

**SIDDHOMAL PAPER CONVERSION CO. PVT. LTD.**  
**20, LONI ROAD, INDUSTRIAL AREA**  
**MOHAN NAGAR, GHAZIABAD**

# **SOCIAL POLICY GUIDELINES**

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# CONFLICT OF INTEREST

## Statement of Policy:

A "Conflict of Interest" is a situation where one or more persons of SMPC have competing interests and the serving of one interest may involve detriment to another. This Policy applies that a Conflict of Interest gives rise to the risk of one or more of the following: -

- ✓ The SMPC and/or management / staff members failing to comply with legal or regulatory obligations.
- ✓ The SMPC and /or management / staff members failing to fulfil a duty of trust owed to another person or customer.
- ✓ A staff member professional judgement and objectivity being compromised and /or hindering the proper discharge of their duties and responsibilities.
- ✓ A staff member engaging in unethical conduct; and/or
- ✓ SMPC is obtaining improper advantage or giving rise to reputational damage to the customer

SMPC respects its employees' right to privacy in their personal affairs and activities. However, it is possible that an employee's personal or family activities may raise an actual or potential conflict with their duty of loyalty to SMPC. This includes any personal interest which may affect employees' impartiality in any matter relevant to their duties. Employees should promptly disclose these facts or circumstances to their line managers.

A Conflict of Interest under this policy includes both an actual conflict of Interest (i.e a Conflict of Interest that has arisen) and a potential Conflict of Interest (i.e a Conflict of Interest that may arise give particular facts and circumstances).

# BRIBERY, CORRUPTION, GIFTS AND DONATIONS

THE DIRECT OR INDIRECT OFFER, PAYMENT, SOLICITING OR ACCEPTANCE OF BRIBES OR FACILITATION PAYMENTS IN ANY FORM IS UNACCEPTABLE.

## **Statement of Anti - Bribery Policy:**

SMPC maintains an Anti-Bribery Policy prohibiting any improper or unethical payment to government officials or compliance Auditors or any private company or person by any SMPC Staff or Associate or agent of SMPC. This anti Bribery Policy is designed to comply with the requirements of the SMPC Management. This Policy states:

- ✓ No SMPC staff or associate or agent has the authority to offer payments of money or anything else of value, whether directly or indirectly, to a government official or Auditors to induce that official to affect any governmental act or decisions, or any of its associates or agents, to obtain or retain business.
- ✓ Every staff or Associate or Agent has the obligation to record accurately and fairly all of their transactions involving any expense or any other transaction involving the disposal or transfer of SMPC assets.
- ✓ SMPC has a clear position on bribery and corruption and has a Zero Tolerance Policy on these issues: SMPC employees do not offer or accept bribes. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form (including favors) by our employees, is unacceptable. SMPC promotes its policy on bribery and corruption amongst its business partners, including joint ventures, contractors and suppliers.
- ✓ SMPC Policy makes no distinction between bribes and so-called 'facilitation' payments, which are also prohibited.

## **Statement of Gifts & Hospitality Policy:**

IT IS IMPORTANT THAT GIFTS OR HOSPITALITY NEVER INFLUENCE IMMEDIATE BUSINESS DECISION-MAKING PROCESSES, OR CAUSE OTHERS TO PERCEIVE AN INFLUENCE.

SMPC strictly forbids employees to solicit gifts or hospitality. As a general principle, we discourage employees from accepting gifts or hospitality from a business partner.

Notwithstanding this, SMPC recognizes that the occasional acceptance or offer of modest gifts and hospitality may be a legitimate contribution to good business relationships. However, it is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence.

# CONFIDENTIALITY

## Statement of Policy:

SMPC IS COMMITTED TO RESPECTING THE Confidentiality OF ANY PERSONAL DATA THAT IT PROCESSES.

- ✓ This policy covers our treatment of personal information, process information and any other information provided by stockholders to any third party or personal.
- ✓ SMPC respects any individual's general right to Confidentiality of their personal data and will accordingly adhere to all applicable laws on the use of personal data.
- ✓ Personal data should be obtained by lawful means and, where required, with the knowledge or consent of the data subject.
- ✓ The purpose for which personal data is collected should be permitted by law.
- ✓ Those with access to personal data must only use it in a way authorized by applicable law.
- ✓ There may be legal restrictions on transferring personal data to another party. There may be additional legal restrictions on transferring personal data outside its country of origin.

