
ARIHANT FLEXIPACK

SOCIAL BUSINESS AND EHS POLICIES

Document Information			
Document Name	SOCIAL, BUSINESS AND EHS POLICIES AND CODE OF CONDUCT	Intended User	All
No. of Pages	21	Copy Circulated to	All
Location	Factory	Document No.	
Author	Partner	Effective Date	1/4/2015
Issued By	Vatsal shah	Revision No.	00
Approved by	Vatsal Shah		

Management Approval			
Name	Designation		1/4/15
Vatsal Shah	Partner	Sign	Date

This manual is intended for the sole use of ARIHANT and is provided to customers and supplier. The contents of this manual may not be reproduced or reprinted in whole or in part without the express written permission of the ARIHANT FLEXIPACK.

INDEX

ETHICS AND BUSINESS INTEGRITY POLICY	3
Fraud, Bribery and Corruption	4
Facilitation payments.....	4
Political donations.....	5
Gifts and Hospitality.....	6
Ethical Procurement	7
Money Laundering	8
Respect for Human Rights.....	9
Reporting, Disclosure and Whistleblowing.....	9
Conflicts of Interest.....	10
Data confidentiality.....	10
Non discrimination policy	12
Policy for Freedom of association and collective bargaining	14
Induction Policy.....	15
Identify the Employees for Induction Program:	15
Sort Out the Induction Program:	15
Schedule the day of Induction:	15
Arrangements:	15
Evaluation of Induction Program:	15
Leave policy.....	17
Permanent Employees (staff)	17
Permanent employees (workers)	17
Types of Leaves:.....	17
SHE Policy.....	20
Policy on Prohibition of Child Labour and Prevention of Forced Labour at the Workplace.....	20
Implementation	20

ETHICS AND BUSINESS INTEGRITY POLICY: - (AFP-POL-01)

Introduction to the policy by the Partner

Behaving ethically is essential to working with Arihant . Our values of Openness, Collaboration, Mutual Dependency, Professional Delivery, Sustainable Profitable Growth and Innovation are the standards by which we have been judged since Arihant 's foundation in 2012 As such, it is fitting that they are the cornerstone of this Ethics and Business Integrity policy.

- As individuals, collectively and as a company we will:
- Apply the principles set out in the Ethics and Business Integrity Policy in everything we do.
- Ensure that we comply with company policies and procedures.
- Comply with applicable laws, rules and regulations and where the standards of behavior expected by Arihant are higher we will apply these higher standards.
- Seek guidance where we are unsure of the appropriate course of action.

This Ethics and Business Integrity Policy sets out the standards and behaviours that all our people are expected to meet, wherever in the world we operate. This document also provides more detailed information on the issues it covers via the links to policies and procedures. It also identifies who you can ask for help.

This Ethics and Business Integrity Policy and its attachments cannot give you the answer to every situation or event that you may face in your role. It seeks to provide the primary guidance you should follow and sets out an Ethical Decision Making Tool. This should help you consider if your course of action is appropriate or if you need to seek further advice and guidance from the sources set out in the Policy.

Partner

Fraud, Bribery and Corruption

Prohibition of fraud, bribery and corruption

Arihant takes extremely seriously the effective prevention and detection of fraud, bribery and corruption and any other fraudulent or corrupt activity. It will not tolerate them in any form. The top management is fully committed to promoting a zero tolerance approach across the group. As well as being illegal, fraud, bribery, corruption and any other fraudulent or corrupt activity are damaging to all parties who engage in them.

Definitions.

Corruption usually occurs because some individuals are willing to use illicit means to maximise personal or corporate profit. Corruption includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence and money laundering.

A bribe is not necessarily just a gift of money. It is an action where a person promises or gives a financial or other advantage which is designed to induce any party to perform a function improperly or reward them for having performed a function improperly. The payment or monetary value need not be of large value – for example it could be an invitation to a sporting event.

Fraud is an act of deception intended for personal gain or to cause a loss to another party. The general criminal offence of fraud can include deception whereby someone knowingly makes false representation, or they fail to disclose information, or they abuse a position.

