

DOC.NO POL-PRPL-11 REV.NO :- 01 DT:- 01.04.23

## **Prohibition of Force Labour Policy**

### 1. Definition

All work must be voluntary. Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. PR Packagings Ltd or labor dispatch agencies shall not receive deposit or fees (e.g. recruitment or hiring fees) from workers. In addition, labor conditions must be provided in written form to the workers in the language that they are able to understand.

## 2. Scope

This Guide applies to PR Packagings Ltd, their supply chain and subcontractors (including labor dispatch agencies). PR Packagings Ltd shall recommend that their supply chain and subcontractors (including labor dispatch agencies) comply with this Guide.

### 3. Guide

- 1) Policy and Procedures
- -PR Packagings Ltd shall establish adequate policies and procedures to ensure that any type of forced, bonded (including debt bondage), involuntary prison, or trafficked labor is not used.
- -In the case of hiring workers through a labor dispatch agency, the PR Packagings Ltd shall only conduct business with labor dispatch agencies which have legal and valid licenses and shall enter into a labor dispatch contract with the agency.

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- -The PR Packagings Ltd shall require a labor dispatch agency to have documented policies and procedures in compliance with this Guide, and systems of monitoring compliance with the relevant policy shall be in place.
- -All workers and labor dispatch agencies shall be trained with restrictions on forced labor and have relevant training records.
- 2) Fees and Deposits
- -The PR Packagings Ltd or labor dispatch agency shall make it a rule not to ask any worker to pay deposits or fees (e.g. recruitment or hiring fees).

  Based on EICC criteria, PR Packagings Ltd shall not charge foreign workers any Employment-related fees and costs and recommend that PR Packagings Ltd comply with the same criteria, too
- 3) Free to Conclude and Terminate Employment Contract
- -Workers shall be free to conclude and terminate an employment contract with the PR Packagings Ltd.
- -Termination notice period shall not exceed one month.
- -Workers shall not be restricted from voluntary employment termination, and no penalty, including penalty for termination, shall be imposed on relevant workers.

### 4) Voluntary Overtime Work

- -For all overtime work outside regular working hours, the PR Packagings Ltd shall obtain workers' voluntary consents, and shall not force them to work overtime.
- -Procedures for obtaining a prior consent from a worker or employee representative organization shall be established.

### 5) Repayments of Personal Loans and Education Grant

- -In the case of supporting education, grant repayment from workers cannot exceed 10 percent of monthly wage.
- -The monthly amount of personal loan repayment cannot exceed 10 percent of monthly wage, and its interest rate cannot be higher than the one set by local regulations.

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### 6) Employment Contract

- -Workers including foreign workers shall conclude an employment contract in their native language that is easily understood.
- -The following details shall be included in a written employment contract, illegal terms and conditions (e.g. Terminating a worker's employment solely based on her pregnancy status) that go against local laws shall not be included:
- · Company name, address, legal representative or responsible person
- · Worker's name, address, identity card or other identification cards' number
- · Composition items and calculation method of wage (base pay, other Allowances such as overtime allowance, wage deduction, etc.), payment Method
- · Term of Employment, revocation of contract/resignation procedures and clauses
- · Details of work, regular working hours and break time
- · Legal holidays or days off
- · Welfare benefits (Social insurance, accommodation, meal, transportation, working clothes)
- · Working conditions set by other local regulations
- -Before the start of worker's employment or during a period designated by local regulations (e.g. In China, within one (1) month after joining a company), the PR Packagings Ltd shall conclude a written employment contract directly with a worker and give the worker one (1) original contract document.
- -Documents (e.g. receipt confirmation) guaranteeing that a worker receives a written employment contract shall be kept.
- -For a foreign worker, terms and conditions of employment contract shall be provided to foreign worker before departure from their home country or region.
- -After conclusion of this employment contract, it cannot be changed to worse conditions (e.g. low wages, relocation to other production facility, imposition of unnoticed fees such as accommodation/meal, etc.). The PR Packagings Ltd must check if a dispatch worker concluded an employment contract with labor dispatch agency in a legal manner, and a copy of the written contract shall be kept...
- -Documents about registration of workers and employment contract shall be kept during the statute of limitations.

