpose of creating and maintaining safe and healthy working environment.

- ⊕ The safety and occupational health policy of the company is to serve as an environment for creating safe physical conditions of work and for creating safety consciousness amongst all sections of employees.
- ⊕ It shall be the endeavour of the Company to identify, control and eliminate on a continuous basis hazardous conditions and situations which present risk to employees and/or possible danger or loss to factory, establishment, equipment, including products.
- ⊕ Every employee of the company is charged with the responsibility to make his personal contribution to safety.
It shall be his duty:
 - « to observe safety rules;
 - « to make use of the safety appliances supplied to him;
 - « to follow the instructions of the superior authority;
 - « not to endanger himself, other employees, plant and equipment or product etc.;
 - « to follow safe working practices;
 - « to avoid damage to any equipment or facility provided by the company for ensuring safety measures.
- ⊕ The management will have the authority to take recourse to disciplinary actions in case of violations of any of the statutory provisions on safety and occupational health as well as other rules and procedures formulated for the purpose in accordance with the Standing Orders or rules framed for the purpose.
- ⊕ It shall be the endeavour of the management to ensure complete awareness amongst the employees towards safety and safe working practices.
- ⊕ The safety and occupational health policy of the company will be adopted without prejudice to statutory provision.
- ⊕ To comply with all legal, statutory & other obligations as mentioned in National law.

HIV/ AIDS Policy (Shrenuj/Policies/2004/13)

Shrenuj has always believed that there are few things more precious than diamonds - one is our Human Resource. We recognize the gravity of HIV/AIDS epidemic in India. We also acknowledge the far-reaching impact on the micro and macroeconomics and on the workplace. HIV/AIDS is a chronic, life threatening disease with social and human rights implications. To care for valuable human assets, we have laid down this policy on HIV / AIDS.

- ✦ First & foremost the fight against HIV/AIDS has absolute management support and commitment
- ✦ In addition to employees, families and communities are critical to the success of our strategy
- ✦ Ensuring that messages about HIV/AIDS are clearly understood by everyone who works for Shrenuj to enable them to make decisions about their own health and wellness and ultimately to change behaviour and create awareness amongst all employees.
- ✦ Enhancing the quality of life of people living with HIV/AIDS through a holistic approach to health and wellness.
- ✦ If a Shrenuj employee and his/her spouse or life partner tests HIV positive, we are committed & assure such employees of confidentiality of their medical condition and medical records.
- ✦ Voluntary counselling and testing is an important and enabling component of a disease management programme and we actively encourage people to know their status.
- ✦ We are committed to non-discrimination towards employees in the workplace, particularly on the basis of HIV status, in joining the company or continuing their employment, training opportunities, promotions, or providing other benefits. Pre-employment medical tests will not include tests for HIV/AIDS.
- ✦ Employees who are diagnosed with an AIDS virus-related condition may continue to work if they are deemed medically able to work and can meet acceptable performance standards.
- ✦ People living with HIV/AIDS are guaranteed equal individual right and protection .

Human Rights Policy (Shrenuj/Policies/2004/14)

Shrenuj believes that recognition of the inherent dignity, equal and an inalienable right of all members of the human family is the foundation of freedom, justice and peace in the world. Disregard and contempt for human rights have resulted in barbarous acts, which have outraged the conscience of mankind, and have increased the need for protection of human rights. Shrenuj advocates it's human rights policy as under:

- ✦ Everyone has the right to life, liberty and security of person.
- ✦ Every employee has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance, without having any fear of job security.
- ✦ All employees have the right to
 - « Freedom of speech and expression
 - « Assemble peaceably and without arms
 - « Form associations or unions
- ✦ No employee shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all forms.
- ✦ No employee shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
- ✦ The company shall not discriminate against any of its employees on grounds only of religion, race, caste, sex, place of birth or any of them.
- ✦ In line with Article 17 of the Indian Constitution Shrenuj supports the abolishment of "Untouchability" and its practice in any form is forbidden. There will not be any enforcement of any disability rising out of "Untouchability."
- ✦ Cultural diversity is valued as an organizational strength, and contributes to organizational success.
- ✦ Anyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defence. However, conviction by any court of law for any criminal offence involving moral turpitude will be considered as a misconduct and appropriate disciplinary action will be initiated.

- ⊕ Performance and ability are the only criteria by which existing employees and potential employees are judged
- ⊕ All the rules and regulations in force or framed by the company or it's subsidiaries in so far as they are inconsistent with the clauses of this policy shall, to the extent of such inconsistency, be void.