Principles

We will not offer, give or receive bribes or improper inducements for any purpose whether directly or via a third party. This prohibition applies to employees, subsidiaries, business partners, suppliers, agents and anyone else acting for or on behalf of Arihant . Our policy applies to every part of our business and to every part of the world in which we operate. We will endeavour to adopt best practice and aim not to do business with any party who breaches this policy

We expect all staff to act honestly and with integrity to safeguard Arihant's and our customers' assets, including information, goodwill and property. We each have a responsibility for fraud prevention, detection and reporting and the Top management encourages anyone with reasonable suspicions of fraud or corruption to report them. All cases of attempted, suspected or proven fraud or corruption will be investigated and dealt with appropriately. No employee will suffer as a result of reporting reasonable suspicions.

Facilitation payments

Our people may be asked for a payment to carry out or speed up a process. Such payments are known as facilitation payments. They are considered as a bribe as such they are illegal and they are prohibited by this Policy.

Supporting our people

Arihant will not penalise any employee by demotion, penalty or otherwise where an employee refuses to accept or pay a bribe, make a facilitation payment or engage in any form of fraudulent or corrupt activity, even if that refusal results in a loss of business to Arihant .

Political donations

Political donations can be perceived as unduly influencing a third party. Arihant does not support or engage in any form of political donations. No employee or Arihant group company will be permitted to make a political donation on behalf of or in Arihant 's name.

What should I do?

We must all be particularly vigilant concerning gifts, hospitality and the actions of third parties engaging in transactions on our behalf. These three areas can frequently involve giving or accepting a bribe in ways which are not immediately identifiable.

Anyone who is offered a bribe or asked for a bribe, or is aware of any form of fraudulent or corrupt activity should report it immediately to their Line or top management immediately.

Gifts and Hospitality

You should always consider whether the giving or receiving of a gift/hospitality is appropriate. It is prohibited to offer or receive gifts or hospitality that could influence or be perceived to be capable of influencing the outcome of transactions or decisions relating to Carillion's business.

Your responsibilities

We are each responsible for knowing what our business guidance allows in respect of receiving and giving gifts and hospitality. Always seek guidance and approval from your Line Manager before accepting or giving any gifts or hospitality.

Recording benefits

All benefits must be recorded in a register to ensure transparency and avoid accusations of misconduct.

Who do I contact for help or advice?

Plant Incharge/Partner

Ethical Procurement

Working with Others

All at Arihant must ensure that our ethical standards and behave respectfully when working with others. The relationships with our suppliers and business partners are based on the principle of fair and honest dealings at all times and in all ways. We expect our suppliers and business associates and joint venture partners to extend the same high standards to all others with whom they do business, including employees, sub-contractors and other third parties.

Adoption of policy

We expect all of our business associates, joint venture partners and suppliers to adopt the same or equivalent standards as set out in the Ethics and Business Integrity Policy and we reserve the right not to do business with companies where it can be demonstrated that significant violations of the policy exist.

Code of Ethics

There is a Code of Ethics for all employees involved in purchasing and supply chain management. There is also a Supplier Charter and Sustainable Procurement Policy which all suppliers will sign up to. This code, charter and policy must be followed.

Who do I contact for help or advice?

Plant incharge/Partner

Money Laundering

Money Laundering

Arihant aims to maintain our high standards of conduct by preventing criminal activity through money laundering.

What is money laundering?

Money laundering involves turning the proceeds of crime into apparently innocent funds with no obvious links to their criminal origins. There is no threshold for the criminal activity and it covers the proceeds of any crime, including terrorist activities, drug trafficking, criminal breach of environmental legislation and health and safety and planning legislation.

Money Laundering Policy

There is a detailed Money Laundering Policy, which is reviewed from time to time. The current policy must be followed and can be found using the link below.

Who do I contact for help or advice?

Partner

Respect for Human Rights

We support the belief that human rights are universal and adhere to the principles of human rights in our operations. We support the United Nations Universal Declaration on Human Rights and work hard to ensure that in all areas of interaction with our employees, clients, suppliers, third parties, interviewees and joint venture parties that everyone is protected and treated absolutely fairly.

Diversity

Arihant respects and embraces diversity and expects its employees, suppliers and business partners to do the same.

Training Programmes

As applicable, our people are required to undertake health and safety and equality and diversity training programmes. Your Line Manager will be able to give you guidance on whether you are required to take these training programmes.

