

ASHOKA CATTLE AND POULTRY FEEDS LIMITED

LABOUR LAWS COMPLIANCE AND WORKPLACE SAFETY REGULATIONS POLICY

1. Preamble and Scope

Ashoka Cattle and Poultry Feeds Limited (hereinafter referred to as "the Company") is engaged in the manufacture, processing, and distribution of cattle and poultry feed products from its facility having its head office at Darbhanga, Bihar. In keeping with its commitment to responsible corporate conduct, lawful employment practices, and the welfare of all persons associated with the Company, this Policy has been framed to consolidate the Company's obligations under applicable Indian labour legislation and occupational health and safety standards.

This Policy applies to:

- All permanent, contractual, casual, and apprentice employees engaged at the Company's factory premises, administrative offices, warehouses, and distribution points.
- Labour engaged through contractors or third-party service providers working on the Company's premises.
- Trainees, interns, and persons engaged under any government-sponsored skill development scheme.

The Company recognises that a safe, fair, and dignified working environment is both a legal obligation and a foundational element of sustainable business operations.

2. Governing Legislation and Regulatory Framework

The following principal statutes, rules, and notifications form the legal basis of this Policy. The list is indicative and shall be read to include all amendments, rules, and notifications issued thereunder from time to time:

2.1 Central Labour Legislation

Legislation	Key Provisions Covered	Applicability
Factories Act, 1948	Health, safety, welfare, working hours, hazardous processes	All factory workers
Employees' Provident Funds & Misc. Provisions Act, 1952	PF, Pension (EPS), EDLI contributions	Establishments with 20+ employees
Employees' State Insurance Act, 1948	Medical, sickness, maternity, disablement benefits	Employees with wages up to ESI wage ceiling
Minimum Wages Act, 1948	Scheduled employment minimum wage rates	All categories of workers
Payment of Wages Act, 1936	Timely wage payment, deduction limits	Employees up to prescribed wage ceiling

Legislation	Key Provisions Covered	Applicability
Payment of Bonus Act, 1965	Annual bonus payment obligations	Employees up to ₹21,000/month wages
Payment of Gratuity Act, 1972	Gratuity on cessation of employment (5 years)	All employees in scheduled establishments
Contract Labour (Regulation & Abolition) Act, 1970	Licensing, registration of contractors	If contract labour engaged
Workmen's Compensation Act, 1923 (now Employees' Compensation Act)	Compensation for injury/death by accident	All non-ESI eligible workers
Maternity Benefit Act, 1961	Maternity leave (26 weeks), nursing breaks	All women employees
Industrial Disputes Act, 1947	Dispute resolution, retrenchment, layoff	Industrial establishments
Equal Remuneration Act, 1976	Equal pay for equal work, non-discrimination	All employees
Child & Adolescent Labour (Prohibition) Act, 1986	Prohibition of employment of minors	All establishments
Code on Wages, 2019 (as notified)	Unified wage code, minimum wage, bonus, payment	Upon full notification
POSH Act, 2013 (Sexual Harassment of Women at Workplace)	ICC constitution, complaint mechanism	Establishments with 10+ employees

2.2 Bihar State Legislation

- Bihar Shops and Establishments Act (as applicable)
- Bihar Factories Rules, 1950 and amendments
- Minimum Wages notifications issued by the Government of Bihar for the scheduled employment of "Flour, Dal & Rice Mills" and related manufacturing industries
- Bihar Building and Other Construction Workers (Regulation of Employment & Conditions of Service) Act (where applicable)

3. Employment Practices and Conditions of Service

3.1 Recruitment and Appointment

The Company shall adhere to the following standards in recruitment and appointment:

- No person below the age of 18 years shall be employed in any capacity. Proof of age (Aadhaar, birth certificate, or matriculation certificate) shall be obtained and retained on personnel file.
- Adolescents between 15 and 18 years shall not be permitted to work in any hazardous area, machinery operation, or night shift, in strict compliance with the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986.
- Each employee shall receive a formal Letter of Appointment setting out designation, department, date of joining, place of work, remuneration, and applicable service conditions.
- Employment of women shall not be subject to any discriminatory conditions. Women shall be eligible for all positions unless otherwise restricted by law.

