

MOREPEN LABORATORIES LIMITED

CIN: L24231HP1984PLC006028

Registered Office: Village Morepen, Nalagarh Road, Near Baddi Distt. Solan, Himachal Pradesh – 173 205

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Document No.: CHILD-POL-001 | Rev Date: 01 Dec 2024 | Revision No.: 02

Child Labour, Forced Labour and Human Trafficking Policy

1. Purpose and Commitment

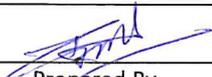
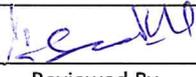
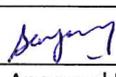
The Company is committed to upholding fundamental human rights and ensuring that no form of child labour, forced labour, bonded labour, or human trafficking is practiced in any of its operations, business relationships, or supply chains. This policy reflects the Company's zero-tolerance stance against modern slavery in all its forms and aligns with the Child Labour (Prohibition and Regulation) Act, 1986, the Bonded Labour System (Abolition) Act, 1976, the Immoral Traffic (Prevention) Act, 1956, Sections 370 and 370A of the Indian Penal Code, 1860, the Factories Act, 1948, the Minimum Wages Act, 1948, relevant ILO Conventions (Convention 138, Convention 182, Convention 29, and Convention 105), the United Nations Convention on the Rights of the Child, the UN Trafficking in Persons Protocol, and SA 8000:2014 Social Accountability Standard. For SEBI-listed entities, this policy also aligns with Business Responsibility and Sustainability Reporting (BRSR) requirements under Principle 5 (Human Rights). This policy provides guidelines for remediation, rehabilitation, and reporting when violations are identified.

2. Scope

This policy applies to all employees including permanent, temporary, fixed-term, contractual, probationary, trainees, apprentices, interns, consultants, and workers engaged under any employment arrangement; all directors and officers of the Company; suppliers, contractors, sub-contractors, vendors, business partners, agents, and intermediaries engaged with or on behalf of the Company; all facilities, manufacturing units, offices, warehouses, and operations under the Company's direct or indirect control, including those operated by third parties on behalf of the Company; and the extended workforce and labor supply chain, including home workers, migrant workers, contract labor, and workers employed through labor intermediaries.

3. Definitions

A "child" means any person below the age of 18 years. For the purpose of hazardous work prohibition, "child" also means any person below 14 years of age as per the Child Labour (Prohibition and Regulation) Act, 1986. A "young worker" means any person between the ages of 15 and 18 years (or 14 and 18 years in certain cases as permitted by law). "Child labour" means the employment of any child below the minimum legal working age in any occupation or process, or the engagement of any child in work that is likely to be hazardous, harmful to their health, safety, or morals, or that interferes with their education and development. "Forced labour" means any work or service which is extracted from any person under the menace of any penalty (including physical or mental coercion, debt bondage, threat of violence, withholding of wages or identity documents) and for which the person has not offered himself/herself voluntarily. "Bonded labour" means the system of forced, or partly forced, labour under which a debtor enters, or has, or is presumed to have entered, into an agreement with the creditor to forfeit freedom of employment, right to move freely throughout India, and right to appropriate wages or sell products at market value. "Human

		
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trafficking" means the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or giving/receiving of payments or benefits to achieve consent of a person having control over another person, for the purpose of exploitation. **"Modern slavery"** is an umbrella term encompassing child labour, forced labour, bonded labour, human trafficking, servitude, and slavery-like practices.

4. Policy Statements

4.1 Prohibition of Child Labour

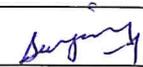
The Company shall not employ, engage, or support the use of child labour. No person under the age of 18 years shall be employed in any of the Company's operations, facilities, or through any business relationship. The Company shall not procure goods or services from any supplier, contractor, or business partner that employs child labour. Mandatory age verification through valid government-issued documents (birth certificate, school leaving certificate, Aadhaar card, PAN card, voter ID, passport, driving license, or medical certification) shall be conducted during recruitment for all workers and employees. All measures to prevent and remediate child labour shall be implemented taking the child's best interests into account, ensuring their safety, health, education, and development.

4.2 Young Workers (Ages 15-18)

Where permitted by applicable law, young workers (persons between 15-18 years or 14-18 years as applicable) may be employed only in non-hazardous occupations and processes. Young workers shall not be employed during night hours (between 7 PM and 6 AM), shall not perform overtime work, and shall not work in or near areas involving hazardous chemicals, heavy machinery, or processes listed under the Child Labour Act. Combined time for school, work, and transportation shall not exceed 10 hours per day. Young workers shall not work more than 8 hours per day or 6 hours per day if attending school. At least 2 hours of compulsory education per day must be ensured. Annual health checkups and medical monitoring shall be conducted, and financial and educational support shall be provided as necessary.