### 7) Restrictions on Keeping Workers' Original Personal Documentation

-Under no circumstances can the PR Packagings Ltd request the transfer of workers' original personal documentation (e.g., Passport, work visa/permit, identification,

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social security/insurance cards/documents, birth certificate, wage cards, bank documents, etc.)

- -If needed, the PR Packagings Ltd shall manage a copy of personal documents with a worker's consent, and if the statute of limitations has expired, it shall destroy the copy of personal documents immediately.
- -In the case that local law requires employers to hold foreign workers' personal documents or in the case of foreign workers' voluntary request for keeping their personal documents, relevant procedures shall be in place for safe keeping. Personal documents must not be tampered with or damaged in any way. In addition, procedures (e.g. management of personal document access records) ensuring workers are guaranteed the return of their documents within twelve (12) hours of the request shall be in place.
- -Under no circumstances shall a fee for the safe keeping of personal documents be imposed on workers.
- -A place to keep workers' personal documents in a safe manner shall be provided.
- -Policy and procedures for complying with items mentioned above shall be established and maintained.

### 8) No Unreasonable Restrictions on Freedom of the Movement

- -Except for cases allowed for worker safety or by local regulations, there shall be no unreasonable restrictions on the movement of workers such as toilets, drinking water, external medical facilities, factory/dormitory exit and entry. Movement to/from toilets or drinking water should not be allowed except for at certain times, and non-coercive restrictions system such as toilet passes shall be operated.
- -Factory/dormitory exits shall be always open to ensure that workers can escape from these areas in emergency situations such as fire, etc.
- -Workers shall freely move to and from the dormitory when not engaged in work.

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# Freedom of Association Policy

DOC.NO.POL/PRPL/24

REV. NO. & DT. 01, 01/04/23

# TITLE: Freedom of Association Policy

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P R PACKAGING allow employees to associate freely & bargain collectively without any fear & hence Glimpse India respect the right of all personnel.

- 1.P R PACKAGING maintains excellent rapport with the workers and as a result of this the workers have selected their representatives
- 2. The company practices an open and honest culture.
- 3. The employees are free to speak to the management on any matter relating to working conditions, facilities provided or other matters that affect them.
- 4. The employees are free to bargain collectively.
- 5. Representatives of the employees are not subject to discrimination.
- 6. Communication with third parties that may perform recruitment or screening of the applications regarding recognizing freedom of association.
- 7. PR Packaging allow to assemble peacefully.

Approved by

MINITER

Date : 14/93



#### NON-DISCRIMINATION POLICY

DOC.NO:-POL-PRPL-03

REV.NO :-01 DT:- 01.04.23

### **Non-Discrimination Policy**

#### 1. Definition

PRPL Co. shall be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards and access to training. In addition, unless medical tests are required for legal or safety reasons, workers or potential workers shall not be subjected to medical tests that could be used in a discriminatory way.

### 2. Scope

This Guide applies to PRPL Co., their supply chain and subcontractors (including labor dispatch agencies). PRPL Co. shall recommend that their supply chain and subcontractors(including labor dispatch agencies) comply with the Guide

#### 3. Guide

### 1) Policy and Procedure

- -The PRPL Co. shall establish policies and procedures that ban discrimination based on personal characteristics such as race, age, color, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership or marital status, etc.
- -The PRPL Co. shall establish adequate policies and procedures which do not require any workers or potential workers to have medical tests that can be used in a discriminatory way except for the cases required for local laws or workplace safety.
- -The PRPL Co. shall establish policies and procedures which any discrimination acts can be anonymously reported by all workers, guarantee anonymity of reporter, and give the reporter feedback on results of disciplinary actions within an appropriate period.
- -Policies and procedures mentioned above shall be documented and shared with all workers including managers in worker training, worker handbooks, notice board posting, etc.
- -Procedures including recording and keeping all written records of disciplinary action against discrimination acts shall be established.
- -The PRPL Co. shall require labor dispatch agencies to hold documented policies and procedures in order to comply with this Guide and continuously check if agencies comply with it.