3.2 Working Hours, Overtime, and Leave

In compliance with the Factories Act, 1948 and applicable Bihar rules:

- Ordinary working hours shall not exceed 9 hours per day and 48 hours per week.
- Total working hours including overtime shall not exceed 60 hours per week and 50 hours in a quarter for overtime.
- Overtime shall be paid at twice the ordinary rate of wages.
- Every worker shall be entitled to one weekly rest day (typically Sunday), which shall not be changed more than once in three months.
- Workers shall be entitled to annual leave with wages at the rate of one day for every 20 days of work performed during the preceding calendar year (Factories Act, 1948, Section 79).
- Casual leave, sick leave, and earned leave shall be governed by the Company's Service Rules, subject to minimum statutory entitlements.

3.3 Wages and Remuneration

- Wages shall be paid at intervals not exceeding one month and in any case before the 7th day (or 10th day for establishments with 1,000+ workers) of the following month.
- The Company shall ensure that no employee is paid below the minimum wages notified by the Government of Bihar for the relevant category of employment.
- Wages shall be paid by bank transfer (NEFT/RTGS/IMPS/UPI) to promote transparency and traceable payment records.
- Authorised deductions from wages shall not exceed the limits prescribed under the Payment of Wages Act, 1936. Deductions for damage or loss shall require prior inquiry.
- Full and final settlement of dues upon separation shall be completed within 30 days of the date of cessation of employment.

3.4 Contract Labour

- The Company shall obtain a Certificate of Registration under the Contract Labour (Regulation & Abolition) Act, 1970 wherever the threshold of engagement is met.
- Every contractor shall hold a valid licence and shall comply with all wage payment, ESI, PF, and welfare obligations towards their workers.
- The Company shall maintain a register of contractors and conduct periodic verification of licence validity and statutory compliance.
- In the event of default by a contractor in payment of wages or statutory contributions, the Company may discharge such obligations and recover the same from the contractor.

4. Social Security and Employee Benefits

4.1 Employees' Provident Fund (EPF)

- The Company shall register under the Employees' Provident Funds and Miscellaneous Provisions Act, 1952 and ensure that both employer (12% of basic wages) and employee (12%) contributions are deposited by the 15th of every succeeding month.
- Universal Account Numbers (UAN) shall be generated and activated for all covered employees. KYC seeding of Aadhaar, PAN, and bank account shall be ensured.
- The Company shall file monthly ECR (Electronic Challan cum Return) on the EPFO portal within the prescribed timeline.

4.2 Employees' State Insurance (ESI)

- All employees drawing wages up to the notified ESI wage ceiling and employed at the factory shall be covered under the ESI Act, 1948.
- ESI contributions (currently 3.25% — employer; 0.75% — employee) shall be remitted on or before the 15th of the following month.
- Employer shall ensure issuance of ESI cards / IP numbers to all covered employees and their dependants.
- In respect of workers not covered under ESI (wages above ceiling), the Company shall maintain adequate coverage under the Employees' Compensation Act, 1923 or Group Accident Insurance as appropriate.

4.3 Gratuity

- Every employee who has rendered five years of continuous service shall be entitled to gratuity at the rate of 15 days' wages for each completed year of service, subject to the ceiling under the Payment of Gratuity Act, 1972.
- The Company shall maintain a group gratuity fund or make actuarial provisions for gratuity liability.

4.4 Bonus

- Eligible employees shall receive annual bonus in accordance with the Payment of Bonus Act, 1965, at the minimum statutory rate (8.33%) and up to a maximum of 20%, based on the Company's allocable surplus.
- Bonus shall be paid within eight months of the close of the accounting year, or within one month of the expiry of the said eight months if a dispute is pending.

4.5 Maternity Benefits

- Women employees shall be entitled to 26 weeks of paid maternity leave (first two deliveries) in accordance with the Maternity Benefit Act, 1961.
- The Company shall not discharge or dismiss any woman employee during her absence on maternity leave.
- Nursing breaks (two breaks of 15 minutes each per day until the child is 15 months old) shall be provided.
- Establishments with 50 or more employees shall make provisions for crèche facilities under Section 11A of the Act.

5. Occupational Health and Safety

The Company operates a manufacturing facility involving the handling, processing, and storage of raw materials and finished feed products. Given the nature of operations — including dust generation, machinery operation, storage of grain-based materials, and potential rodent/pest control activities — occupational health and safety compliance is of paramount importance.