4.3 Prohibition of Forced and Bonded Labour

All employment shall be based on voluntary consent. Workers shall have the freedom to resign with reasonable notice as per employment terms or applicable law. Workers shall not be required to lodge deposits, surrender identity papers (passports, Aadhaar cards, certificates, licenses), or any personal documents to the employer or any intermediary. All original identity documents shall remain with the worker. The Company shall not provide loans or advances that tie workers to employment or create conditions of debt bondage. Any bonded debt owed by workers stands extinguished as per the Bonded Labour System (Abolition) Act, 1976. All overtime work shall be strictly voluntary, and workers shall not face penalties, threats, intimidation, loss of benefits, or termination for refusing overtime work. Workers shall receive wages as per or above the Minimum Wages Act, 1948 or industry benchmarks, whichever is higher, and wages shall be paid regularly and on time without unlawful deductions. Deductions from wages as a disciplinary measure are prohibited, and only deductions permitted by law (PF, ESI, income tax) or with express written consent of the worker shall be made. Workers shall have complete freedom of movement within and

		
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outside the workplace, and no physical confinement or restriction on freedom shall be imposed. The Company shall not engage prison labour or any persons subjected to trafficking or modern slavery.

4.4 Prohibition of Human Trafficking

The Company has a zero-tolerance policy towards human trafficking in all forms, including trafficking for forced labour, sexual exploitation, organ removal, or any other form of exploitation. The Company shall not recruit, transport, harbour, transfer, or receive any person through threat, force, coercion, abduction, fraud, deception, abuse of power, or inducement for the purpose of exploitation. The Company shall not knowingly engage, employ, or benefit from the services of any trafficked person for any form of labour or exploitation. The Company shall create awareness among employees, suppliers, contractors, and communities about human trafficking, its indicators, and prevention measures.

5. Recruitment Practices

Recruitment shall be transparent, fair, and based solely on qualifications, skills, and suitability for the role. Job advertisements shall clearly state terms of employment, working conditions, wages, and benefits. Recruitment fees, charges, or deposits shall not be borne by workers or job seekers. Labor brokers, recruitment agencies, and contractors shall be licensed and must comply with this policy. All candidates shall provide at least one valid government-issued document for age verification during recruitment, including birth certificate issued by municipal corporation or local government authority, school leaving certificate or transfer certificate specifying date of birth, Aadhaar card, PAN card, voter ID card, passport, driving license, or certificate issued by ESI Medical Officer or Government Medical Officer. In case of doubt or non-availability of documents, candidates shall be referred for medical or dental age assessment. All workers shall receive written employment agreements in a language they understand, clearly stating nature and type of employment, job role and responsibilities, duration of employment, working hours, wages and benefits, leave entitlements, and resignation and termination conditions. All suppliers, contractors, sub-contractors, and business partners shall provide a written undertaking and certificate of compliance confirming they do not engage child labour, forced labour, bonded labour, or human trafficking. Suppliers shall disclose all places of production and sub-contractor locations where work is performed on behalf of the Company. The Company reserves the right to conduct unannounced audits, inspections, and verification visits to supplier and contractor premises.

6. Remediation Procedures

6.1 Child Labour Remediation

If a child (below 18 years) is found working in the Company's operations or supply chain, immediate action shall be taken within 24 hours to remove the child from the work area and ensure their safety. The child shall not be terminated or dismissed abruptly without a remediation plan. A detailed record shall be made including the child's name, age, contact details, family details, and circumstances of employment. The child shall be allocated to light, non-hazardous work (such as filing or light office tasks) until remediation is completed. Within 7 days, senior management shall investigate how the child gained employment by reviewing recruitment records and interviewing the child, parents/guardians, recruiter, and contractor if

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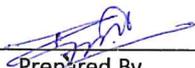
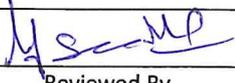
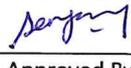
applicable. The investigation shall verify time office records and security entry logs to understand lapses in age verification. Written warning shall be issued to contractor or recruitment agency if child was supplied by them, and repeated violations shall result in termination of contract. Within 15 days, comprehensive support shall be provided including enrollment of the child in a nearby school or engagement of a private tutor if school is unavailable. Financial support shall be provided as stipend equivalent to wages to replace lost income, or by employing an adult member of the child's family to compensate for household income loss. All costs related to school fees, uniforms, books, stationery, transportation, and other education-related expenses shall be borne by the Company. As per Supreme Court directives, the Company shall contribute ₹20,000 per child to a Child Labour Welfare Fund, with interest from this fund used to provide financial assistance to the family until the child attains 18 years of age or completes education. A designated Child Welfare Officer shall monitor the child's school attendance, academic progress, and well-being through quarterly follow-up visits with the child and family. Coordination with local child welfare organizations, NGOs, and government departments shall be maintained. Training shall be conducted for HR, security, recruitment personnel, and contractors on child labour identification and prevention, and age verification processes shall be strengthened. Child labour prohibition notices shall be displayed at all entry points, factory premises, and contractor work areas.

