

Manorama Industries Limited	Document Number	MI/POL/40/04
INDIA	Document Issue Date	01.04.2018
POLICY ON CHILD LABOUR	Document Revision Date	17.09.2025
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1. Purpose

This policy outlines Manorama Industries Limited's (MIL) firm commitment to eliminating and preventing the use of child labour across all its operations and business associations. The objective is to ensure a safe, respectful, and legally compliant work environment by adhering to national labour laws and international standards on child rights and labour practices.

2. Scope

This policy applies to:

- All employees of MIL
- Contractual staff, temporary workers, and interns
- Vendors, suppliers, contractors, service providers, and business partners
- Any third-party entity operating on behalf of MIL

3. Definitions

- **Child Labour**: Employment of persons below 18 years of age in any kind of work, whether paid or unpaid, that is harmful to their physical and mental development.
- Minor: Any individual under the age of 18.
- **Business Partner**: Any third-party organization engaged in business with MIL including vendors, suppliers, and contractors.
- **Zero Tolerance**: A strict policy of not allowing exceptions in enforcing rules or standards.

4. Policy Statement

MIL strictly prohibits the employment of individuals below 18 years of age. The company will not engage with any entity that uses child labour or violates child labour laws. MIL commits to ethical sourcing, legal compliance, and the promotion of human rights by ensuring that no child labour is involved at any level of its operations or supply chain.

5. Roles And Responsibilities

Human Resources Department:

- Verify age documentation during recruitment.
- Maintain accurate and auditable records of employee age.
- Conduct internal audits to ensure compliance.
- Investigate reports of non-compliance and initiate corrective actions.

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Line Managers and Supervisors:

- Ensure no minors are employed within their teams.
- Promptly report any suspicion of child labour to HR.

Procurement and Legal Teams:

- Include child labour clauses in contracts with external partners.
- Monitor and audit vendor compliance.
- Terminate contracts with non-compliant entities.

Employees:

- Understand and comply with the child labour policy.
- Report any concerns or violations to HR confidentially.

6. Key Strategies

- Conduct regular supplier assessments and audits to evaluate child labour risks.
- Collaborate with third-party organizations or auditors for independent verifications.
- Engage stakeholders through training and awareness campaigns.
- Periodically review and update the policy in line with new legal and social developments

7. Related Documents

- Recruitment and Selection Policy
- Supplier Code of Conduct
- Vendor Assessment Checklist
- HR Manual

8. Regulatory or Legal Requirements

- The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 (as amended)
- The Factories Act, 1948
- UN Convention on the Rights of the Child
- ILO Convention No. 138 and No. 182

9. Tools and Resources

- HRMS (for employee document storage and age verification)
- · Legal databases and updates
- Awareness and training materials



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10. Consequences of Non-compliance

- Immediate termination of employment or contract for any violation.
- Blacklisting of vendors found using child labour.
- Legal action as applicable under Indian law.
- Internal disciplinary action for employees or managers involved in violations

11. Training & Communication

- Annual training for HR and recruitment staff on child labour laws and verification processes.
- Regular awareness sessions for all employees and business partners.
- Clearly communicate our child labour policy to all vendors and include appropriate clauses in all agreements.

12. Policy Distribution Method

- Circulated via official company email and posted on internal communication platforms.
- Shared with all suppliers and partners through procurement documentation.

Manorama Industries Limited