5.1 Factory Compliance under the Factories Act, 1948

- The factory premises shall be duly registered and the Occupier and Manager appointed in accordance with Sections 6 and 7 of the Factories Act, 1948.
- Annual returns (Form 21) and half-yearly returns (Form 22) shall be submitted to the Inspector of Factories, Bihar, within prescribed timelines.
- The Company shall maintain an up-to-date register of adult workers (Form 12), register of child workers (nil register), leave register (Form 15 & 16), and overtime register (Form 10).

5.2 Premises, Cleanliness, and Environment

- The factory premises shall be kept clean and free of effluvia arising from drains, privies, or other sources. Floors shall be cleaned at least once every week (Factories Act, Section 11).
- Adequate ventilation and temperature control shall be maintained in all workrooms. Cooling measures shall be employed in areas where processes generate excessive heat.
- Effective and suitable provision shall be made for the disposal of dust, fumes, and other impurities generated during the manufacturing process (Section 14). Feed dust suppression measures shall be implemented at grinding and mixing stations.
- Artificial humidification, where employed, shall use clean water and be subject to periodic inspection.

5.3 Machinery and Equipment Safety

- All dangerous parts of machinery shall be securely fenced (Sections 21–27, Factories Act). Prime movers, transmission machinery, and other dangerous machinery shall be guarded at all times during operation.
- No employee shall be permitted to clean, lubricate, or adjust any moving part of a machine unless trained and authorised to do so.
- Hoist and lift equipment shall be of good mechanical construction and thoroughly examined by a competent person every six months.
- Pressure vessels, steam pipes, boilers (if any), and pneumatic equipment shall be maintained in compliance with relevant codes and subjected to periodic statutory inspection.
- A permit-to-work system shall be implemented for all high-risk maintenance activities including confined space entry, electrical work, and work at height.

5.4 Fire Safety

- The factory shall be equipped with adequate fire-fighting equipment (extinguishers, sand buckets, hose reels) as per the Bihar Fire Service Act requirements and the Factories Act.
- Clearly marked fire exits, evacuation plans, and assembly points shall be maintained and communicated to all employees.
- Fire drills shall be conducted at least twice a year. Records shall be maintained.
- Storage of flammable substances (lubricants, cleaning agents) shall be in designated, ventilated, clearly labelled stores away from production areas.

5.5 Electrical Safety

- All electrical installations shall comply with the Indian Electricity Rules, 2005 and relevant Indian Standards.
- Periodic inspection and testing of electrical systems shall be carried out by a qualified electrician and records maintained.
- Isolation and lock-out/tag-out (LOTO) procedures shall be enforced during maintenance or repair of electrical equipment.

5.6 Dust and Air Quality

Feed manufacturing generates particulate matter (grain dust) which is combustible and poses respiratory hazards. The Company shall:

- Install and maintain adequate dust extraction and collection systems at all grinding, milling, and mixing points.
- Conduct periodic air quality monitoring within the factory premises.
- Ensure that workers engaged in dusty operations are provided appropriate respiratory protection (N95 or higher grade respirators).
- Maintain housekeeping standards that prevent accumulation of combustible dust, particularly on elevated surfaces and electrical fittings.

5.7 Personal Protective Equipment (PPE)

The Company shall provide appropriate PPE free of cost to all workers in accordance with the nature of their tasks. Minimum PPE requirements by work area:

Work Area / Activity	Minimum PPE Required	Additional as assessed
Feed grinding / milling	Dust mask (N95), safety goggles, hearing protection, safety shoes	Coveralls
Feed mixing / batching	Dust mask, gloves, safety shoes	Apron, goggles
Raw material handling	Safety shoes, gloves, back support belt	Dust mask
Electrical maintenance	Insulating gloves, safety shoes, face shield	Helmet, LOTO devices
Machinery maintenance	Safety glasses, gloves, safety shoes	Hard hat, coveralls
Chemical/disinfectant handling	Chemical-resistant gloves, goggles, face shield	Apron, respirator
Loading / unloading / warehousing	Safety shoes, gloves	Hard hat, reflective vest
Office and administrative	No specific PPE	—

Employees shall be trained on the correct donning, doffing, maintenance, and storage of PPE. Non-compliance with PPE usage shall be subject to disciplinary action.

5.8 Welfare Facilities

In compliance with Chapter V of the Factories Act, 1948, the following shall be provided and maintained:

- Adequate supply of clean drinking water, conveniently accessible to all workers (Section 18).
- Sufficient number of latrines and urinals, separately for male and female workers, maintained in clean and sanitary condition (Section 19).
- Spittoons at convenient places with appropriate disinfectant liquid (Section 20).
- Adequate washing facilities including clean running water (Section 42).
- First-aid boxes/cupboards — one per 150 workers — stocked as per the First Aid Rules and maintained under the charge of a trained first-aider (Section 45).
- A canteen (if 250+ workers are ordinarily employed) meeting the standards prescribed under the Factories (Canteen) Rules.
- Shelters, rest rooms, and lunch rooms (if 150+ workers) for workers during rest intervals (Section 47).

