

CORPORATE SOCIAL RESPONSIBILITY & ETHICS POLICY

VEER-O-METALS Pvt. Ltd.

VEER-O-METALS Pvt. Ltd. (E.O.U.)
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CORPORATE SOCIAL RESPONSIBILITY POLICY

Veer-O-Metals Pvt, Ltd, during its long journey of 50 years, has upheld and adhered to certain values in our business practices, in which our social responsibility and commitment is considered as vital. This **Corporate Social Responsibility Policy** is formulated inline with the principles of the U.N. GLOBAL COMPACT. Also being an **active Participant of the U N Global Compact & a member of Global compact Network, India**, we promise to embrace, support and enact, within our sphere of influence, a set of core values derived from:

- the Universal Declaration of Human Rights
- the ILO's declaration on Fundamental Principles and Rights at Work
- the Rio declaration on Environment and Development
- the Global Compact requirement of Anti-Corruption

The 10 universally accepted Principles, as stipulated by the U. N. Global Compact, and to which we are adhered to are:

(HUMAN RIGHTS)

1. *Business should support and respect the protection of internationally proclaimed Human Rights.*
2. *Make sure they are not complicit in Human Rights abuses*

(LABOUR)

- 3. Business should uphold the freedom of association and the effective recognition of the right to Collective Bargaining*
- 4. The elimination of all forms of Forced and Compulsory labour*
- 5. The effective abolition of Child Labour*
- 6. Eliminate Discrimination in respect of Employment and Occupation*

(ENVIRONMENT)

- 7. Business should support a precautionary approach to environmental challenges*
- 8. Undertake initiatives to promote greater environmental responsibility*
- 9. Encourage the development and diffusion of environmentally friendly technologies*


(ANTI-CORRUPTION)

- 10. Business should work against all forms of Corruption, including Bribery*

All our employees, suppliers, people engaged in contract work, visitors or any person within the company premises are expected to respect and follow the systems and procedures as laid down according to this 'Corporate Social Responsibility Policy'.

AUTHORIZED SIGNATORY

02.04.2015

A handwritten signature in black ink, appearing to be 'A. S.', written over a faint rectangular stamp or grid.

CORPORATE SOCIAL RESPONSIBILITY POLICY

1.0.0. Human Rights

1.1.0. Protection of Human Rights

1.1.1. We, at Veer-O-Metals, swear that we support and respect the Protection of Internationally proclaimed Human Rights

1.1.2 We strive to comply with all applicable civil rights, Human rights, Environmental and Labour laws

1.1.3. We will not engage in any activities that do not maintain individual dignity and respect, even if permissible under applicable laws.

1.2.0. Freely Chosen Employment

1.2.1. All employment will be Voluntary, and employees are free to leave up on reasonable notice, as been informed during appointment.

1.2.2. Employees are never asked to surrender any of their Government-issued identification like Passport, ID cards, Driving license etc; nor their Original certificates of Education, experience etc, except for the purpose of verification at the time of joining, in which case the same will be returned, immediately after the verification.

1.3.0. Wages and Benefits

1.3.1. All regular employees are paid the wages on a monthly basis and the emoluments are far above the minimum wages stipulated by law. The break up of total salary is as below

1. Basic Salary
2. House Rent Allowance

3. Conveyance Allowance
 4. Special Allowance – Depends on type of work, location, shift etc
 5. Ex-gratia – Related to productivity / quality etc.
- 1.3.2. Over time wages will be paid, for any extra hours of work, if done on emergencies.
- 1.3.3. Other than the monthly salary, employees are eligible for statutory benefits like Provident fund, ESI, Gratuity etc.
- 1.3.4. The HRD will verify and ensure that all the contract employees, if any, will be receiving the emoluments, higher than the minimum wages and all other statutory benefits.

1.4.0. Humane Treatment

- 1.4.1. There will not be any harsh or inhumane treatment to any of the employees.
- 1.4.2. No sexual harassment or sexual abuse.
- 1.4.3. No Physical or mental coercion or verbal abuse of employees

2.0.0. Labour

2.1.0. Freedom of Association

- 2.1.1. In Veer-O-Metals, we encourage open communication and the involvement of all employees and sincerely appreciate their contributions.
- 2.1.2. We respect the right of employee to associate freely, to join or not join unions / associations and to seek representation.

