LABOUR RIGHTS & ETHICAL EMPLOYMENT COMPLIANCE

Forced Labour I Child Labour I Prison Labour I Human Trafficking
Effective Date: 01-August-2026 I Revision No.: 001 I Department: Human Resources

1. Purpose

Sertel Electronics Pvt Ltd is committed to maintaining a workplace that respects human dignity, freedom, equality and fundamental labour rights. The Company has zero tolerance for forced or compulsory labour, child labour, bonded or debt-based labour, unlawful or involuntary prison labour, human trafficking, slavery or practices similar to slavery, and any form of coercion or exploitation.

2. Scope

This policy applies to permanent and temporary employees, contract and outsourced workers, apprentices, trainees, consultants, security and housekeeping personnel, manpower agencies, suppliers, vendors, contractors and other business partners working for or on behalf of Sertel Electronics Pvt Ltd.

3. Policy Statement

Employment shall be based on free and informed consent and shall comply with applicable employment and labour laws. No employee or worker shall be forced, threatened, deceived, intimidated or otherwise compelled to work against their free will.

4. Forced or Compulsory Labour

The Company prohibits work performed under threats, intimidation or coercion; restriction of an employee's freedom to leave employment; withholding identity documents; deceptive recruitment; forced overtime through threats or punishment; debt-based or bonded labour; and any arrangement that prevents a worker from freely discontinuing employment in accordance with applicable law.

5. Child Labour

The Company strictly prohibits employment of children in violation of applicable law. HR shall conduct age verification during recruitment and onboarding. The Company will not knowingly employ or engage a person below the legally permissible working age.

6. Age Verification

HR shall verify age using appropriate government-recognized documents such as a birth certificate, government-issued identity document, school/education certificate or other legally acceptable document. Employment shall not commence where required age verification has not been completed.

7. Bonded / Debt Labour

The Company prohibits bonded labour and debt-based employment. No worker shall be required to work to repay recruitment fees, personal debts, loans, advances, transportation costs, accommodation charges or other financial obligations.

8. Personal Documents

The Company shall not retain original personal documents as a means of controlling or restricting employment. Temporary verification documents shall be handled responsibly and returned promptly.

9. Recruitment Fees

Employees and workers shall not be required to pay unlawful recruitment or placement charges as a condition of employment. HR shall take reasonable steps to ensure agencies and manpower contractors do not impose exploitative recruitment fees.

10. Human Trafficking

Sertel Electronics Pvt Ltd strictly prohibits human trafficking in connection with its business operations and shall not knowingly engage or support any person, agency, contractor or supplier involved in trafficking or exploitation.

11. Prison Labour

The Company shall not knowingly use prison labour that is unlawful, involuntary or inconsistent with applicable law. Any correctional or rehabilitation engagement shall have appropriate legal authorization and safeguards against exploitation.

12. Freedom of Movement

Employees and workers shall be free to move within and outside the workplace subject to reasonable safety requirements. Physical restraint, unlawful restriction, threats and confiscation of documents to restrict movement are prohibited.

13. Working Hours and Overtime

The Company shall comply with applicable working-hour and overtime requirements. Employees shall not be forced to work overtime through threats, intimidation or unlawful disciplinary action.

14. Wages and Payments

Employees shall receive wages and statutory benefits in accordance with applicable law and Company policy. The Company shall not withhold wages to force continued employment or intentionally delay payment to prevent an employee from leaving.

15. Contractors and Manpower Agencies

The Company shall take reasonable steps to ensure contractors and manpower agencies comply with this policy, including age verification, lawful wages, ethical recruitment, prohibition of forced and child labour, prevention of trafficking and proper documentation.

16. Supplier Requirements

Suppliers and vendors are expected to comply with the Company's ethical labour standards. Procurement may include labour-rights requirements in vendor registration, supplier evaluation, purchase agreements, declarations and audits.

17. Reporting and Non-Retaliation

Employees and workers are encouraged to report suspected violations. Reports may be submitted to HR at hr@sertelelectronics.com. Retaliation against a person reporting a concern in good faith is prohibited.

18. Corrective Action

Actions may include removing an affected worker from an unsafe situation, correcting records, paying legally due wages or benefits, disciplinary action, contractor/vendor corrective action, suspension or termination of engagement, additional training and strengthening recruitment controls.

19. Responsibilities

HR is responsible for communication, age verification, records, monitoring, training and investigations. Management is responsible for leadership, resources and corrective action. Employees are responsible for following this policy, respecting worker rights and reporting suspected violations.

20. Training and Awareness

HR shall provide awareness on forced labour, child labour, human trafficking, bonded labour, worker rights, reporting mechanisms and non-retaliation. Training attendance shall be documented.

21. Records and Review

Records shall include age verification, employment records, contractor declarations, supplier compliance records, training records, complaints, investigations and corrective actions. HR shall review this policy periodically.