5.9 Occupational Health

- Compulsory pre-employment and annual periodic medical examination shall be conducted for all workers employed in operations involving dust exposure, chemical handling, or any scheduled hazardous process.
- Records of medical examinations shall be maintained and workers found medically unfit for specific tasks shall be redeployed appropriately.
- The Company shall maintain a First Aid Room (if employing 500+ workers) with a qualified nurse and necessary medical supplies.
- A Safety Officer shall be appointed as required under Section 40B of the Factories Act (applicable when 1,000+ workers are ordinarily employed); for smaller establishments, a designated Safety In-charge shall be appointed.

6. Accident Reporting, Emergency Response, and Compensation

6.1 Incident / Accident Reporting

- All accidents, near-miss incidents, and occupational diseases shall be reported to the Safety In-charge immediately.
- Accidents causing death or bodily injury requiring more than 48 hours of hospitalisation shall be reported to the Inspector of Factories within the prescribed timeframe (Factories Act, Section 88, Form 20).
- An internal investigation shall be conducted for every reported accident to identify root causes and implement corrective action.
- The Company shall maintain an Accident Register and Injury Register as required.

6.2 Emergency Response Plan

The Company shall maintain a documented Emergency Response Plan (ERP) covering:

- Fire and explosion response procedures.
- Chemical/dust spillage and inhalation emergencies.
- Electrical emergency procedures.
- Medical emergency and first aid protocols.
- Evacuation procedures and assembly point designation.
- Contact details of nearest hospital (Government Hospital, Darbhanga; DMCH), fire station, police station, and ambulance services.

Important: The Darbhanga Medical College and Hospital (DMCH) shall be designated as the primary emergency healthcare referral. First aid training shall be provided to at least 5% of the workforce.

6.3 Workmen's Compensation

- In cases not covered under ESI, compensation for employment injury or occupational disease shall be paid in accordance with the Employees' Compensation Act, 1923.

- The Company shall maintain a valid Group Personal Accident Insurance policy providing coverage for all workers not covered under ESI.
- Compensation claims shall be processed promptly and with compassion; no undue delay or harassment of affected workers or their families shall be tolerated.

7. Prevention of Sexual Harassment at Workplace (POSH)

The Company is committed to providing a safe and dignified working environment for all employees, especially women. In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

- An Internal Complaints Committee (ICC) shall be constituted, chaired by a senior woman employee, with at least half the members being women and including one external member from an NGO or legal background.
- The POSH Policy, along with the names and contact details of ICC members, shall be prominently displayed at the workplace.
- The ICC shall meet at least once per quarter and submit an annual report to the employer and the District Officer.
- All employees shall undergo mandatory POSH awareness training at the time of onboarding and at least annually thereafter.
- Any complaint of sexual harassment shall be inquired into within 90 days of receipt. The complainant shall be protected from retaliation, and confidentiality shall be maintained throughout the process.
- The Company shall submit an annual return on POSH compliance to the jurisdictional authority.

8. Industrial Relations and Grievance Redressal

8.1 Workers' Participation

- The Company shall encourage formation of a Works Committee (mandatory in establishments employing 100+ workers) to promote cooperation between management and workers on matters of common interest (Industrial Disputes Act, 1947, Section 3).
- Workers' views on safety, welfare, and working conditions shall be sought through periodic meetings, suggestion boxes, and open-door communication.

8.2 Grievance Mechanism

- Every worker shall have the right to register a grievance without fear of victimisation.
- A formal Grievance Redressal Procedure shall be maintained, ensuring first-level resolution within 7 working days and escalation to senior management within 14 days if unresolved.
- A designated HR contact or Grievance Officer shall be identified and their details prominently displayed.

8.3 Disciplinary Procedure

- No employee shall be dismissed, discharged, or subjected to major punishment without following the principles of natural justice — written charge sheet, opportunity to respond, and a fair enquiry.
- Minor misconduct shall be dealt with progressively through verbal warning, written warning, and suspension before dismissal.
- The Company shall maintain a Standing Orders document governing conditions of employment and disciplinary rules (applicable if employing 50+ workers under the Industrial Employment (Standing Orders) Act, 1946).

