

<b>JKSML</b>	<b>JK Sugar Mills (Pvt.) Limited.</b>	DOC# JKSML/Policies/HR/006 Effective Date: June 01, 2021
	<i>Prohibition of Forced Labour Policy</i>	

## **A. POLICY**

- I. JK Sugar Mills (Pvt.) Ltd. does not use involuntary or forced labor – indentured, bonded or otherwise nor does it support the use of forced or compulsory labor in any form including bonded, forced, and/or compulsory prison labor. Forced labour may take different forms: prison labour, coercion, slavery, bonded labour and human trafficking. Menace of penalty can take different form: threats, violence, retention of identity documents, physical confinement (such as imprisonment), denunciation to authorities, non-payment of wage or loss of rights or privilege.
- II. JK Sugar Mills (Pvt.) Ltd. prohibits all relevant individuals from coercing employees in any way or unnecessarily limiting employees’ freedom of movement

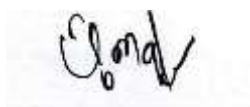
## **B. Scope**

The policy is applicable to all employees (management/non management, permanent, temporary and seasonal) as well as at our registered cane supplying farms.

### **1. Commitments**

There is no financial coercion of employees such as:

- i. Deposits paid by workers upon recruitment.
- ii. Recruitment fees, unless allowed by national law.
- iii. Unfair employment loan terms, or credit, for which workers have to pledge his/her work to repay.
- iv. Unfair purchasing schemes (e.g. in the case of accommodation’s store, no unreasonable pricing, or way to pay for the products, etc.) which is managed directly or indirectly by the employer and which might deprive workers of their financial freedom;
- v. Delays in wage payment such that wage arrears accumulate.
- vi. Deception in the calculation and payment of wages, including unfair wage deductions.
- vii. Wage payment in the form of vouchers, coupons or promissory notes.
- viii. Payment “in-kind” in the form of goods or services that create a dependency on the employer, including absence of total payment of wage “in kind” without cash and only if authorised by national law, regulation or collective agreement.
- ix. The purpose of any security guards posted is for normal security reasons but and not to monitor and control the workforce
- x. Grievance mechanism for employees is in place to present a grievance about abuse, violence and harassment.
- xi. workers are given a copy of their employment contracts



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## 2. Procedure

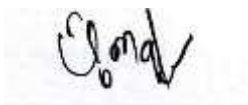
- I. At the time of hiring of employment Management Representative ensures:
  - All employees, original documents are only asked from the employees for the verification of photocopy documents and after verification, original documents will be returned to the employees without holding and incase of registered growers only verify basic document like CNIC.
  - During the time of employee's interview, the potential candidate is briefed about the fact that he/she is under no compulsion to join JKSML and similarly he/she is free to disassociate with JKSML as per his / her own free will according to Terms and Conditions of Employment in accordance with existing law of the Country at any given time but under compliance with the rules as agreed in the appointment letter but all are according to the rules and regulation implemented at the time. Similar terms and conditions are also apply on our registered grower farm.
- II. Management Representative/Farm owner ensures that the workers who are frequently doing overtimes are under no pressure or threat from their respective Departmental Heads/Line managers for compulsory overtime.
- III. In case where any company's and registered grower employee decides to leave JKSML or Farm, HR Manager/Farm owner asks about the reason (s) of leaving/Exit Interview in order to make sure that the person is not leaving under any unlawful compulsion or threat and harassment by the organization concerning (s).
- IV. Management Representative/Farm owner ensures continuous communication between workers and management through Worker's Council; the issues related to the workers are communicated to the management for effective corrective and preventive measures to ensure workers satisfaction.

## 3. Responsible Person

- I. Management Representative/Farm owner is responsible for communicating, deploying and monitoring the Practice of effectively prohibiting involuntary or forced labor.
- II. Proper communication of company's prohibition of forced labor policy to the respective supervisors and workers and all other concern persons. Organizing meetings and training programs to ensure that the policy is properly communicated and understood, the minutes of the meeting are then recorded and circulated to all the participants.

## REVIEW

This policy will be reviewed once within three years, or as required, in order to ensure that the terms are current, fair and representative of relevant corporate and industry laws. The Company reserves the right to change this policy at any time, without prior notice.



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