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#### NON-DISCRIMINATION POLICY

DOC.NO:-POL-PRPL-03

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### 2) Non-Discrimination

-The PRPL Co. shall ensure that any decisions in hiring, employing (such as compensation, promotion, access to training) or terminating workers are based solely on the worker's ability to perform the job's requirements and performances, not on personal characteristics.

-The PRPL Co. should not require any workers to have medical tests including hepatitis B (and pregnancy tests for female workers s) or to give the results of medical tests, except for cases required for local laws or for workplace safety. The PRPL Co. shall also not discriminate against any worker based on the worker's refusal to take a medical test or the worker's pregnancy status.

-In order to ensure that discrimination acts do not occur at the workplace, the PRPL Co. shall continuously train workers for all relevant policies once a year or more and keep relevant training records.

-Once a report on discrimination acts is received, the PRPL Co. shall check fact relevance immediately, take proper actions according to policies, and give a reporter the feedback on the results of disciplinary action. -Retaliation, of any kind, against a reporter is strictly prohibited. The PRPL Co. shall continuously manage procedures for preventing any retaliation. If it is required to modify procedures, the PRPL Co. shall improve them right away.

The PRPL Co. shall not separate cafeterias of managers and workers or provide different types of foods to managers and workers separately (i.e. the PRPL Co. must provide same foods at the same place).

The ratio of dispatch workers shall not exceed ten (10) percent of total workers, and the wage standards of regular and dispatch workers performing same jobs shall be equal.

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# **Anti Corruption Policy**

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TITLE: Anti Corruption Policy

PR PACKAGING is committed to conducting its business with honesty and integrity and in compliance with the laws of all the countries in which the Company is active. This includes compliance with all laws,

domestic and foreign, prohibiting improper payments or inducements to any person, including public

officials, the Company has adopted this Anti-Corruption Policy. This Policy applies, subject to and in accordance with any applicable local law or legal requirement, to each director, officer and employee of PR PACKAGING, and of each of its direct or indirect subsidiaries to which the PR PACKAGING Code of Business Conduct applies, and to each agent, representative, consultant and independent contractor acting on behalf of the Company or any such subsidiary (collectively, "Company Personnel"). Subsidiaries not covered by the PR PACKAGING Code of Business Conduct are expected to adopt their own policies equivalent to this Policy. Unless the context otherwise requires, references to the "Company" in this Policy include the Company's direct and indirect subsidiaries and controlled affiliates, individually and collectively.

# **Statement of Policy**

Company Personnel shall not permit any use of the funds or other assets of the Company for any unlawful or improper purpose.

## Company Personnel shall not

- make, or authorize anyone to make on behalf of the Company,
- any payments or gifts or offers or promises to pay money or give anything of value to or for the benefit of any person, including any "Public Official",
- that is or may appear to be related to obtaining or retaining business with any
  person, directing business to any person, obtaining any other advantage in the
  conduct of business, or inducing or rewarding the "improper" performance by any
  person of any function or activity
- or consent to, or connive in, any of the above.

APPROVED BY

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1/4/23 Date



### ANTI HARASSMENT & ABUSE POLICY

DOC.NO.POL/PRPL/23

REV. NO. & DT. 01. 01/04/23

TITLE: Anti Harassment & Abuse Policy.

PAGE 1

Company is committed to provide safe, Harassment and abuse free work place.

Employees will be free from all types of indecent, verbal, physical and sexual harassment and other discriminatory practices.

Use of indecent language, Behaviour action is strictly prohibited.

All employees will work as a team and contribute towards growth of the company.



# **Standard Operating Procedure**

Doc. No. SOP/HR/01

Rev. No & Date. 02, 01/04/23

Page no: 1 of 2

Title: - MISCONDUCT AND SEXUAL HARRASMENT

### 1. PURPOSE

To address the misconduct and sexual harassment problem of the employees.

### 2. SCOPE

This procedure applies to all the employees working at PRPL including the contractor's workers.

## 3. PROCEDURE FOR SEXUAL HARRASMENT

- All the sexual harassment complaints will be directly handled by the Manager HRD.
- Manager HRD will investigate the matter in the presence of the workers committee members.
- The workers working in the neighboring area, where the victim is working, will be enquired.
- Manager HRD will submit his report to the top management.