Health and Safety and Equality and Diversity Policies

There are detailed policies, which are reviewed from time to time. The current policies must be followed and can be found using the link below.

Who do I contact for help or advice?

Partner

Reporting, Disclosure and Whistleblowing

Responsibility

All Arihant people have a responsibility to protect Arihant assets, including information and goodwill as well as property. Carillion encourages its people to raise genuine concerns about malpractice at the earliest possible stage and in the right way.

Concerns

Concerns will be treated seriously and investigated appropriately; where possible you will be kept up to date with progress.

Reporting

If you have a concern about malpractice you should use the option below you feel most comfortable with to raise concerns:

Plant incharge.

Conflicts of Interest

All Arihant people must disclose or seek direction on any issues that could potentially conflict with their responsibilities to the company.

What is a conflict of interest?

Conflicts of interest may arise when two or more competing interests could impair the ability to make objective, unbiased business decisions, which are not necessarily in the best interests of Arihant. Conflicts of Interest may take the form of financial interests in a competitor, supplier or customer business, recruiting a close family member, close or longstanding friendships or relationships with competitors, suppliers or customers or engaging in employment outside Arihant.

Disclosure

In all cases potential conflicts of interest should be disclosed to your Plant Incharge, discussed openly and recorded. An annual update will be required.

Conflicts of Interest Policy

There is a detailed Conflicts of Interest Policy, which is reviewed from time to time. The current policy must be followed.

Who do I contact for help or advice?

Plant Incharge/Partner

Data confidentiality

Privacy and use of personal and official information

Employees have an obligation to ensure that professional information is secured against loss, misuse or unauthorised access, modification or disclosure.

Employees have a duty to maintain the confidentiality, integrity and security of official information for which they are responsible.

Records management

Employees need to be aware of their record keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures.

All employees must therefore ensure that documents are not placed in unofficial or private filing systems but place such documents in official files.

Employees must not remove documents from official files. They are controlled records, and must be complete, up-to-date and capable of providing organisational accountability when officially scrutinised.

Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule, which has been approved by the Chief Executive Officer.

Information technology

Employees must not access information which they are not authorised to access or use, and must not allow any other person access for any reason.

Employees must take all reasonable precautions, including password maintenance and file protection measures to prevent unauthorised access and have an obligation to maintain the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement.

Non discrimination policy: - (AFP-POL-02)

Arihant is committed to the principle of equal opportunity employment. Arihant prohibits discrimination against and harassment of any employee, applicant for employment, third party or community member because of race; color; national or ethnic origin; age; religion; disability; sex; sexual orientation; gender; gender identity and expression; including a transgender identity; other characteristic protected under the law, herein called “protected categories.”

This Human Rights and Labor Policy Statement outlines standards to ensure that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their effort. Arihant is committed to upholding the protection of human rights of all workers where it is possible through our sphere of influence. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same high standard. Arihant supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes businesses should ensure that they are not complicit in human rights abuses.

SCOPE

This Human Rights Policy Position Statement is intended to state the company’s position to all Arihant employees.

ELEMENTS*

Freely Chosen Employment

Debt bondage: Forced, bonded or indentured labor; involuntary prison labor; slavery or trafficking of persons shall not to be used. All work will be voluntary in the production of Arihant products and services.

No Underage Workers

Child labor is not to be used under any circumstances. All employees must meet the minimum age requirement set by local laws.

Minimum Wage, Hours and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours shall be limited to what is acceptable by local laws.

Humane Treatment

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment.

Nondiscrimination

We are committed to a workforce that is free of harassment and unlawful discrimination, including race, color, religion, national origin, gender (including pregnancy), age, disability,

sexual orientation, gender identity, HIV status, marital status, past or recent military status or any other status protected by the laws or regulations in the locations where we operate.

Dealing With Management, Freedom of Association and Collective Bargaining

We believe that workers' rights are best protected by allowing each worker to deal directly with management on issues of importance to that worker. We also respect the rights of workers to associate or not associate with third-party organizations, join or not join labor unions, seek representation, bargain or not bargain collectively in accordance with local laws.

