

HUMAN RIGHTS CHARTER

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CHILD LABOUR PROHIBITION POLICY

1. Policy Statement

Sungwoo Hitech India Pvt Ltd is committed to upholding the rights and dignity of all individuals, especially children. We strictly prohibit the employment or engagement of children under the legal working age in any part of our operations, including third-party service providers and supply chain partners. This commitment extends to all our stakeholders, including contractors, vendors, suppliers, and community partners.

2. Legal Framework

The policy is aligned with the following legislation and international standards:

- **Child Labour (Prohibition and Regulation) Act, 1986** (Amended in 2016)
- **Factories Act, 1948**
- **The Right of Children to Free and Compulsory Education Act, 2009**
- **UN Convention on the Rights of the Child (UNCRC)**
- **ILO Convention No. 138 & No. 182**

3. Definitions

- **Child:** Any person below the age of 18 years.
- **Adolescent:** Any person between the ages of 18 years.
- **Hazardous Work:** Any work that could jeopardize the health, safety, or morals of children or adolescents.

4. Scope

The policy applies to:

- All employees (permanent, temporary, apprentice, trainee)
- All contract workers and third-party personnel
- Suppliers, vendors, consultants, and sub-contractors
- External stakeholders including community partners, project collaborators

5. Policy Guidelines

5.1 Zero Tolerance for Child Labour

- No child under the age of 18 will be employed in any capacity.
- Adolescents 18 years may only be employed under strict compliance with applicable labour laws and **not in hazardous conditions**.

5.2 Age Verification Procedures

To ensure compliance:

- Obtain a **self-declaration form** from applicants regarding their age.
- Verify age using government-issued documents such as Birth Certificate, Aadhaar, PAN, or School Leaving Certificate.
- Maintain records securely in employee files.
- Third-party contractors must submit an annual declaration confirming compliance.

5.3 Supplier & Vendor Compliance

- All contracts with suppliers and vendors must include a **Child Labour Compliance Clause**.
- Periodic audits and inspections will be conducted on vendors' facilities.
- Immediate termination of contract if any child labour violation is detected.

5.4 Monitoring and Implementation

- HR Department is responsible for compliance, monitoring, and reporting.
- Surprise audits and inspections will be conducted by the Internal Audit Team.

5.5 Training and Awareness

- Induction training for all Hiring staff and vendors includes awareness on child labour laws.
- Contractors and vendors receive training materials and orientation.
- Training rosters and attendance sheets to be maintained by HR.

5.6 Grievance Mechanism

- Any suspicion or report of child labour can be raised through the company's grievance mechanism.
- Anonymous complaints are also permitted.
- Reported cases will be investigated immediately, and action taken as per company policy.

6. Roles and Responsibilities

Role	Responsibility
HR Department	Verification, awareness, audits, reporting
Procurement Dept.	Enforce vendor/supplier compliance
Contractors & Suppliers	Submit compliance declarations, follow screening process
Employees & Community	Report violations, participate in awareness programs

7. Non-Compliance and Disciplinary Action

- Any violation will lead to **disciplinary action**, including termination of employment or cancellation of contract.

8. Policy Review

The policy shall be reviewed **annually** or as required by changes in legislation. Updates will be communicated to all relevant parties and published on the company's notice boards and website.

HUMANE TREATMENT AND WORKPLACE HARASSMENT PREVENTION POLICY

1. Policy Objective

To establish a safe, respectful, and inclusive work environment where **dignity, equality, and human rights** are protected and promoted. The company strictly prohibits any form of **torture, inhuman or degrading treatment, and workplace harassment**, including sexual harassment, bullying, or emotional abuse.

2. Legal and Ethical Framework

The policy is based on:

- **Indian Constitution – Article 21 (Right to Life and Dignity)**
- **Factories Act, 1948**
- **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 – POSH Act**
- **International Labour Organization (ILO) Conventions**
- **Universal Declaration of Human Rights (UDHR)**

3. Scope and Applicability

The policy is applicable to:

- All full-time, part-time, and temporary employees
- Interns, apprentices, and trainees
- Contract and outsourced workers
- Visitors, clients, vendors, and stakeholders operating within/outside company premises

4. Policy Principles

4.1 Humane Treatment

- Every individual shall be treated with dignity and respect.
- No employee, contractor, or visitor shall be subjected to any **inhuman, threatening, degrading, or humiliating treatment**.