# ANTI-COMPETITIVE & RESTRICTIVE TRADE PRACTICES

## Statement of Policy:

SMPC is committed to: -

- ✓ Protecting the “Customer and Supplier Interest” by Not becoming a part of Anti-Competitive Agreements or to form a Cartel to bargain with the customers and Suppliers
- ✓ Ensuring Fairness and Equity in Market Place Transactions
- ✓ Not taking advantages of Customers or Suppliers
- ✓ Compliance with prescribed Product Standards
- ✓ Result based Endorsement of Products manufactured by SMPC
- ✓ Accurate Price Information
- ✓ By providing pertinent information to customers and suppliers

# FORCED AND CHAILD LABOUR

## Statement of Child Labour Policy:

As defined in the Child Labour (Prohibition & Regulation Act), 1986 (Employment of child and young worker act) "Child Labour" should not recruited for the company. Minimum hiring age of employees should exceed 18 years.

- ✓ SMPC shall ensure that No Child, who has not completed Eighteen years of age, shall be required or allowed to work in any occupation in the factory.
- ✓ SMPC shall also adhere all applicable laws of employment of adolescents and prohibit adolescents from performing any work that is likely to be hazardous to their health and physical development.
- ✓ SMPC shall restrict the use of Child Labour by any of their contractors in what-so-ever circumstances.

# COMPENSATION AND WORKING HOURS

## **Statement of Working Hours Policy:**

SMPC shall regulate provisions relating to hours of work, overtime, rest periods, holidays and any other requirement as established by the applicable local laws.

Overtime work should be voluntary. No employee shall be forced to work overtime. Any employees who wish to leave after normal working hours will be permitted to leave the factory without obtaining any approval from factory authorities.

## **Statement of Compensation Policy:**

SMPC shall ensure timely payment of minimum wages to all persons employed by the factory as established by the applicable local laws, or the prevailing industry wage norms, whichever is higher.

The factory shall pay such wages for hours of work in a normal working day, and overtime hours at the rates as per applicable local laws / industry norms and provide all legally mandated benefits with the terms and conditions indicated in the letter of appointment of employees. These payments shall not be less than the minimum amounts stipulated by the local law for the relevant category employees and shall be paid within 07 days after the end of the month.



# NON-DISCRIMINATION

## Statement of Policy:

SMPC is committed to provide non-discriminatory and healthy work environment in the work place for its all employees as well as those persons who are directly or indirectly associated with company's operations.

Any employee of SMPC shall not subject to discriminate in employment, salary benefits, discipline, advancement or termination on the basis of any of following: -

- ✓ Religion
- ✓ Caste
- ✓ Sex
- ✓ Age
- ✓ Place of Birth
- ✓ Language
- ✓ Disability and
- ✓ Descent
- ✓ Political choice

# MAINTAINING APPROPRIATE FINANCIAL RECORDS

## Statement of Policy:

SMPC, recognizing its responsibility to ensure the preservation of financial records documenting the activities of the SMPC. It adheres to the following policy for the collection, preservation and maintenance of records concerning the financial operation of the company. Financial records retention policies and practices have been established to provide consistent operational practices among the departments and to ensure compliance with government regulations.

SMPC conducts business under the rules and regulations of defined by the government from time to time. These financial documents are maintained for a defined time frame.

# LEGAL AND REGULATORY COMPLAINCES

## Statement of Policy:

SMPC is committed to: -

- a) To identify legal and regulatory requirements applicable to company and other requirements to which SMPC subscribes and to have access to these regulations.
- b) To track any changes in these legal and other voluntary requirements, including any new legislations which may become applicable in future and
- c) To ensure and monitor the compliance with these legal and other requirements.

## **FAIR DEALING WITH VENDORS/SUPPLIERS**

### **Statement of Policy:**

SMPC is committed to give equal opportunities to all suppliers. SMPC ensures implementation of standard practices for selection and timely payments.

SMPC also expects that all suppliers are required to act honestly, in good faith, and with professionalism. No Supplier may take unfair advantage of another person through harassment, manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

## **DIVERSITY IN WORKFORCE**

### **Statement of Policy:**

SMPC is committed to the principles of workforce diversity and equity in employment, which includes recognising, respecting and valuing individual differences, such as: -

- gender
- age
- language
- ethnicity
- cultural background
- disability
- sexual orientation
- religious beliefs; and
- family responsibilities.

# ENGAGE AND INVOLVE LOCAL COMMUNITIES

## LOCAL COMMUNITY DEVELOPMENT

### **Statement of Policy:**

SMPC always believe to give back to local communities where it operates and a involved and develop local community is the important power to bring Positive, Measurable change in the company. It helps in gaining the respect of employees in the local area and also creates positive goodwill of the company.

