Classification: Public

Policy against Human Trafficking and Child Labour

Adoption Date and Effective Date : March 25, 2024

1.0 OBJECTIVE:

Carborundum Universal Limited ('CUMI') is committed to a work environment that is free from human trafficking and slavery, which for purposes of this Policy, includes forced labor and unlawful child labor. CUMI will not tolerate human trafficking or slavery in any form in any part of the organization.

This policy is consistent with CUMI's Code of Conduct and its core values to protect and advance human dignity and human rights in its business practices.

Each employee of the Company has a duty to comply with the provisions of this Policy. If any employee of the Company has any Knowledge of employment of any child in the Company he/she shall immediately report this to the Company.

All contractors, sub-contractors, vendors, suppliers, partners and others through whom CUMI conducts business must abide by the CUMI's code of conduct and the Human trafficking and Child Labour policy published in the website of the Company. Prior to entering into any engagement with any agent, contractor, or supplier, all employees are required to ensure that such person/entity uphold the same policy/ standards in the form as stipulated by the Company.

All the employees, contractors, sub-contractors, vendors, suppliers, partners and others through whom CUMI conducts business are encouraged to avoid complicity in any practice that constitutes trafficking in persons or slavery.

2.0 EFFECTIVE DATE:

This Policy shall be implemented with effect from 1st February 2024.

3.0 APPLICABILITY:

This Policy shall be applicable to CUMI including its subsidiary companies, associate companies and joint ventures unless these companies have a similar policy of their own.

4.0 POLICY STATEMENT:

CUMI forbids trafficking in persons, child labour and slavery. CUMI employees, contractors, sub-contractors, vendors, suppliers, partners and others through whom CUMI conducts business must not engage in any practice that constitutes human trafficking or child labour or slavery. This includes, but is not limited to, the following activities:

4.1 Engaging in any form of trafficking in persons;

4.2 Using forced or compulsory labor in the performance of any work involuntarily or under a threat of penalty.

4.3 Unlawfully destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses or other personal documents, regardless of issuing authority.

4.4 Involving in misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose basic information in a format and language accessible to the potential candidate, making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including but not limited to wages and fringe benefits, the location and hours of work, the living conditions, housing and associated costs (if provided by CUMI), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;

4.5 If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

4.6 Not to employ workers below the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements.

CUMI is committed, in ensuring a workplace, across all its locations it has operations, free from any kind of discrimination, harassment and/or any other form of human abuse.

CUMI prohibits retaliation against anyone who files a complaint or reports a suspected violation of this Policy. Anyone who violates this Policy will be subject to appropriate action by CUMI, including, but not limited to, disclosure of the violation to Government officials, when required by law or contract, and termination.

Any suspected violation should be reported immediately Head of Human Resources.