

## **Star Wire (India) Ltd**

<b>POLICY NO:</b>	<b>SWIL-02</b>
<b>POLICY NAME:</b>	<b>ETHICAL TRADING POLICY</b>
<b>CATEGORY:</b>	<b>EMPLOYMENT PRACTICES</b>
<b>EFFECTIVE DATE:</b>	<b>28TH SEPTEMBER 2015</b>

### **Objective**

Star Wire India Limited seeks to ensure that its products are manufactured to the highest technical and ethical standards under conditions that do not involve the abuse or exploitation of any person, in its own factories and by developing long term trading relationships with suppliers.

Star Wire India Limited encourages suppliers to follow its Code of Conduct and this is based on the code developed by the Ethical Trading Initiative (ETI), which is an alliance of companies, non-governmental organizations and trade union members who are working towards worldwide ethical standards of trading. Whilst Star Wire India Limited is not a member of the Ethical Trading Initiative alliance, Star Wire fully endorses their principles.

The company is committed to bring about positive improvements to good labour and ethical standards in conditions for workers in all our units.

### **Policy Statement**

Star Wire policy in relation to labour standards as relevant to the organization itself, contractors, suppliers and any other party engaged through the supply chain is as follows:

- We shall promote good labour and ethical standards in the supply chain of goods and services.
- We shall meet all requirements of current Legislation where applicable or relevant to our business
- We shall comply with the Health and Safety rules as prescribed in our laws.
- We shall promote and raise awareness of fair and ethical trading among Star Wire members, representatives and suppliers.
- We shall establish and maintain Star Wire's credibility as a purchaser of fair and ethically traded goods and services.
- We will work towards the ETI Base Code.
- We shall encourage all suppliers and contractors to adhere to the Ethical Trading Initiative as part of their respective contracts

### **Management Representative**

The management representative assigned the responsibility of implementing an effective Labour, Environment and Business Behaviour Standards Assurance System (LEBSAS) is Dr. S.K.Goel – Executive Director of the Company. The responsibilities of the Management Representative are as follows:

- To develop procedures to meet policy requirements
- To communicate labour standards, Environmental Standards and Business Behaviour issues to senior management

- To liaise with companies in the supply chain to undertake labour standard status reviews
- To set objectives and targets for labour standards assurance with plans for training, auditing and required action
- To liaise with companies in the supply chain to implement a plan of action to meet objectives
- To regularly review and improve the Labour Standards policy
- To implement training for staff involved with the LEBSAS

### **Roles and Responsibilities**

Given the size of the company and the number of units in the supply chain, it is adequate for the Executive Director to undertake the main responsibility of the LEBSAS. The Management Representative shall liaise with the Managing Director to develop the LEBSAS and present any development at regular intervals to senior management. Members of staff involved with the LEBSAS shall be identified using the training records system and skills matrix.

### **Code of Conduct**

Star Wire India Limited will endeavour at all times to act in a responsible way towards its people, and encourages our suppliers and our customers to do the same, by,

- respecting the economic, social, cultural, political and civil rights of those involved in our operations
- complying with all local human rights legislation
- implementing programmes across our whole operation, together with our supply chain partners

### **Labour Standards (Personnel rights and dignity at work)**

- Employment is freely chosen
- providing freedom of association and right to collective bargaining
- Creating a healthy and safe work environment for each employee, including company policies on Health & Safety, company & employee responsibilities, accident reporting, safety training, risk assessments, etc.
- Child Labour shall not be used
- ensuring that working hours are not excessive & remuneration are reasonable, and comply with local legislation
- precluding the use of forced labour
- Not tolerating any form of harassment in the workplace
- No discrimination in the Organisation i.e. providing employees with equal opportunities regardless of their gender, age, marital status, sexual orientation, disability, race, religion or national origin.
- Regular Employment is provided

**Environmental Standards** – Suppliers should comply with all statutory and other legal requirements relating to environmental impacts of their business. Detailed performance standards are a matter for suppliers, but should address at least the following:

- Waste is minimized, materials are reused where possible, items and goods/products made from recycled materials are produced where this is practicable.
- Air, Water and Land pollution is minimized

- Processes and activities are monitored and modified as necessary to ensure conservation of scarce resources, including water, plants & land forms.
- Minimizing contribution to global warming and other environmental impacts of energy use, by reducing the consumption of energy and energy efficiency.

**Business Behaviour** – It is expected that the supplier has, or is working towards having statements and policies on the following topics:

- Environment, Health and Safety
- Quality
- Equal Opportunities
- Training and Development
- Ethical Standards
- Diversity
- Social Objectives
- Legislative Requirements

**Operating Principles**

Star Wire is committed to the implementation of this Code of Conduct and it will be a shared responsibility between Star Wire and its Suppliers, which will be reviewed from time to time by the senior management during the Monthly Review Meetings (MRM), to determine whether the company is on target to reach their objectives and to ensure these objectives are still appropriate. This will ensure that all relevant personnel will be kept up to date with the development of the LEBSAS programme.

**Star Wire Operational Control:** Star Wire will -

1. Communicate its commitment to the Code of Conduct to the employees as well as to all suppliers of goods
2. Provide training and guidelines for relevant personnel
3. Adopt appropriate methods and systems for monitoring and verifying the achievement of the standards

For the direct operation of the company, the Employee Handbook documents, the procedures involved with controlling the labour, Environment and Business Behaviour standards of the company and addressing any risks or breaches of this policy that may be posed. <sup>[1]</sup><sub>[SEP]</sub>

**Supply Chain Management:** Star Wire expects suppliers to -

1. Accept responsibility for Labour and Environmental conditions under which products are made in all circumstances
2. Make a written Statement of intent regarding the Company’s policy in relation to the Code of Conduct and how it will be implemented and communicate this to staff and suppliers as well as to Star Wire.

**Both Parties will:**

Abide by the principles of the Code of Conduct whenever possible and always when within the capabilities of the organization.

<b>Revision No:</b>	<b>0</b>				
<b>Date of Revision:</b>	<b>NA</b>				