



**Excel Telesonic India Pvt. Ltd.**  
**Anti Child and Anti Forced Labor Policy**


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<b>Prepared By</b>	<b>Environmental Resources Management (ERM)</b>	<b>Reviewed By</b>	<b>Mr. Swapnil Deshmukh</b>
<b>Position</b>	<b>Consultant</b>	<b>Position</b>	<b>WHSE Head</b>
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<b>Approved By</b>	<b>Mr. Kunal Bajaj (CEO)</b>	<b>Approved By</b>	<b>Board of Directors</b>
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## Anti Child Labour Policy

CloudExtel's Policy on Child Labour is our position to empowering minors and aims to ensure that our company, its subsidiaries, and everyone we're connected with follows the law and cares for Children's interests. Our Policy applies to our entire organisation, the contractors, suppliers and others with whom the company have a substantial involvement strongly aware of the standards, which the Company expect from them.

### Definition

Child Labour refers to the work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child labour is a violation of fundamental human rights and has been shown to hinder children's development, potentially leading to lifelong physical or psychological damage.

### Applicable International Labour Organization Standards on Child Labour

#### Minimum Age Convention, 1973 (No. 138)<sup>1</sup>

This fundamental convention sets the general minimum age for admission to employment or work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed.

#### Worst Forms of Child Labour Convention, 1999 (No. 182)<sup>2</sup>


This fundamental convention defines as a "child" a person under 18 years of age. It requires ratifying states to eliminate the worst forms of child labour, including all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; child prostitution and pornography; using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children. The convention requires ratifying states to provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. It also requires states to ensure access to free basic education and, wherever possible and appropriate, vocational training for children removed from the worst forms of child labour.

### Actions and Implementation

- CloudExtel shall ask for undertaking on non-involvement in child labour from our suppliers/ contractors. If in doubt/ as required, the Company will monitor their employment practices through surveys, site visits and audits.

<sup>1</sup> [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100\\_ILO\\_CODE:C138:NO](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C138:NO)

<sup>2</sup> [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100\\_ILO\\_CODE:C182:NO](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C182:NO)

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- CloudExtel may opt for a strategy of constructive engagement with offending suppliers, rather than simply terminating contracts with them. However, if there is no positive impact observed in the employment practices of contractors/ suppliers and others; the Company must terminate the business dealings with such offending suppliers/ contractors; and
- The Amended Act, named as the Child and Adolescent Labour (Prohibition & Regulation) Act, 1986, *inter alia*, “covers complete prohibition on employment or work of children below 14 years of age in all occupations and processes; linking the age of the prohibition of employment with the age for free and compulsory education under Right to Education Act, 2009; prohibition on employment of adolescents (14 to 18 years of age) in hazardous occupations or processes and making stricter punishment for the employers contravening the provisions of the Act.”

## Anti Forced Labour Policy

CloudExtel will uphold the elimination of all forms of forced and compulsory labour.

### Definition

As per the ILO Forced Labour Convention, 1930 (No. 29)<sup>3</sup>, forced or compulsory labour is any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced or compulsory. By right, labour should be freely given, and employees should be free to leave in accordance with established rules. The ILO Forced Labour Protocol (Article 1(3)) explicitly reaffirms this definition.


This definition consists of three elements:

- **Work or service** refers to all types of work occurring in any activity, industry or sector including in the informal economy.
- **Menace of any penalty** refers to a wide range of penalties used to compel someone to work.
- **Involuntariness:** The terms “offered voluntarily” refer to the free and informed consent of a worker to take a job and his or her freedom to leave at any time. This is not the case for example when an employer or recruiter makes false promises so that a worker takes a job he or she would not otherwise have accepted.

### Actions and Implementation

- The Company will not make use of slave, forced or compulsory labour in any form.  
The Company will ensure that employees are free to resign.

<sup>3</sup> [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:::NO:12100:P12100\\_ILO\\_CODE:C029:NO](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:::NO:12100:P12100_ILO_CODE:C029:NO)

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- The Company will ensure that working hours for workers do not exceed the maximum number as per the national law or withhold wages<sup>4</sup>;
- The Company will ensure that the employees will not be subjected to work more overtime than is allowed under national law.
- The Company will ensure the contractors, suppliers and others with whom the company have a substantial involvement strongly aware of the standards, which the Company expect from them.
- The Company shall ask for undertaking on non-involvement in forced labour from our suppliers/ contractors. If in doubt/ as required, Company will monitor their employment practices through surveys, site visits and audits; and
- The Company may opt for a strategy of constructive engagement with offending suppliers, rather than simply terminating contracts with them. However, if there is no positive impact observed in the employment practices of contractors/ suppliers and others; Company must terminate the business dealings with such offending suppliers/ contractors.

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<sup>4</sup> Factories Act, 1948, [https://labour.gov.in/sites/default/files/factories\\_act\\_1948.pdf](https://labour.gov.in/sites/default/files/factories_act_1948.pdf)