

<b>JKSML</b>	<b>JK Sugar Mills (Pvt.) Limited.</b>	DOC# JKSML/Policies/HR/002 Revision: 01 Effective Date: May 18, 2026
	<i>Labor Right Policy</i>	

**Policy Statement:**

JK Sugar Mills (Unit-1) is committed to upholding the fundamental rights of all workers, ensuring a fair, safe and healthy working environment, in compliance with national labor laws and international standards. This policy is designed to protect workers' rights in areas such as employment age, wages, working hours, overtime, union freedom and workplace health and safety. We believe in the dignity of every worker and promote fairness and respect in all employment practices.

**Scope**

This policy applies to all permanent, temporary, contractual employees at JK Sugar Mills (Unit-1) and registered cane-supplying farms. This policy also covers all work-related operations, including mill sites, farms, and catchment areas where the mill manages activities.

**Key Principles & Commitments**

**Minimum Age of Employment:**

- The Company does not and will not engage in or support the use of child labor. JKSML does not and shall not employ any person of the age below 18 years in any of its departments as defined in laws and regulations. The Company respects and supports children’s rights consistent with the United Nations Convention on the Rights of the Child and the Conventions of International Labor Organizations. Applicants must establish a National Identity Card, without which any kind of employment offer will not be made.
- JK Sugar Mills (Pvt.) Ltd. does not support the use of Child Labor below 18 years of age nor does it allow child workers to be employed by any of its suppliers or any others involved with JKSML business.
- For young workers above the legal minimum working age but below 18, and for legal apprenticeships, there are restrictions on hours of work and overtime, working at dangerous heights, with dangerous machinery, equipment and tools, transport of heavy loads, exposure to hazardous substances or processes, and difficult conditions such as night work are prohibited.
- National laws or regulations may permit the employment or work of persons 13 to 15 years of age on light work which is:

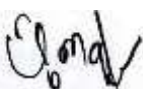
(a) not likely to be harmful to their health or development; and

(b) not such as to prejudice their attendance at school, their participation in vocational orientation or training programmes approved by the competent authority or their capacity to benefit from the instruction received.


- JK Sugar Mills (Pvt.) Ltd. will discontinue business relations with such supplier who use Child Labor or continued to do so even after insistence by Company for remediation of child labor.

**2. Equal Opportunity and Non-Discrimination:**

JK Sugar Mills fosters an inclusive workplace where employees are selected based on their skills and potential, without discrimination based on race, colour, gender identity, age, language, religion, property/ wealth, nationality, ethnic/social origin, caste, disability, pregnancy, indigeneity, union affiliation, political affiliation, marital/family status, personal relationships, health status, sexual orientation or other non-valid reasons that are irrelevant to the skills, capabilities, qualities and medical fitness for the job.. Equal opportunity is a core value, and the Company ensures that all hiring and promotion decisions are fair and unbiased.



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**3. Minimum Wages:**

JK Sugar Mills ensures that all employees are paid at least the minimum wage as stipulated by local labor laws. For workers on piece rates, the wage will be calculated to ensure that no worker earns less than the prescribed minimum wage. Employees will also receive overtime payments where applicable, in accordance with labor regulations.

**4. Working Hours and Overtime:**

JK Sugar Mills complies with local legislation regarding working hours. The standard working hours at the mill and at registered farms are as follows:

**Working Hour Structure:**

**I. Head office**

Monday to Friday	09:00 AM - 05:00 PM
Lunch & Prayer Time	01:00PM - 02:00PM
Saturday & Sunday	Rest Day

**II. At Site During Off Season:**

**a. General Shift:**

Monday to Saturday:	07:00 AM	to	03:00 PM
Lunch & Prayer Time:	01:00 PM	to	02:00 PM
Sunday	Rest Day		

**b. (Security & Safety Department)**

Shift A	06:30 AM	to	02:30 PM
Shift B	02:30 PM	to	10:30 PM
Shift C	10:30 PM	to	06:30 AM

**III. At Site During Season:**

**a. General Shift**

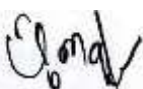
Monday to Saturday:	08:00 AM	to	04:00 PM
Sunday:	Rest Day		
Lunch & Prayer Time for General Shift:	01:00 PM	to	02:00 PM
Shift A	12:00 AM	to	08:00 AM
Shift B	08:00 AM	to	04:00 PM
Shift C	04:00 PM	to	12:00 AM

**IV. At Registered Farms**


8 hours a day with 1 day rest in a week or 2 days rest in 14 days

**5. Overtime Structure**

- Employees are required to adhere to the established working hours, and overtime is to be approved by the respective Head of Department.
- Overtime is voluntary but can be authorized during peak production or emergency situations. Overtime will be compensated at a premium rate of 100% of the basic salary. Any overtime worked beyond 60 hours per month will require justification from the department head.
- Overtime payments will be based on actual hours worked beyond the regular 48-hour workweek.



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- Employees should not work more than 4 consecutive hours of overtime in any given day, and overtime should not be scheduled for non-urgent work.
- Overtime is paid on time spent at work for more than 48 Hours per week.
- If any employee reports 30 minutes late after their duty start time, it will be considered a late arrival. A maximum of three (3) relaxations will be allowed in a month. If an employee is late more than three times, it will be counted as half-day attendance.

**Payment Method:**

Permanent & Seasonal Staff:                      08 Hours                      =01 Day  
Daily Wages Staff:                                      Gross Salary / 26/ 8 x Total Earned Hours

**6. Mode of Payment:**

Payments to all permanent and retaineer staff will be made through bank transfer. Daily wage staff will be paid in cash by the mill's Accounts Department between the 1st to 4th of each month, after the month closing. Overtime payments for all staff (Permanent, daily and retaineer) will also be disbursed in cash by the Accounts Department after the monthly closing.

**7. Health and Safety:**

The health and safety of employees are a top priority at JK Sugar Mills. The Company ensures that all workplaces comply with local and international health and safety standards. Workers are required to follow health and safety guidelines, use necessary personal protective equipment (PPE), and report unsafe conditions immediately. Employees should only perform tasks they are trained for and deemed fit to do.

- All workers must comply with training in health and safety relevant to their roles.
- Incidents, accidents, and near misses must be reported promptly for investigation and corrective action.
- All employees, including contractors and visitors, will be familiar with emergency procedures at the worksite.

**8. Freedom of Association and Collective Bargaining:**

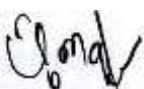
JK Sugar Mills supports employees' rights to join a worker's association or union and engage in collective bargaining. Workers are encouraged to voice their concerns and have a collective say in the workplace. The Company does not discriminate against union members or activities and respects the right to peaceful assembly and dialogue between workers and management.

**9. Employee Health and Welfare:**


The Company provides adequate welfare services, including access to health services and a safe working environment. Measures are in place to protect workers from physical and mental health risks, and any conditions affecting a worker's health or ability to work will be addressed promptly to prevent further risks. Regular health and safety audits will be conducted, and workers will be provided with the necessary training to ensure their well-being.

**10. Termination and Disciplinary Action:**

JK Sugar Mills adheres to national labor laws with respect to the termination of employees. The Company ensures that termination procedures are fair, transparent, and comply with relevant laws. Employees have the right to raise concerns regarding any perceived unfair treatment or dismissal.



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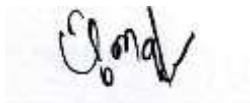


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**Review**

This policy will be reviewed every three years, or as required, to ensure compliance with changing labor laws and industry standards. The Company reserves the right to amend or update this policy without prior notice, subject to applicable laws.



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