- 2.1.3. Each one can openly express their views / concerns regarding the working conditions, welfare measures, health & safety etc, without any fear of reprisal, intimidation or harassment.
- 2.1.4. Many steering committees are formed with representation of employees from various areas of operation for 5S, EHS, welfare etc.
- 2.1.5. Suggestion boxes are kept at different locations in the factory, for employees to forward their suggestions to the management

2.2.0. Forced and Compulsory labour

- 2.2.1. No employee will be compelled or forced to do any particular work, as a means of Labor discipline, Punishment or as a means of racial, social, national or religious discrimination.
- 2.2.2. Equal opportunity and fair treatment are ensured to all.

2.3.0. Child Labour Avoidance

- 2.3.1. Any employee at the time of joining with VOM has to complete 18 years of age. Not a single person, below 18 years of age, will be allowed to engage in any job within the company premises

2.4.0. Working Hours

- 2.4.1. The normal working hours at VOM is fixed as 8 Hrs per day, with 30 minutes Lunch break and two 15 minutes tea breaks.
- 2.4.2. We work 6 days a week with Sunday as weekly Holiday. No body will be asked to work more than 48 Hrs per week, as their normal duty.
- 2.4.3. There will be different shifts, in the manufacturing department, as and when required, according to the work load.
- 2.4.4. Women employees are not asked or allowed to work between 7 00 PM to 6 00 AM, under any circumstances.

2.5.0. Non-discrimination

- 2.5.1. We will not have any discrimination on the basis of Age, Disability, Ethnicity, Marital or family status, National origin, Race, Color, Religion, Sex, Veteran status or any other characteristics protected by law, for appointment, occupation and promotion.
- 2.5.2. We will treat all employees equal in humane aspect, and there will not be any discrimination in respect of employment and occupation.
- 2.5.3. We promote suitable job opportunity for the disabled.
- 2.5.4. We expect all employees to treat one another with respect and dignity.

2.6.0. Health and Safety

- 2.6.1. Veer-O-Metals has taken due care to ensure that our activities are not hazardous to the health and safety of our Employees, Subcontractors, the local community and our end customers.
- 2.6.2. Personal Protective Equipments are provided to all employees, according to their area of working.
- 2.6.3. All material handling and storing devices are equipped with necessary safety features
- 2.6.4. Machines are fitted with safety equipment, as required
- 2.6.5. Work stations are properly ventilated, illuminated and having sufficient space for moving around
- 2.6.6. Worker exposure to physically demanding tasks like manual material handling, heavy materials lifting, prolonged standing etc are identified, evaluated and controlled
- 2.6.7. Emergency situations are identified and assessed and their impact minimized by implementing emergency plans like emergency reporting, employee notification, evacuation procedures, adequate & highlighted exit facilities etc.

- 2.6.8. Sufficient Fire suppression equipments are provided at identified locations.
- 2.6.9. A detailed Medical Check-up will be conducted for all the employees, every year.
- 2.6.10. Proper training is given to employees in Fire fighting, First aid, maintaining Industrial Hygiene, etc
- 2.6.11. Employees are provided with Healthy & hygienic working atmosphere , Rest rooms, Clean toilet facilities and Potable water

2.7.0. Substance-free work place

2.7.1. The following are strictly prohibited within the company premises:

- Consuming, selling or possessing of illegal drugs or other controlled substances
- Using or possessing Alcohol
- Being under the influence of alcohol, illegal drugs or other controlled substances
- Smoking in any area, other than the place identified for it.

3.0.0. Environment

3.1.0. Environmental Permits and Reporting:

3.1.1 All necessary Permits, Registrations etc., related to the environment, as directed by law will be obtained, maintained and renewed on time

3.2.0. Pollution Prevention and Conservation of resources:

3.2.1 Effluent, if any, from the production process will be treated as per the regulations and the treated water could be re-circulated for process

requirement. By doing this, we help to protect the environment and conserve water.

- 3.2.2** Treatment plant is set up for Sewage water and the treated water is reused for toilet flushing and gardening only.
- 3.2.3.** All necessary preventive measures are taken for ensuring that the atmospheric air is not being contaminated due to our manufacturing process
- 3.2.4.** Noise level is controlled by installation of Acoustic Enclosures for Diesel Generators and have the stocking chimneys as per the regulations.
- 3.2.5** Most of the soft packaging likes Cardboard boxes, Polypropylene cases are being reused and hence the consumption and disposal get reduced.
- 3.2.6.** Due awareness on Environment protection and conservation of resources is given to all employees
- 3.2.7.** Hazardous substances as in the Global RoHS regulations are not used in any of the production process or products

