

Shivalik Bimetal Controls Limited

Labour, Health & Safety Policy

POLICY STATEMENT:

We at SBCL are committed to operate lawfully with respect to Labor and Human Rights. This policy provides guidance on the company's way to respect Human Rights, Labour laws, Responsible Recruitment, and the Health and Safety of all, in accordance with laws.

OBJECTIVE:

This policy is to define SBCL's commitment to Human Rights and Ethics to ensure that there are adequate directives and correct work practices and rules applicable to our daily operations.

SCOPE AND APPLICABILITY:

This Labor and Human Rights Policy apply to all Employees (direct, indirect, Fixed-Term Employees, Contract Workers and migrant workers) Entities, Contractors, and Suppliers of SBCL and its subsidiaries.

RESPONSIBILITY:

SBCL's management shall be responsible for fulfilling this commitment by providing direction to attain compliance with all applicable Industrial & Labor Laws and Standards.

Human Resources Department shall be SBCL's designated representative for Labor and Human Rights policies and shall be responsible for assuring and facilitating compliance with Labor Laws, Regulations, Codes, Standards, and Management systems. The Human Resources Department will work with the appropriate departments to:

- Identify, monitor, and understand applicable laws and standards.
- Identify and assess labor laws and practices and risks associated with SBCL's operations and then develop and implement appropriate procedures to manage identified risks.
- Establish objectives and perform a periodic assessment to assess the achievement of objectives,
- Communicate policies and practices to stakeholders.
- Conduct periodic self-evaluations and maintain appropriate documents and records.
- Commit to provide periodical communications, training, and support to promote this Policy to respective stakeholders.

SBCL shall be guided by the following General and Specific Provisions:

a) All members associated with working for Shivalik Bimetal Controls Limited are required to report any actual, suspected, or potential violations of all Company policies, including this Labour and Human Rights Policy. Failure to do so may lead to the exercise of disciplinary action, up to and including termination of employment or contractual relationship.

b) SBCL shall make available sufficient resources to give effect to its commitment to continuous improvements of working conditions and management of Labour risks in all its operations irrespective of location.

- **Health, Safety & Security:**

SBCL shall set up or use an Occupational Health & Safety Management System (in line with ISO 45001:2018) to provide a safe and healthy working environment to its employees. This includes providing personal protective equipment (PPE) and take reasonable precautionary measures/steps to prevent accidents, injuries, and occupational diseases. This also includes prevention against physical, or verbal violence originating in internal or external threats.

Employees shall be provided training and educated on health, hygiene, and safety issues regularly.

SBCL provides its employees with access to medical coverage and minimum standards of life assurance coverage as applicable.

SBCL strives to provide secure working conditions in the workplace for the employees.

SBCL respects the rights of communities by identifying, preventing, and mitigating the impacts on the local environment and way of life.

- **Working Hours, Overtime & Leaves:**

SBCL shall comply with the maximum number of working hours laid down in applicable laws and industry standards. In any event, personnel shall not, on a regular basis, be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period.

To consider its employees' overall well-being, SBCL has defined leaves for all irrespective of Gender, Caste, Religion, and Creed... to meet the Social, Mental and physical needs of employees to maintain an effective Work-life balance.

SBCL shall ensure that overtime work, beyond maximum working hours, does not exceed the limit defined under the Occupational Safety, Health and Working Conditions Code, 2020 and Rules. The same shall be paid at the rate defined as per law.

- **Wages and Benefits:**

Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

In compliance with Labor laws, workers shall be compensated for overtime at the rate of twice their ordinary rate of wages.

We shall strive to provide **living wages** as defined/identified to facilitate the standard of living for all our employees. A living wage can be more/ less than the concept of minimum wage. Such a wage is determined keeping in view the national income and paying capacity of the industrial sector.

Information on wages and benefits shall be communicated clearly and regularly to each employee.

- **Responsible Recruitment:**

Our Responsible Recruitment Guiding Principles are in alignment with the ILO authored General principles and operational guidelines for fair recruitment:

- **Law:** Recruitment should respect the applicable national laws, regulations, employment contracts, and applicable collective agreements of Countries / States of origin, transit, and destination.

- **Recruitment agencies:** In the absence of direct recruitment, workers must be hired through ethically compliant labor brokers and recruitment agencies. We have a formal policy and due diligence process in place for vetting recruitment agencies responsible for the labor supply.

- **Fees:** No recruitment fees or related costs should be charged to, or otherwise borne by, workers/ Employees.

- **Contracts:** The terms and conditions of employment should be through written contracts in accordance with national laws, regulations, employment contracts, and applicable collective agreements. They should be clear and transparent, and in a language that the worker can understand. Workers' agreements to the terms and conditions of recruitment and employment should be voluntary and free from deception or coercion.

- **Access:** The freedom of workers to move within a country or to leave a country should be respected. Workers' identity documents such as passports, land title deeds, diplomas, employment contracts, and so on should not be confiscated, destroyed or retained.

- **Return:** Workers should be free to terminate their employment and, in the case of migrant workers, to return to their country. Migrant workers should not require the employer's or recruiter's permission to change employers in the host country on completion of their first contract or after two years, whichever is less.

- At all times workers should have access to free, comprehensive, and accurate information regarding their rights and the safe and healthy working and living conditions of their employment.

- **Child Labor Avoidance:**

Child labor is not to be used in any stage of manufacturing. A child who has not completed his 18 years shall not be allowed or engaged in or support employment in SBCL

- **Forced Labor Avoidance:**

SBCL shall not engage in or support the use of forced labor or bonded labor directly or indirectly, nor shall any employee be required to deposit original identity papers when commencing employment with SBCL

- **Freely Chosen Employment:**

Forced, bonded, or indentured labor, involuntary prison labor, and slavery or trafficking of persons, shall not be used. This includes transporting, recruiting, transferring, or receiving vulnerable persons by means

of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to terminate their employment as per rules governing employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

- **Human Treatment:**

There is to be no harsh and inhuman treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated.

- **Non-Discrimination:**

SBCL is committed to a workforce free of harassment and unlawful discrimination. SBCL shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, religion, political affiliation, or marital status in hiring and in employment practices such as promotions and rewards.

- **Freedom of Association:**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with labor laws shall be respected. Workers shall be allowed to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment.

- **Development of Competencies and Employability:**

SBCL is committed to its employees to ensure the development of competencies and employability.

SBCL provides regular training on topics that it finds relevant to the business and to the function of the employee and his/her expected behavior as a professional. SBCL shall cover at least 10 % of employees YOY through refresher training.

GREIVANCE AND REMIDIATION:

The Policy's implementation and adherence must be supported by grievance and remediation mechanisms.

- The company's Grievance Redressal Mechanism must be followed by any employee who has identified or has been made aware of a potential violation of this Policy.
- The violation may involve SBCL employees or one of its business partners. Each case should be reported by email or by phone and will be managed with the highest level of seriousness by the company's Ethics Committee. The Ethics Committee commits to protecting the identity of any individual using this grievance mechanism in good faith.



Business Partners mean contract workers, suppliers' workers, customers' workers, local communities, and end-users of our products & services.

- In situations where SBCL has caused or contributed to a negative impact, the company commits to provide or help provide a remedy to those harmed. The company's Ethics Committee ensures that people who were impacted receive an effective remedy.

All employees are invited to promote and enhance this Policy to other employees and stakeholders.

REVIEW

SBCL shall review the policy as and when any changes are to be incorporated in the policy due to change in applicable law.

Note: This policy was reviewed and revised by the Board of Directors of the Company at its meeting held on February 5th, 2026.