- Management and supervisors shall foster a culture of empathy, cooperation, and fair discipline.

4.2 Prevention of Torture and Coercion

- The company has **zero tolerance** for any physical or psychological torture, punishment, or intimidation.
- Disciplinary actions must follow due process, and coercive measures such as forced overtime, threats of firing, body Shaming or social shaming are strictly banned.

4.3 Workplace Harassment

Workplace harassment includes but is not limited to:

- **Verbal:** Abuse, insults, sexist remarks, offensive jokes
- **Physical:** Unwelcome touching, hitting, or intimidation
- **Psychological:** Bullying, exclusion, constant criticism, threats
- **Sexual:** Any unwelcome sexual advances, gestures, or requests

Sexual Harassment is addressed under the **POSH Act, 2013** and includes:

- Physical contact and advances
- Demand or request for sexual favours
- Showing pornography
- Making sexually coloured remarks

5. Grievance and Reporting Procedure

- Victims or witnesses of harassment or abuse can report via:
 - ❖ **Internal Complaints Committee (ICC)** – for sexual harassment
 - ❖ **Grievance Redressal Committee (GRC)** – for other concerns
 - ❖ **Anonymous Complaints Box**
 - ❖ **Email to HR Department**
- Complaints will be addressed **confidentially** and without retaliation.

- Resolution will occur within **15–30 working days**, as per the law.

6. Awareness & Training

- **Annual sensitization sessions** for all employees on respectful behavior and anti-harassment policies
- **Special POSH training** for ICC members and female employees
- **Contractors and vendors** will receive orientation on humane treatment obligations

7. Disciplinary Action for Violation

Any individual found violating this policy shall face:

- Written warning or suspension
- Termination of employment or contract
- Legal escalation to local authorities in severe cases

8. External Stakeholder Expectations

All third-party vendors, suppliers, and business partners are required to:

- Sign a declaration of compliance with the company's **Humane Treatment and Anti-Harassment Policy**
- Provide safe and respectful working conditions for their employees
- Cooperate with audits or investigations as required

9. Monitoring and Review

- This policy will be reviewed annually by HR and Legal teams.
- Updates will be communicated via circulars, notice boards, and employee handbooks.

FORCED LABOUR PROHIBITION POLICY

1. Policy Statement

Sungwoo Hitech India Pvt Ltd strictly prohibits all forms of **forced, bonded, indentured, or involuntary labour**, including work without informed consent or fair compensation. The company is committed to ensuring that all workers, whether direct or through third parties, are employed **freely, fairly, and voluntarily**.

We adhere to the **Fundamental Principles and Rights at Work** defined by the **International Labour Organization (ILO)** and relevant Indian laws.

2. Legal and Regulatory References

This policy is guided by the following national laws, constitutional provisions, and international conventions:

- **Article 23 of the Constitution of India:** Prohibits **traffic in human beings, begar** (forced labour), and other similar forms of forced labour. Any contravention is a punishable offence.
- **Bonded Labour System (Abolition) Act, 1976:** Abolishes bonded labour and prohibits all forms of debt-based coercion.
- **Indian Contract Act, 1872:** Invalidates any contract made under coercion or without free consent.
- **Factories Act, 1948:** Regulates working hours, conditions, and safety of workers.
- **Inter-State Migrant Workmen Act, 1979:** Provides protection and welfare to migrant workers.
- **ILO Convention No. 29 (Forced Labour) & No. 105 (Abolition of Forced Labour):** Ratified by India.
- **Universal Declaration of Human Rights – Article 4:** Prohibits slavery and forced labour globally.

3. Scope

The policy applies to:

- All permanent, temporary, casual, contract, and outsourced employees
- Trainees and apprentices
- Workers engaged through recruitment agencies
- Contractors, vendors, and third-party service providers
- External stakeholders operating under Sungwoo Hitech India Pvt Ltd's control or supply chain

4. Prohibited Practices

4.1 Bonded Labour

- No employee shall be made to work to pay off a debt, loan, advance, or obligation.
- No wage deductions, advances, or loans shall tie the worker to the job.

4.2 Unpaid or Underpaid Work

- All work must be performed **voluntarily** with a valid employment agreement and **fair compensation**.
- Employees must receive wages equal to or greater than **minimum wages** as per **State Labour Department** guidelines.

4.3 Ban on Recruitment Fees

- Workers shall **not pay any recruitment fees** to obtain or retain their employment.
- All hiring costs (agency fee, placement charge, verification cost) shall be borne by **the company or approved agency**, not the worker.