## 4. PROCEDURE FOR MISCONDUCT

- 1. The following acts & fall under the category of misconduct under Factories Act, 1948-
  - 1. Theft
  - 2. Fraud
  - 3. Dishonesty
  - 4. Taking or giving bribes
- 10. Smoking
- 11. Sleeping on duty
- 12. Sleeping down of work
- 13. Coming damage to company property deliberately

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Date: 493



# **Standard Operating Procedure**

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Title: - MISCONDUCT AND SEXUAL HARRASMENT

- 5. Habitual late attendance
- 6. Habitual absent without leave
- 7. Drunkenness at working
- 8. Fighting
- 9. Indecent behavior

- 14. Conviction in any court of law
- 15. Giving false information
- 16. Breach of confidential and security of information
- 17. Failure of use of safety equipment provided by company.
- 2. The incharge of the area will submit a written report for misconduct.
- 3. Inquiry will be done by a mutually selected person.
- 4. The selected person should not belong to the same area and must be independent to conduct the inquiry.
- 5. He will inquire the person and two witnesses from incident site.
- 6. He will submit a written report within a week with suggested actions.
- 7. Report will be forwarded to management and actions finalized by management shall be final.

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#### PROHIBITION OF CHILD LABOUR POLICY

DOC.NO:-POL-PRPL-05

REV.NO :- 01 DT:- 01.04.23

## **Prohibition of Child labour Policy**

### 1. Definition

Child labor is not to be used in any stage of manufacturing. The term "Child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. If any child labor is detected, the Supplier shall immediately take required action steps. The Supplier shall immediately stop such child labor and improve the reviewing process regarding the age of the worker during recruitment. The use of legitimate student intern programs, which comply with all laws and regulations, is supported. Young workers over the legal minimum age for employment may be hired; however, young workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers, including night shifts and overtime.

#### < Terms >

**Young worker** A worker older than legal minimum age for employment in the Country or 15 years of age, whichever is greatest, but who is younger than 18 years of age.

**Student intern** A worker regardless of age, who is registered at an educational Institution and employed by supplier for a program arranged by the educational institution.

**Educational institution** An institution which offers programs of that lead to a Certification, degree, or diploma which is at least 1 academic term.

Night work Any work carried out between 10:00 p.m. and 5:00 a.m.

Hazardous work Certain sectors and occupations which are more dangerous than others including underground, underwater, dust, high place, high Temperature, low temperature work and noise processing, chemicals/radio substance handling, works with vibration equipment, etc

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#### PROHIBITION OF CHILD LABOUR POLICY

DOC.NO :- POL-PRPL-05

REV.NO :- 01 DT:- 01.04.23

### 2. Scope

This Guide applies to PRPL suppliers, their supply chain and subcontractors (including labor dispatch agencies). PRPL suppliers shall recommend that their supply chain and subcontractors (including labor dispatch agencies) comply with the Guide.

### 3. Guide

### 1) Policy and Procedures

- -Under any circumstances, the Supplier shall prohibit child laborers from being hired, and shall document and hold a child labor prohibition policy specifying the legal minimum working age.
- -All workers shall be trained on the child labor prohibition policy, and training materials/records shall be kept.
- -The Supplier shall ensure the child labor prohibition policy is permanently posted at the entrance of workplaces, dormitories, cafeterias, and lounges in order to share the policy with all workers. Ways (hotline, etc.) of reporting anonymously if any child labor exists at workplace shall be provided.

## 2) Employment Process

- -An employment process which can check identity of applicants in order to block any attempt to hire a child laborer shall be established and implemented.
- -Age-verification shall be based on visual verification of government-issued photographic ID, and its validity shall be verified through cross-checking the following methods.
- · Verification through Internet or local government offices
- $\cdot \ \, \text{Government-issued birth certificate, voting registration card}$
- · "Official stamped" copy of a school certificate
- · Government-issued documents which can confirm date of birth, such as foreigner work permits -In China, the Supplier shall comply with the following employment process.

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