4.0.0. Ethics

- 4.1.0.** We, at Veer-O-Metals, insist and develop all employees to meet and maintain high standards of Ethics.
- 4.1.1.** Integrity and accountability must be maintained in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited and will lead to disciplinary action, including termination of service and legal action.
- 4.1.2.** Improper advantages like Bribe or other means of obtaining undue benefits are not to be offered or accepted

- 4.1.3.** Employees are advised not to accept or give any gifts or offers from / to any one with whom Veer-O-Metals have business relation.
- 4.1.4.** Every business decision, and related activity are to be the best interest of the company, and not on personal interest or relations
- 4.1.5.** Fraud, or the act or intent to cheat, trick, steal, deceive or lie is dishonest and in many cases, criminal intentional act of fraud by any employee is subject to strict disciplinary action, including termination of employment
- 4.1.6** Intellectual property rights of Veer-O-Metals, its affiliates subsidiaries, Customer, Suppliers, Auditors & Consultants need to be respected and protected.
- 4.1.7** All employees have the responsibility to safeguard the customer information.
- 4.1.8** All communication data and information sent or received using company equipment are the property of Veer-O-Metals and the management reserves the right to monitor all communications, including internet usage.
- 4.1.9** Information regarding business activities, organization structure, financial situation and performance status are disclosed, in accordance with applicable regulations.
- 4.1.10** All employees are made to sign a Nondisclosure Agreement, at the time of induction and advised to strictly follow the IT policy and HR policy.
- 4.1.11** Any employee, if so decides, to serve as part-time employee, agent, representative, consultant or in any other manner of business association with any other organization, must obtain a written permission from the Management, to do so.
- 4.1.12** Veero commits to deliver as promised and as such commits faithfulness in all its marketing and advertising messages and content including PPT offers, Websites advertisement, exhibition display etc.

5.0.0. Management Systems

- 5.1.0.** Management is committed to the following systems, related to this policy
 - 5.1.1.** Enforce the Social Responsibility Policy affirming to compliance and continual improvement
 - 5.1.2** Identification, understanding and monitoring of applicable laws, regulations and customer requirements
 - 5.1.3** Identifying the Management representative, responsible for tracking implementation and conducting periodic review of the management systems
 - 5.1.4.** To identify the environmental, health & safety and labour risks associated with company operations and ensure regulatory compliance to control the identified risks.
 - 5.1.5.** Ensure written standards, objectives, targets and implementation plan. Conduct periodic assessment of performance against the plan.
 - 5.1.6.** Provide training to all employees to implement policies, procedures and improvement objectives
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6.0 "WHISTLEBLOWING" POLICY (Making a Disclosure in the Public Interest)

Introduction

Veer-O-Metals Pvt. Ltd is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or

wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management or HRD or Top management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

Scope of Policy

The purpose of the policy is to create a fearless environment for the employees to report any of the below instances.

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these.
- Manipulation of company data/records
- Wastage/misappropriation of company funds/assets
- Breach of employee Code of Conduct/Ethics Policy or Rules

Safeguards

i. Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns

ii. Confidentiality

the Company will treat all such disclosures in a confidential and sensitive manner.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- * Complaints of malpractice will be investigated by the appropriate authority nominated by the management unless the complaint is against the department manager or is in any way related to the actions of the

department. In such cases, the complaint should be passed to the GM/VP/ Director or HRD for referral.

- * In the case of a complaint, which is any way connected with but not against the department Manager, then the Director/Managing Director will nominate a Senior Manager to act as the alternative investigating officer.
- * Complaints against the department /functions should be passed to the Director/MD who will nominate an appropriate investigating officer.
- * The complainant has the right to bypass the line management structure and take their complaint direct to the MD/ Directors, if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.
- * If the complainant may also opt/ choice a channel for addressing the issue by emailing to **grievance@veerometals.com** or through the grievance register/drop box available in security office.

If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Investigating Procedure

The investigating officer should follow these steps:

- * Full details and clarifications of the complaint should be obtained.
- * The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by any other representative at any future interview or hearing held under the provision of these procedures.
- * The investigating officer should consider the involvement of the Company auditors and the Police at this stage MD/Director should consult with the Managing Director/ Director's
- * The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies. A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Managing Director/ Director's as appropriate.
- The Managing Director/ Director's will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

- If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.
- If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Managing Director/ Director's, or one of the designated persons described above.

For Veer-O-Metals Pvt. Ltd.,


Authorized Signatory