Policy for Freedom of association and collective bargaining: - (AFP-POL-03)

All workers and employers at Arihant have the right to establish and to join organisations of their choice, without prior authorization, to promote and defend their respective interests, and to negotiate collectively with other parties. They should be able to do this freely, without interference by other parties or the state, and should not be discriminated as a result of union membership. Freedom of association is a fundamental human right and, together with collective bargaining rights, a core ILO value. The freedom to associate involves employers, unions and workers representatives freely discussing issues at work in order to reach agreements that are jointly acceptable. The right of association includes the right of workers (usually those outside of 'essential services') to strike. The rights to organise and to bargain collectively are enabling rights that make it possible to promote democracy and sound labour market governance. Through organisation workers are able to lobby for just and decent terms and conditions of work.

Induction Policy: - (AFP-POL-04)

Objective: Enabling the new/old employees to become familiar with the work environment and all the terms, conditions, policies and procedures that are followed at work place. Also to give a brief idea of the benefits offered.

Scope: Understand clearly about all the policies and procedures that will be followed in an organization.

Identify the Employees for Induction Program:

By conferring with all the departments, employees will be identified for the induction program based on the necessity.

Sort Out the Induction Program:

Once the identification of the employees for induction is done, complete induction program should be sorted out which includes identifying the topics on which induction should be given, ascertaining the person to give induction and all.

Schedule the day of Induction:

The day of induction should be specified in advance and intimate the same to the employees who need to attend the induction program. Ensure that all the listed out candidates attend the program with out fail.

Arrangements:

Make necessary arrangements in order to conduct the induction program like arranging the room, for snacks, material and etc.

Evaluation of Induction Program:

Prepare a checklist to ensure that all the topics listed out are covered, it should be issued to the employees attending the induction program and collected after completion of the program. Take feedback from the employees and make necessary changes to improve.

Responsible Person:

Plant incharge

Topics that should be covered in Induction

- ❖ Company History
- ❖ Company policies
- ❖ Rules and Regulations that should be followed
 - I. Rules about PC/phone use,
 - II. Have been introduced to their immediate supervisors and colleagues.
 - III. Health and Safety rules

- ❖ Policies and Procedures that company follows
 - I. Time-recording procedure,
 - II. Rest/meal break times,
 - III. Location of their personal work station,
 - IV. Key points of conduct

- ❖ Work environment
- ❖ Reporting authorities
- ❖ Benefits offered to the employee's
 - I. Medical Benefits for employees and their families
 - II. Health/Disability benefits
 - III. PF/ESI
 - IV. Loan facility
 - V. Leave Encashment
 - VI. Awards and Rewards
 - VII. Performance based benefits

Leave policy: - (AFP-POL-05)

All Regular employees employed at are entitled for the following leave during Calendar year while they are in service with the Company. For the purpose of calculating leaves, the calendar year i.e. January to December will be considered. Every year on January 1st the leave will be credited to the account of an employee. It needs to be credited upon completion of one year or atleast two times viz. every January and July.

Every employee will have to take prior approval of his/her HOD and intimate the same to HR department before going on leave through spine software.

Different kind of employees will be treated in the following manner for the sake of leaves:

Permanent Employees (staff)

Permanent employees will be entitled to avail the privilege leave up to a maximum of 21. The maximum CL and SL for this cadre are 7 each respectively in a year.

Permanent employees (workers)

Such employees shall be entitled one day casual leave for every month provided he/she attends office at least for 20 days. The maximum limit for CL for such employees will be 7.

In addition to the CL employees on probation may avail sick leave up to a maximum limit of 7 in a year.

Any leave availed in excess would be treated as Leave without Pay (LWP). In above leave would be credited only on pro-rata basis.

Types of Leaves:

Short Leave

Definition: It is a leave to help employees to attend their family/social urgencies without taking a half day or full day leave, For example. attending marriages, banks, parent-teacher meetings etc.

An employee can take 2 hours short leave for maximum three times in a month with prior approval of HOD. The approval must be with authorization and should be communicated to HR in advance through spine software.

Casual Leave:

- ❖ Casual leave will not be accumulated and any balance CL at the end of the year will be lapsed, if not availed during the calendar year.
- ❖ Half day Casual leave can be availed.
- ❖ Not more than 3 Casual Leaves will be sanctioned at a time.

- ❖ Casual Leaves cannot be clubbed with any other leave.
- ❖ Application for Casual leave can be submitted in advance, in case of planned leave.