6.2 Forced Labour and Bonded Labour Remediation

If forced labour, bonded labour, or trafficking victims are identified, all exploitative work conditions shall be ceased immediately. The victim shall be freed from any threat, coercion, confinement, or penalty, and all withheld identity documents, passports, wages, and personal belongings shall be returned immediately. The victim's safety and protection from retaliation by perpetrators shall be ensured. Full back wages for any unpaid work or unlawfully deducted amounts shall be provided. The victim shall be compensated for any abuse, harassment, physical or mental harm, or loss suffered due to involuntary work conditions. All bonded debts shall be extinguished as per Section 6 of the Bonded Labour System (Abolition) Act, 1976, with no liability to repay bonded debt. The matter shall be reported to appropriate law enforcement authorities (Labour Department, Police, Anti-Human Trafficking Units) as required by law. Safe accommodation and basic necessities (food, clothing, medical care) shall be provided or arranged. Mental health counseling, trauma support, and psychosocial services shall be arranged through qualified professionals or government-recognized agencies. The victim shall be educated about their worker rights, legal protections, and available remedies. Opportunity for dignified work with fair wages and safe working conditions shall be provided if the victim wishes to continue employment voluntarily, without coercion. Skill development, vocational training, or education programs shall be supported for long-term rehabilitation and reintegration. Coordination with specialized NGOs, Integrated Anti-Human Trafficking Units (IAHTUs), rehabilitation homes, protective homes, and government agencies shall be maintained. Disciplinary action shall be initiated against responsible managers, supervisors, contractors, or employees who perpetrated, facilitated, or were complicit in forced labour or trafficking, with possible suspension, demotion, termination of employment, and blacklisting. Contracts with suppliers, contractors, or labor intermediaries shall be terminated immediately, and criminal violations shall be reported to police with full cooperation in law enforcement investigations.

6.3 Human Trafficking Remediation

In addition to forced labour remediation measures, suspected trafficking cases shall be immediately reported to local police, State Anti-Human Trafficking Unit (AHTU), or National Human Trafficking Hotline.

		
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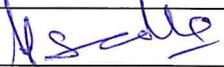
Coordination with law enforcement shall be maintained for safe rescue and protection of victims. Victims shall not be treated as offenders and shall be provided access to legal aid, interpreters, and protection from re-victimization. Protective homes, shelter homes, and specialized rehabilitation services shall be facilitated as per the Immoral Traffic (Prevention) Act, 1956 and trafficking protocols. Victims' repatriation and family reunification shall be supported if they are from other states or countries, in coordination with government authorities and international organizations. Long-term support shall be provided for education, vocational training, livelihood opportunities, health and nutrition programs, and social reintegration.

7. Reporting Mechanism

Any employee, worker, contractor, supplier, or stakeholder who suspects or becomes aware of child labour, forced labour, bonded labour, or human trafficking shall immediately report to the Head of Human Resources, Compliance Officer or Ethics Officer, Grievance Redressal Committee, or Whistleblower Helpline. Reports may be made anonymously through suggestion boxes, online portal, or third-party helpline. Reports may also be made to District Labour Officer, Police or Anti-Human Trafficking Units, National Commission for Protection of Child Rights (NCPCR) or State Commission for Protection of Child Rights (SCPCR), or Childline (1098) for child-related concerns. Acknowledgment shall be provided within 24 hours of receiving complaint. Preliminary investigation shall be conducted within 7 working days. Remediation plan implementation shall begin within 15 working days. Final report and corrective actions shall be completed within 30 days. All complaints and reports shall be treated with strict confidentiality, and the identity of whistleblowers and complainants shall be protected. No retaliation, intimidation, harassment, or adverse action shall be taken against any person who reports concerns in good faith. Retaliation against whistleblowers shall be treated as a serious violation and result in disciplinary action, including termination.

8. Monitoring, Auditing, and Due Diligence

HR and Compliance departments shall conduct periodic internal audits (at least annually) of all facilities, operations, recruitment practices, and employment records to ensure compliance with this policy. A Social Performance Team (SPT) or equivalent committee shall oversee policy implementation and monitor compliance. The Company shall conduct due diligence assessments and on-site audits of suppliers, contractors, and business partners before onboarding and periodically thereafter (at least annually). Audits shall include document verification, worker interviews, facility inspections, and review of recruitment and wage payment practices. Suppliers and contractors must provide proof of compliance including age verification records, employment agreements, wage registers, and absence of forced labour indicators. Risk assessments shall be conducted to identify operations, geographies, and supply chain segments with elevated risk of child labour, forced labour, or trafficking, with high-risk areas prioritized for enhanced monitoring, training, and remediation preparedness. Independent third-party auditors or certification bodies

		
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shall be engaged for social compliance audits (e.g., SA 8000 certification audits). The Company shall participate in industry initiatives, multi-stakeholder forums, and collaborative efforts to combat modern slavery.