# EMPLOYEES HEALTH & SAFETY

## **Statement of Policy:**

SMPC is committed to provide Safe & Accident Free Work Environment to employees and other stakeholders. The company is responsible for implementation of all legal requirements related to Employees Health & Safety. SMPC is also committed to improve the Safety performance.

# REDUCING CARBON EMISSION & WATER INTAKE

## **Statement of Policy:**

We at SMPC understands our responsibilities as a Company and committed to optimize the use of Natural Resources and continuously work to reduce the Carbon Emission, Hazardous Waste and Water intake from ground and thus have a sustainable business. For this purpose, Use of Technology, Involvement of People and Efficiency of Processes are vital and we are always focused in this approach.

# DISPOSAL OF TOXIC AND HAZARDOUS WASTE

## **Statement of Policy:**

SMPC is always follows the guidelines provided by regulatory bodies for disposal of waste including the hazardous and toxic waste. All the toxic and hazardous waste are properly segregated at source, identified, stored and disposed as per the defined procedure.

We pay special emphasis on products and process innovation to reduce toxicity, foster recycling of Materials, Minimize Carbon Emissions that are harmful to the environment.

# RENEWABLE ENERGY

## **Statement of Policy:**

As a responsible company, SMPC is committed to restrict the use of fossil based energy in any form and increase the use of renewable energy in phased manner thus becoming dependent upon Clean, Carbon Emission Free Energy.



# ZERO WASTE TO LANDFILL

## **Statement of Policy:**

We at SMPC are focused on developing a set of principles on Waste Prevention that encourages the redesign of resources life cycles so that all products are reused. Our goal is to no trash to be send to landfills.

# RESPONSIBLE CONSUMPTION OF RESOURCES

## **Statement of Policy:**

We at SMPC understands the importance of natural and committed to optimize the use of Natural Resources. We are committed to minimize the Wastage at each stage of operations. For this purpose, Use of Technology, Involvement of People and Efficiency of Processes are vital and we are always focused in this approach.

# PACKING MATERIALS

## **Statement of Policy:**

SMPC's commitment inline to reduce Wastage, is committed to use Recyclable Packing Materials only. However, selection of packing material is done by Customers and we are bound to follow their specifications.

# ADOPTING GREEN INITIATIVES AND PRACTICES

## **Statement of Policy:**

Our continuous endeavour towards Safe Environment Consciousness, we stand committed to adopt Green Initiatives and practice them religiously. The purpose of adopting the green initiatives are to reduce the emission of greenhouse gases generated by our operations.

## Annual Newsletter (2018-2019)

S. No	Agenda/ topic	Target (2018-19)	Status
1	Hours of Health Safety / Environment & others Training	500 hrs	850 hrs
2	Water Consumption		3.78 per ton / KL
3	Energy Consumption	400 unit per ton	380 unit per ton/KW
4	Grievance Record	-	09 record 09 resolve
5	Legal and regulatory compliances	-	<p>As our company is governed by the National Labour Laws and State labour laws, particularly we are Complying with these laws and regulations: -</p> <p>The Factories Act, 1948,                      The Payment of Wages Act, 1936                      The Child Labour (Prohibition &amp; Regulation Act), 1986                      The Industrial Disputes Act, 1946                      The Minimum Wages Act, 1948                      The Payment of Gratuity Act, 1972                      The Employees Provident Fund &amp; Miscellaneous Provisions Act, 1952                      The Equal Remuneration Act, 1976                      The Employees' State Insurance Act, 1948                      The Payment of Bonus Act, 1965                      The Contract Labour (Regulation &amp; Abolition) Act, 1970                      The Employment Exchanges (Compulsory Notification Of Vacancies) Act, 1959                      The Trade Unions Act, 1926                      The Workmen's Compensation Act, 1923                      The Apprentices Act, 1961</p> <p>Apart from these Laws, regulatory requirements related to Environment and Safety are also identified, implemented and maintained.</p>
6	CSR	-	At SMPC we strongly believe in contributing back to our society. Apart from supporting smaller causes in and around our manufacturing units, SMPC makes significant annual contribution to INOX Group CSR Trust
7	Reduce generation of hazardous waste	0.13kg per tons	0.13 kg per tons (next Fy target 0.12 kg per tons)
8	Reducing carbon emission by 20%	20%	Project on solar Power of 250 KVA has been initiated & will be completed 2021
9	Reducing water intake by 30% in 5 years	30% (5 years)	We are using RO water waste for grading and toilets
10	Eliminating use of toxic material	-	<p>We have initiated ECO friendly &amp; RHMA wrapper Trials has been conduct with Godrej Consumer</p> <p>We are the Winner 2018-2019 "I am Ardeshir"</p>