9. Training, Awareness, and Capacity Building

The Company recognises that effective implementation of this Policy depends on building knowledge and awareness among all personnel. The following training calendar shall be maintained:

Training Area	Target Audience	Frequency
Induction / Onboarding — Labour Laws & Safety Overview	All new joiners	At time of joining (within first week)
Safe machine operation and lock-out/tag-out (LOTO)	Machine operators, maintenance staff	Annual + upon any equipment change
Fire safety and evacuation drill	All employees	Twice yearly (April & October)
First aid and emergency response	Designated first-aiders (at least 5% of workforce)	Annual recertification
PPE usage, maintenance, and disposal	All production and warehouse staff	Annual + when new PPE introduced
POSH — Prevention of Sexual Harassment	All employees	Annual mandatory training
Hazardous materials and chemical handling	Chemical store and pest-control staff	Annual
Supervisory / managerial EHS responsibilities	Department heads, supervisors	Bi-annual

10. Statutory Registers, Returns, and Record-Keeping

The Company shall maintain the following registers, records, and returns in compliance with applicable law:

Register / Return / Notice	Applicable Law	Frequency / Deadline
Register of Adult Workers (Form 12)	Factories Act, 1948	Perpetual / updated continuously
Register of Leaves with Wages (Form 15 & 16)	Factories Act, 1948	Perpetual
Register of Overtime (Form 10)	Factories Act, 1948	Monthly
Annual Return (Form 21)	Factories Act, 1948	By 31st January each year
Half-Yearly Return (Form 22)	Factories Act, 1948	31st July & 31st January
Accident Register (Form 26)	Factories Act, 1948	As and when applicable
Muster Roll / Attendance Register	Contract Labour Act; Minimum Wages Act	Daily
Wage Register	Payment of Wages Act / Minimum Wages Act	Monthly
PF Monthly Challan and ECR	EPF Act, 1952	By 15th of next month
ESI Monthly Challan	ESI Act, 1948	By 15th of next month
ESI Half-Yearly Return	ESI Act, 1948	May 11 & November 11
Gratuity Notice to employees (Form U)	Payment of Gratuity Act, 1972	On appointment
Bonus Register (Form A, B, C, D)	Payment of Bonus Act, 1965	Annual
POSH Annual Report to District Officer	POSH Act, 2013	Annual (by 31st January)
Form II — Maternity Benefit	Maternity Benefit Act, 1961	On claim

11. Compliance Monitoring, Audit, and Review

- A half-yearly internal compliance audit shall be conducted by the HR/Compliance function covering all areas of this Policy.
- The Company's statutory auditors, internal auditors, and/or external consultants may be engaged to conduct an independent review of labour law compliance at least once annually.
- Any deviations, non-compliances, or pending actions identified during audit shall be reported to the Managing Director and addressed with a defined corrective action plan and timeline.
- This Policy shall be reviewed annually or upon any significant change in applicable law, workforce size, or business operations, whichever is earlier.
- The revised policy shall be approved by the Board of Directors and communicated to all employees.

12. Non-Compliance and Disciplinary Consequences

Violations of this Policy by employees at any level — whether by commission or omission — shall be subject to appropriate disciplinary action, including:

- Verbal or written warning (minor lapses).
- Suspension from duty pending inquiry.
- Termination of employment (serious or repeated violations).
- Referral to appropriate law enforcement authorities in cases of cognisable offence.

Any manager or supervisor found to have knowingly tolerated, concealed, or facilitated non-compliance shall face enhanced consequences. A culture of accountability is expected at every level of the organisation.

13. Declaration and Acknowledgement

Ashoka Cattle and Poultry Feeds Limited is committed to upholding the letter and spirit of all applicable labour laws and safety regulations. This Policy has been adopted by the Board of Directors and is effective from June 2025. All employees, contractors, and associated persons are expected to familiarise themselves with its contents and adhere to its provisions.

Disclosure: This Policy document shall be made available at the Factory Office, HR Notice Board, and the Company's internal intranet (if any). Employees may request a copy from the HR department at any time.

<p>Authorised Signatory For and on behalf of Ashoka Cattle and Poultry Feeds Limited</p> <hr/> <p>Signature & Designation</p>	<p>Place: Darbhanga, Bihar</p> <p>Date: _____</p> <p>Seal: _____</p>
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