Employees, who wish to avail casual leave, should intimate the immediate superior / HOD or the HR Department through spine software.

Sick Leave:

It's a leave which can be taken while the individual is not able to attend the office because of ill-health / injury / hospitalization.

An employee is entitled for 7 days Sick Leave in a calendar year during his/her service with the Company. Those employees who are covered under ESIC would be eligible for leave as per ESIC Act.

- ❖ A Medical Certificate from a Registered Medical practitioner should be submitted in case of SL for more than **THREE** days.
- ❖ In case of prolonged illness a Medical Certificate from the Doctor should be submitted while on treatment and a fitness certificate to be produced at the time of resuming duties. Without Fitness Certificates, employees will not be allowed to resume duties.
- ❖ Sick leave can be availed in half days.
- ❖ The Management has its own discretion to refer any employee for Medical check-up to any Company nominated Doctor and the employees are bound to report to the said doctor.
- ❖ Sick leave cannot be accumulated or upto a maximum of 14 days. – please clarify.

Privilege Leave / Earned Leave:

An employee is entitled for 21 days' Privilege/Earned leave in a calendar year during his/her service with the Company. To be eligible for this leave he/she has to work for a minimum period of 240 days with the organization.

- ❖ An employee can avail Privilege leave up to a maximum of three times in a year.
- ❖ Minimum three days' PL should be availed at a time and less than three days' PL will not be sanctioned.
- ❖ PL can be accumulated, subject to a maximum of 63 days. Thereafter the same will be en-cashed in case of not availing.
- ❖ If an employee resigns of his/her services or terminated, he/she can claim the reimbursement of his/her salary in lieu of his/her un-availed PL.
- ❖ PL can be not availed in continuation of Casual Leave. However in long sickness PL can be clubbed with SL after a written application through the Plant Incharge, which would be considered by Partner as a special case.
- ❖ Application for PL of more than 5 days should be made at least **15 days** in advance for planned leave and only on receiving the approval an employee can proceed on leave.
- ❖ The Management has its right to instruct an employee, during his/her sanctioned leave, to report back for work in case of emergencies when their services are required by the Company during the period of his/her leave. In this case he/she has to comply with the instructions.

Maternity Leave :

Female employees are entitled for the above leave as per Rules and Regulations of Maternity Benefit Act, 1961, on two occasions during entire service period with the Company. However, employees are not entitled for Paternity leave.

Leave Rules				
Type of Employees	Particular	Casual Leave	Sick Leave	Privilege Leave
Regular Employees	Entitlement	7	7	21
	Accumulation	0	0	63
Probationers	Entitlement	7	7	0
Trainees	Entitlement	0	7	0

Any leave taken before and after the leave would be considered as leave i.e. prefix and suffix – if any employee availing leave on Saturday and Monday, Sunday would be automatically considered as leave in any type of leaves i.e. CL/SL/PL.

SHE Policy: - (AFP-POL-06)

We **ARIHANT FLEXI PACK** believe that the Safety and Health of our Employees and safe working environment are fundamental to our operations. We will ensure this by providing and maintaining safe working conditions, continuous training.

We shall continue our commitment to safety, health by:

- Complying with relevant legal statutes.
- Using and maintaining personal productive Equipments, systems and facilities to provide a safe work atmosphere to our Employees, Contractors and Visitors.
- Maintaining good housekeeping and conserving resources and preventing pollution.
- Creating safety, health and environmental awareness and developing the required level of knowledge and skills in all employees through need based training and internal communication.
- Continually improving safety, health and environmental aspects through objectives targets and Management programmes.

Policy on Prohibition of Child Labour and Prevention of Forced Labour at the Workplace: - (AFP-POL-07)

Arihant believes in a "No Child Labour and No Forced Labour" policy.

To ensure that no person below the age of eighteen years is employed in the workplace ;

To prohibit the use of forced or compulsory labour;

To ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work ;

To refrain from engaging with vendors and suppliers who resort to using child labour and forced labour in their operations.

Implementation

This policy is communicated to all employees in an appropriate and meaningful manner.

Arihant have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including processing of grievances for redressal. Production, Partner will ensure implementation of this Policy.

Compliance with the Policy will be regularly monitored and evaluated by the Partner. The report of the same will be reviewed by the Management every quarter.