4.4 Coerced Labour

- No form of physical force, mental pressure, threat of penalty, withholding of ID documents, or restriction on movement is permitted.
- Overtime must be **voluntary**, not forced.

4.5 Confiscation of Personal Documents

- Workers' **identity documents (e.g., Aadhaar, PAN, Passport)** shall not be held by the company or contractor without written consent and access rights.

4.6 No Work Without Consent

- Employment contracts must be in a language understood by the worker and signed voluntarily.
- No worker will be transferred, promoted, or relocated without consent.

5. Recruitment and Employment Standards

- All job offers and conditions of employment must be **clear, documented, and communicated in advance**.
- Workers shall be provided with **appointment letters**, salary structures, and job descriptions.

- Recruitment agencies must be **licensed**, audited, and approved by the HR department.
- Contractors and vendors must sign a **forced labour compliance declaration**.

6. Training and Awareness

- Awareness training for HR, line managers, contractors, and security personnel on forced labour risks and prevention.
- Display of posters and materials in local languages in high-visibility areas.
- Vendors and suppliers shall receive annual orientation.

7. Grievance and Redressal Mechanism

- Workers can report any suspicion of forced labour via:
 - ❖ **Compliant Box**
 - ❖ **Grievance Redressal Committee (GRC)**
 - ❖ **Email (Anonymous)**
- All complaints will be investigated confidentially and resolved within **15 working days**.
- Whistleblowers are protected from retaliation.

8. Monitoring and Compliance

- Periodic audits of payroll records, attendance, employment contracts, and worker interviews.
- Contractors and recruitment agencies are subject to **annual audits** and surprise inspections.
- Violations may lead to termination of contract and reporting to **local labour authorities**.

9. Disciplinary Action for Violation

- Any confirmed case of forced labour or coercion will lead to:
 - ❖ **Immediate termination** of employment or business relationship
 - ❖ **Legal action** under the Bonded Labour Act and Labour Laws
 - ❖ **Blacklisting** of the violating vendor/agency

10. Policy Review

The policy shall be reviewed **annually**, or sooner if there is a significant change in laws or company operations.

POLICY ON PROHIBITION OF DISCRIMINATION & FREEDOM OF ASSOCIATION

1. Purpose

To affirm the company's commitment to providing a **discrimination-free workplace** and to uphold every worker's right to **freely associate**, form, or join workers' organizations or committees, including trade unions, without fear of retaliation.

2. Legal Framework

The policy is aligned with:

- **Indian Constitution – Articles 14, 15, 16, 19, and 23**
- **The Trade Unions Act, 1926**
- **The Industrial Disputes Act, 1947**
- **Factories Act, 1948**
- **ILO Conventions 87 & 98 (Freedom of Association & Collective Bargaining)**
- **Human Rights Charter – UN Guiding Principles on Business and Human Rights**

3. Scope of Applicability

The policy applies to:

- All permanent, temporary, contract, or third-party employees
- Apprentices and trainees
- Contractors, vendors, and suppliers engaged with the company

4. Policy Statements

4.1 Prohibition of Discrimination

- No worker shall face discrimination based on **caste, religion, race, gender, age, disability, sexual orientation, marital status, political opinion, or trade union membership**.
- Equal opportunities shall be provided in **hiring, promotion, compensation, and training**.
- All employment-related decisions shall be based solely on **merit, qualifications, and performance**.

4.2 Freedom of Association

- Workers have the **right to freely form, join, or not join**:

- ❖ Workers' groups
- ❖ Trade unions
- ❖ Committees or welfare bodies

➤ Workers can collectively discuss workplace concerns and negotiate with management.

4.3 Non-Retaliation Clause

- No employee shall be punished, terminated, transferred, demoted, or harassed for:
- ❖ Participating in legally recognized workers' associations
 - ❖ Filing or supporting grievances
 - ❖ Engaging in peaceful assembly or collective discussions

5. Internal Committees & Representation

- Employees may elect representatives for:
- ❖ Grievance Redressal Committees
 - ❖ POSH Internal Complaints Committee
 - ❖ Safety and Welfare Committees
- The company encourages dialogue between **worker representatives and management.**

6. Stakeholder Expectations

- Contractors, suppliers, and external stakeholders must respect workers' rights to association and non-discrimination.
- Non-compliance may result in contract termination or blacklisting.