Sexual Harassment Policy (Shrenuj/Policies/2004/15)

Sexual harassment is a form of violence against women. It is a form of assault, which can manifest itself in terms of physical and psychological acts. Physically, the recipient may be the victim of pinching, grabbing, hugging, patting, leering, brushing against and forms of touching. Psychological harassment can occur through the proposal of physical intimacy by requesting dates and sexual favors, or by making lewd and indecent remarks, which embarrass the recipient.

Shrenuj has always believed in equity of gender and for this very purpose we subscribe to a policy of equal opportunity in all its dealing with employees. In keeping with this policy, Shrenuj promulgates Sexual harassment policy as under:

- ⊕ This policy is applicable to all allegations made against an employee, irrespective of whether sexual harassment is alleged to have taken place within or outside Company premises.

- ⊕ What constitutes Sexual Harassment?
 - « Sexual harassment can be defined as unwelcome sexual advances, requests for sexual favours, and other verbal and physical conduct of a sexual nature when:
 - « Submission to that conduct is made either explicitly or implicitly a term or condition of an individual's employment;
 - « Submission to or rejection of that conduct by an individual is used as the basis of employment decisions affecting the individual; or
 - « The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.
 - « This conduct includes:
 - a. Unwanted physical contact or conduct of any kind, including sexual flirtations, touching, advances, or propositions;
 - b. Verbal harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references;
 - c. Demeaning, insulting, intimidating, or sexually suggestive comments (oral or written) about an individual's personal appearance or electronically transmitted messages;
 - d. The display in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects, pictures, or photographs.
 - e. Unwelcome sexual tone in any manner such as over telephone (obnoxious telephone calls) and the like.

- ⊕ Based on these criteria, sexual harassment typically is categorized into two types:
 - « "Quid Pro Quo (this for that) Harassment": Sexual harassment by managers and supervisors generally is considered "quid pro quo" harassment when it involves the solicitation of sexual favours in exchange for some type of employment decision. To

prove quid pro quo harassment, a complaining employee must show that he/she was subject to an unwelcome request for sexual favours by a supervisory employee and that his/her acquiescence to, or rejection of, the request was used as the basis for decisions affecting his/her compensation, terms, conditions, or other privileges of employment. Preferential Treatment also may constitute quid pro quo harassment.

- « “Hostile Work Environment Harassment”: Harassment by non-supervisory employees generally falls into the category of “hostile environment” sexual harassment rather than “quid pro quo” harassment. Typically, there is no direct link between the offensive conduct and a tangible job benefit or detriment in hostile environment cases. An employer is responsible for hostile environment harassment by non-supervisory employees only if the employer knew or should have known of the harassment and failed to take immediate and appropriate remedial action.
- « Sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, non-supervisory employees, or non-employees, is prohibited.
- « Any of the above conduct, or other offensive conduct, directed at individuals because of their race, caste, creed, religion, physical disability, family background, pregnancy or age is also prohibited.
- « Any employee, supervisor, or manager who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination. The Company prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.
- « Any employee undergoing sexual harassment should immediately report the matter to the concerned HR department.

Waste Management Policy (Shrenuj/Policies/2004/16)

Urban India is likely to face a massive waste disposal problem in the coming years. Until now, the problem of waste has been seen as one of cleaning and disposing as rubbish. But a closer look at the current and future scenario reveals that waste needs to be treated holistically, recognising its natural resource roots as well as health impacts. Waste can be wealth, which has tremendous potential not only for generating livelihoods for the urban poor but can also enrich the earth through composting and recycling rather than spreading pollution as has been the case. Increasing urban migration and a high density of population will make waste management a difficult issue to handle in the near future, if a new paradigm for approaching it is not created. Shrenuj has formulated Waste management policy in line with the Municipal Waste Management and Handling Rules 2000, as follows:

- ✦ Adopt a fundamental approach to effective management of resources, which culminates into minimising waste, effluent discharge and emissions thereof.
- ✦ Promote continual learning amongst employees, vendors, & customers, about the needs & importance of waste management.
- ✦ Setting up of waste processing and disposal facilities (solid & liquid waste)
- ✦ Have a written procedure for waste management in every area.
- ✦ Monitoring the performance of waste processing and disposal facilities
- ✦ Ensure that waste is disposed at the proper location so as to minimize pollution.
- ✦ Co-operate with regulatory agencies and local communities to promote constructive interaction in environmental issues of mutual concern
- ✦ Provide relevant information on waste management policy to the concerned authorities and interested parties and ensure that the policy is understood, implemented and maintained by employees at all levels within the organisation.
- ✦ Evaluate and modify waste management practices keeping in view regulatory requirements, community concerns and technological advancements.

Chairman

Note: The Company reserves the right to add, amend, alter or change the said guidelines as per the exigencies of business and with any change in the National law thereof.