



## SPECTRON

### Child Labour Policy

**Date:** 05.01.2026

**Revision:** 01

**Approved By:** Management

**Applicability:** All eligible employees across functions and locations

#### 1. Purpose

The purpose of this policy is to ensure that the Company strictly prohibits child labour in any form and complies with applicable laws to protect children from exploitation, hazardous work, and denial of education.

#### 2. Scope

This policy applies to:

- All Company operations and workplaces
- All employees, including permanent, contractual, temporary, and trainee staff
- Contractors, vendors, suppliers, service providers, and business partners

#### 3. Policy Statement

The Company maintains **zero tolerance** towards child labour and is committed to:

- Not employing children in violation of applicable laws
- Ensuring ethical and lawful employment practices
- Promoting safe, fair, and humane working conditions

#### 4. Legal Framework

This policy is framed in accordance with:

- **Child and Adolescent Labour (Prohibition and Regulation) Act, 1986**, as amended
- **Factories Act, 1948**
- **Right of Children to Free and Compulsory Education Act, 2009**
- Applicable State labour laws

In case of any conflict, **statutory provisions shall prevail**.

#### 5. Definitions

##### Child

## SPECTRON ENGINEERS PRIVATE LIMITED

An ISO 9001 : 2015 Certified Company

129, Andheri Industrial Estate, Off Veera Desai Road, Andheri (W), Mumbai - 400 053, INDIA

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Spectron Group Of Companies



ISO 9001:2015 Certified



ISO 14001:2015 &  
ISO 45001:2018 Certified

Works : B-18, Additional MIDC Industrial Area, Anand Nagar, Ambernath (E), Dist. Thane - 421506, INDIA

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## SPECTRON

A person who has **not completed 14 years of age**.

### Adolescent

A person who has completed **14 years but not 18 years of age**.

## 6. Prohibition of Child Labour

- The Company **shall not employ or engage** any person below the age of **14 years** in any capacity.
- Employment of children, directly or indirectly, is strictly prohibited.

## 7. Employment of Adolescents

- Adolescents (14–18 years) may be employed **only where permitted by law**.
- Adolescents shall **not** be engaged in:
  - Hazardous occupations or processes
  - Work that may harm health, safety, or morals
- Valid age proof must be verified prior to engagement.

## 8. Age Verification

- The Company shall verify age at the time of recruitment through valid documents such as:
  - Birth certificate
  - Aadhaar card
  - School leaving certificate
  - Government-issued ID

No employment shall commence without proper age verification.

## 9. Contractors, Vendors & Third Parties

- All contractors and vendors must comply with child labour laws.
- Contracts shall include a **child labour prohibition clause**.
- The Company reserves the right to:
  - Audit vendor practices
  - Terminate contracts for non-compliance

## 10. Responsibilities

### Management

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- Ensure compliance with child labour laws
- Enforce this policy across operations

### HR / Administration

- Conduct age verification during hiring
- Maintain employment records
- Monitor compliance

### Employees

- Report any suspected violation of child labour laws
- Cooperate with audits and inspections

## 11. Reporting & Whistleblowing

- Any suspicion or evidence of child labour must be reported immediately to HR or Management.
- Reports may be made confidentially without fear of retaliation.

## 12. Non-Compliance & Disciplinary Action

- Violation of this policy shall result in:
  - Disciplinary action, including termination
  - Legal action as per applicable laws
- Vendors or contractors found violating this policy may face contract termination.

## 13. Awareness & Training

- Awareness may be provided to employees and contractors on child labour laws.
- Recruitment and supervisory staff shall be sensitized on compliance requirements.

## 14. Statutory Compliance

The Company shall fully comply with all statutory obligations related to prevention of child labour. Any inspection, notice, or directive from authorities shall be promptly addressed.

## 15. Policy Review & Amendment

The Company reserves the right to amend, modify, or withdraw this policy in line with changes in law or business requirements.

### Employee–HR Communication on Child Labour Policy

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**Employee:** Does the Company employ children in any capacity?

**HR Representative:** No. The Company strictly prohibits employment of children below 14 years of age in any form.

**Employee:** Can adolescents be employed?

**HR Representative:** Only where permitted by law and never in hazardous work. Proper age verification is mandatory.

**Employee:** What if a contractor uses child labour?

**HR Representative:** That is a serious violation. We take strict action, including contract termination, if any vendor or contractor is found engaging child labour.

**Employee:** Thank you for clarifying.

**HR Representative:** You're welcome. Protecting children's rights is a legal and moral responsibility we take seriously.

Yours Sincerely,

For Spectron Engineers Pvt. Ltd.



**Authorised Signatory**

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