22. Policy Violations

Violation by an employee may result in disciplinary action up to and including termination, subject to applicable law and Company procedures. Contractors, suppliers or agencies may be subject to corrective action, suspension or termination.

23. Management Declaration

Sertel Electronics Pvt Ltd is committed to maintaining a workplace free from forced labour, child labour, unlawful prison labour, bonded labour and human trafficking and to respecting the dignity and fundamental rights of every employee, worker, contractor and business partner.

FOR SERTEL ELECTRONICS PVT LTD

Authorized Signatory: _____

Name: Mr. Srikanth G

Designation: Director

Date: 24/08/2026

EMPLOYEE AGE VERIFICATION FORM

Purpose: To verify employee age before employment/engagement.

Employee Name _____

Employee ID _____

Department _____

Designation _____

Date of Joining _____

Date of Birth _____

Age at Joining _____

Document Type Submitted _____

Document Number / Reference _____

Verified By HR _____

Verification Date _____

Employee Declaration

I confirm that the age/date of birth information and supporting document submitted by me are genuine and accurate. I understand that false information may result in action as per Company policy and applicable law.

Employee Signature: _____ Date: _____

HR Verification Signature: _____ Date: _____

CONTRACTOR/ MANPOWER AGENCY LABOUR COMPLIANCE DECLARATION

Contractor/ Agency Name: _____

Address: _____

Contract/ Work Order Reference: _____

Period: _____

Declaration

- No child labour in violation of applicable law.
- No forced, bonded, compulsory or trafficked labour.
- No unlawful or involuntary prison labour.
- Workers are not threatened, coerced or unlawfully prevented from leaving employment.
- Original personal identity documents are not retained to control workers.
- Workers are not charged unlawful recruitment or placement fees.
- Wages and statutory benefits are paid in accordance with applicable law.
- Working hours and overtime comply with applicable requirements.
- We will cooperate with reasonable compliance checks, audits and investigations.
- We will immediately inform Sertel Electronics Pvt Ltd of any serious labour-rights concern.

Authorized Representative: _____

Designation: _____

Signature & Seal: _____

Date: _____

SUPPLIER HUMAN RIGHTS DECLARATION

FORCED/ CHILD LABOUR & HUMAN TRAFFICKING AUDIT CHECKLIST

Audit Date: _____ Auditor: _____

Department / Supplier/ Contractor: _____

No.	Audit Checkpoint	Status **(Y/N/NA)**	Remarks / Evidence
1	Age verification records are maintained.		
2	No worker below the legally permissible age is engaged.		
3	Recruitment process does not involve coercion or deception.		
4	No forced or bonded labour indicators are identified.		
5	No unlawful recruitment debt or fee is imposed.		
6	Original identity documents are not retained to restrict employment.		
7	Workers are free to leave employment in accordance with applicable terms/law.		
8	No threats or intimidation are used to compel work.		
9	Working hours and overtime are legally managed.		
10	Wages are paid correctly and on time.		
11	No unlawful deductions or wage withholding are identified.		
12	No evidence of human trafficking or exploitation is identified.		
13	No unlawful/involuntary prison labour is used.		
14	Contractor declaration is available where applicable.		
15	Supplier human-rights declaration is available where applicable.		
16	Employees/workers know how to report concerns.		
17	Non-retaliation requirements are communicated.		
18	Training/ awareness records are maintained.		

Overall Result: □ Compliant □ Partially Compliant □ Non-Compliant

Corrective Action Required: □ Yes □ No

Corrective Action / Due Date: _____

Auditor Signature: _____ Department/Owner: _____

Management / HR Review: _____ Date: _____

EMPLOYEE GRIEVANCE/ LABOUR RIGHTS COMPLAINT FORM

Employee/ Worker Name (optional, if anonymous): _____

Employee ID / Contractor Reference: _____

Department / Work Location: _____

Date of Complaint: _____

Contact Details (optional): _____

Nature of Complaint: _____

Type of Concern: □ Child Labour □ Forced/Bonded Labour □ Human Trafficking □ Prison Labour
□ Recruitment Fee/Exploitation □ Document Withholding □ Wage/Overtime □ Threat/Coercion □ Other

Details of Complaint/ Incident:

_____

_____

_____

_____

Immediate Risk/ Safety Concern: □ Yes □ No
Supporting Evidence/ Documents: _____

For HR Use Only

Complaint Reference No.: _____

Date Received: _____

Assigned HR Representative: _____

Investigation Status: _____

Corrective Action: _____

Closure Date: _____

Confidentiality Note: Information will be handled confidentially to the extent reasonably possible and in accordance with applicable law and Company procedures.

Employee/ Complainant Signature (if applicable): _____

HR Signature: _____ Date: _____