9. Training and Awareness

All employees, contractors, suppliers, managers, and HR personnel shall undergo mandatory training at least once per year covering identification of child labour, forced labour, bonded labour, and human trafficking; legal obligations under Indian laws and international standards; ethical recruitment practices and age verification procedures; reporting mechanisms and whistleblower protections; remediation and victim support procedures; and worker rights and grievance redressal. Training completion certificates shall be issued and maintained. Employees shall produce training completion certificates at the end of each financial year. Training effectiveness shall be monitored through assessments, quizzes, and practical evaluations. The Company shall engage in community education programs, awareness campaigns, and partnerships with NGOs to prevent child labour and human trafficking. Scholarships, educational support, and vocational training opportunities shall be provided to children and vulnerable populations in local communities.

10. Consequences of Non-Compliance

Violations of this policy by employees, managers, or officers shall result in counseling and corrective training, written warning or reprimand, suspension without pay, demotion or transfer, termination of employment, and reporting to law enforcement authorities and legal action as applicable. Violations by suppliers, contractors, or business partners shall result in issuance of corrective action notice with timeline for compliance (typically 7 days), temporary suspension of business relationship pending corrective actions, immediate termination of contract for serious violations or repeated non-compliance, blacklisting and exclusion from future business opportunities, and reporting to relevant authorities and industry bodies. Persons found guilty of employing child labour may face imprisonment of 3 months to 1 year and/or fine of ₹10,000 to ₹20,000. Bonded labour violations may result in imprisonment up to 3 years and/or fine. Trafficking offences (IPC Section 370) may result in rigorous imprisonment of 7-10 years plus fine for basic offence, 10 years to life imprisonment plus fine for trafficking of multiple persons or one minor, 14 years to life imprisonment plus fine for trafficking of multiple minors, and life imprisonment plus fine for habitual trafficking of minors or public servant involvement. Exploitation of trafficked person (IPC Section 370A) may result in imprisonment of 3-7 years plus fine. Immoral Traffic Prevention Act violations may result in imprisonment of 7 years to life plus fine depending on severity.

11. Governance and Accountability

The Board of Directors shall have overall oversight and accountability for policy implementation. The Managing Director/CEO shall have ultimate responsibility for ensuring compliance across all operations. The Head of HR shall be responsible for day-to-day implementation, monitoring, training, and remediation coordination. The Compliance Officer/Ethics Officer shall handle policy enforcement, audits, and reporting.

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A Social Performance Team (SPT) or equivalent committee shall conduct monitoring, grievance handling, supplier audits, and continuous improvement. All Employees shall have the duty to comply with the policy and report violations. For SEBI-listed companies, child labour, forced labour, and trafficking-related complaints, cases, and remedial measures shall be disclosed in the Business Responsibility and Sustainability Report (BRSR) under Principle 5 (Human Rights) as part of the Annual Report. An annual report shall be submitted to the Board on policy implementation, audit findings, complaints received, remediation actions, and training completion. The policy shall be published on the Company's website and displayed at conspicuous locations in all facilities.

12. Policy Review and Amendment

The policy shall be reviewed annually or whenever new laws, regulations, or international standards are enacted. Continuous improvement measures shall be implemented based on audit findings, stakeholder feedback, remediation outcomes, and emerging best practices. The Company reserves the right to amend this policy at any time without assigning any reason. The utility and interpretation of the policy shall be at the sole discretion of the Management.

13. Grievance and Complaint Mechanism

The Company has a system that ensures quick response and remediation to complaints, requests, grievances, or other issues. A complaint or request or grievance shall be lodged with the respective Functional Head. The Functional Head shall endeavor to address or redress within 15 working days of receipt. If not resolved within the stipulated period, it shall be escalated directly to Head of HR function through email or written communication. The Head of HR shall examine and investigate and provide report to Managing Director within 15 working days with recommendations for resolution. External help may be taken if deemed necessary.

This policy embodies the Company's commitment to conducting business ethically and responsibly, protecting human rights, and ensuring dignity and freedom for all workers throughout its operations and value chain. The Company shall work collaboratively with suppliers, business partners, government agencies, NGOs, and communities to create a world free from child labour, forced labour, bonded labour, and human trafficking.

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