7. Awareness & Training

- Training on **equal opportunity, workplace rights, and grievance processes** is provided annually.
- All employees will sign a declaration of understanding this policy at the time of joining.

8. Grievance Redressal

- Workers may report incidents of discrimination or restriction of association to:

❖ **Grievance Redressal Committee (GRC)**

❖ **HR Department**

❖ **Complaint box or Official grievance email (Complants @ Swhi.in)**

➤ Investigations will be completed within **15 working days**. Retaliation against complainants is strictly prohibited.

9. Monitoring and Review

- HR will review this policy annually and report compliance to management.
- Violations will be documented and acted upon as per company disciplinary procedures.

LIVING WAGE & EMPLOYEE WELFARE BENEFITS POLICY

1. Purpose

To ensure that all employees receive a **fair, decent, and living wage** that exceeds statutory minimum wages, and to provide **comprehensive welfare benefits** that support the well-being, dignity, and productivity of all workers.

2. Scope

The policy applies to:

- Permanent and temporary employees
- Contract labour
- Apprentices and trainees
- Workers engaged through vendors and service providers

3. Legal Framework

The policy is in line with:

- **Minimum Wages Act, 1948**
- **Payment of Wages Act, 1936**
- **Factories Act, 1948**
- **ILO Convention 131 (Minimum Wage Fixing)**
- **Indian Constitution – Directive Principles (Article 43)**

4. Living Wage Commitment

Sungwoo Hitech India Pvt Ltd commits to:

- Paying **wages not less than mandated minimum wages** for all job categories.
- Ensuring wages meet the cost of living, including food, shelter, transport, health care, children's education, and savings.
- Conducting **annual reviews** of wage structures to remain competitive and fair.

5. Employee Welfare Benefits

The company provides the following **non-monetary benefits** to enhance employee welfare:

5.1 Free or Subsidized Transport

- Company-arranged transport facility for pick-up and drop from approved locations.
- Special transport arrangements for female employees (where applicable).

5.2 Canteen Facility

- Nutritious and hygienic meals provided at subsidized rates or free.
- Vegetarian and non-vegetarian foods.
- Clean drinking water is made available.

5.3 Uniform & Safety Equipment

- **3 sets of uniforms** provided to eligible employees annually, free of cost.
- **4 T-shirts** provided annually, based on department/line requirements.
- Provision of **Personal Protective Equipment (PPE)** such as safety shoes, gloves, goggles, and masks as per job role.

6. Equal Treatment

- All eligible employees shall receive equal access to these benefits, regardless of gender, caste, religion, or employment type.
- Outsourced or contract staff working full-time on-site shall also be extended basic welfare benefits.

7. Monitoring and Compliance

- **HR Department** will conduct wage audits and employee feedback surveys.
- Contractors and vendors must submit proof of compliance with minimum and living wage guidelines.
- Non-compliance by vendors or agencies will lead to corrective action or termination.

8. Grievance Redressal

- Employees can raise wage or welfare-related grievances to:
 - ❖ HR Department
 - ❖ Grievance Redressal Committee

❖ Anonymous /complaint box

Complaints shall be resolved within **15 working days**.

9. Review and Update

- The policy will be reviewed **annually** or as per changes in law, industry standards, or employee needs.

LOCAL AND INDIGENOUS PEOPLE RIGHTS POLICY

1. Purpose

The policy affirms Sungwoo Hitech India Pvt Ltd's commitment to **respecting the rights, traditions, culture, and livelihoods of local and indigenous communities**, in Kattrambakkam village and especially those impacted by industrial development or land acquisition.

2. Legal Framework

The policy complies with the following:

- **The Panchayat (Extension to Scheduled Areas) Act, 1996 (PESA)**
- **The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 (FRA)**
- **SIPCOT Guidelines on Land Acquisition & Community Engagement**
- **ILO Convention 169** (Indigenous and Tribal Peoples)
- **Indian Constitution – Article 244, Schedule V & VI**

3. Policy Commitments

3.1 Recognition of Indigenous Rights

- The company respects the **land, forest, and cultural rights** of local and indigenous communities.
- No operations shall be carried out on land that has been acquired through coercion or without due **consultation and consent** from local governing bodies (e.g., Gram Sabha).

3.2 Free, Prior, and Informed Consent (FPIC)

- Community engagement will be done **transparently and in local languages**.

- Information related to new projects, land use, environmental impact, and employment will be shared before execution.
- FPIC will be obtained before any community-affecting project is initiated.

3.3 Livelihood Protection

- The company supports alternate employment opportunities for impacted communities, such as:
 - ❖ Direct employment
 - ❖ Skill development programs
 - ❖ Support for small businesses or self-employment

3.4 Inclusion in CSR and Development Plans

- Local and tribal communities are prioritized in:
 - ❖ **CSR initiatives** (education, health, infrastructure)
 - ❖ **Job opportunities** under employment schemes
 - ❖ **Youth training programs** through ITI, skill centres

3.5 Non-Discrimination

- Indigenous people engaged by the company will be treated **fairly and equally**, without any discrimination in wages, work conditions, or benefits.

4. Stakeholder & Grievance Engagement

- The company shall maintain a **Community Grievance Mechanism** for local population issues related to:
 - ❖ Land disputes
 - ❖ Environmental impact
 - ❖ Noise, pollution, or traffic
 - ❖ Employment or community relations
- Complaints will be addressed through:
 - ❖ Gram Sabha/Panchayat consultation

❖ HR & CSR department follow-up

❖ Local liaison officers

5. Monitoring & Compliance

- The **CSR and HR teams** will jointly review this policy implementation.
- Periodic audits and **community feedback surveys** will ensure adherence.
- Contractors, vendors, and external agencies must also comply with this policy.

GRIEVANCE MECHANISM POLICY FOR HUMAN RIGHTS & ENVIRONMENTAL ISSUES

1. Purpose

To provide a **transparent, accessible, and fair mechanism** for addressing grievances related to **human rights violations, environmental impact, and community concerns** involving company operations or stakeholders.

2. Coverage

This mechanism is open to:

- All employees and contract workers
- Local communities and Panchayats
- Suppliers, vendors, contractors, service partners
- Government authorities and NGOs
- Environmental and social activists with direct concern

3. Key Areas of Grievances Covered

Grievances may include but are not limited to:

- **Child labour, forced labour, bonded labour**
- **Discrimination, workplace harassment, human treatment**
- **Violation of freedom of association or living wage commitments**
- **Environmental concerns** – pollution, waste, emissions, groundwater usage
- **Land acquisition, displacement, loss of livelihood**
- **Violation of indigenous rights**
- **Contractor/vendor misconduct**
- **Industrial disputes** as per Industrial Disputes Act, 1947
- **POSH Act, Factories Act, 1948, Panchayat Act, SIPCOT rules compliance**

4. Grievance Channels Available

Sungwoo Hitech India Pvt Ltd provides **multiple access points** for submitting grievances:

4.1 For Internal Employees

- HR Helpdesk
- Complaints through phone calls/ Email
- Internal grievance committee
- POSH Committee (for sexual harassment)
- Worker Committee representation

4.2 For External Stakeholders

- **Community Liaison Officer (CLO):** HR Head : Mobil : 9940628672
- **CSR Helpline Number:** 044 - 67192500
- **Email ID:** anees@swhi.in
- SIPCOT or Panchayat Office Phone No : 9840612122

5. Grievance Handling Process

Step	Action	Timeline
1.	Grievance Submission	Immediate
2.	Acknowledgment to complainant	Within 3 working days
3.	Preliminary Assessment	Within 7 working days
4.	Full Investigation (if needed)	Within 15 working days
5.	Resolution Communication	Within 20 working days
6.	Escalation to Top Management / Legal	If unresolved

6. Confidentiality & Non-Retaliation

- All grievances will be handled with **strict confidentiality**.
- Whistleblowers and complainants will be protected from **retaliation or victimization**.
- Anonymous complaints will also be considered if evidence is sufficient.

7. Monitoring and Reporting

- HR and CSR team will maintain a **Grievance Register**.
- Quarterly grievance summaries will be reviewed by the **Internal Compliance Committee**.
- Complaint summaries will be disclosed in annual HR / CSR report.

➤ **8. Awareness & Communication**

- Policy will be displayed in English, Tamil, and Hindi at factory sites and village notice boards.
- Regular training will be conducted for workers, vendors, and community leaders on how to raise grievances/Complaints.

9. Escalation to Legal Authorities

If grievances are not resolved internally or involve legal violations, they may be escalated to:

- Labour Commissioner
- Pollution Control Board
- District Collector
- SIPCOT Authority
- Women's Commission or Human Rights Commission