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Policy

Working Conditions & Living Wages

Policy Title	Working Conditions and Living Wages
Employee Value Proposition	Guideline and General Principles of conducts for employees
Applicability	This policy is applicable to all employees across Rubamin and its subsidiary Companies
Originator and Contact Information	Human Resource (hrd@rubamin.com)
Effective Date	September 1, 2023
Prepared By	Human Resources Department
Approved By	Group Human Resources – Head 

The Board of Directors of Rubamin (the “Company”) has the power to design, assess and continuously revise the Governance and Sustainability System, and specifically to approve and update the corporate policies, which contain the guidelines governing the conduct of the Company and of the companies belonging to the group of which the Company is the controlling entity, within the meaning established by law (the “Group”). In fulfilling these responsibilities, and aware of its commitment to the social aspects generally and to improvement of working conditions and wages for the company’s employees specifically, the Company hereby approves this Policy on Working Conditions (the “Policy”) pursuant to the provisions of the Purpose and Values of the Rubamin Group.

1. Purpose

As a responsible recycler, Rubamin supports the transition towards a more prosperous, sustainable, and resilient ecosystem. This implies considering the environmental, social and governance impacts in every decision that is made.

The success of Rubamin’s business comes from the accomplishments and well-being of its employees. Rubamin’s goal is to build a workplace culture that fosters leaders and allows every person to thrive, contribute and grow. This policy reflects the commitment to provide all employees all over the locations with good working conditions, a safe and healthy work environment, and flexible employment possibilities that support a better work-life balance.

This Working Conditions Policy lies under the General Human Capital Policy and further develops the commitment stated on it related to this matter.

In addition, this policy is aligned with the 2030 Agenda and the Sustainable Development Goals (SDG) and specifically with *SDG3*: “Ensure healthy lives and promote well-being for all at all ages”, *SDG8*: “Promote sustained inclusive and sustainable economic growth, full and productive employment and decent work for all” and *SDG10*: “Reduce inequality within and among countries”.

2. Scope of Application

This Policy applies to all companies of the Rubamin Group in India, as well as to all entities not belonging to the Group but over which the Company has effective control, within the limits established by law.

Without prejudice to the provisions of the preceding paragraph, all companies of the Group and their subsidiaries, based on their own special framework of strengthened autonomy, may establish an equivalent policy, which must be in accord with the principles set forth in this Policy and in the other

environmental, social and corporate governance and regulatory compliance policies of the Governance and Sustainability System. This Policy shall also apply, to the extent relevant, to the joint ventures, temporary joint ventures and other equivalent associations, if the Company assumes the management thereof.

3. Commitments

The Group is committed to:

- Respect, promote and fulfil the four fundamental rights in the eight International Labour Organization (ILO) core conventions as set out in the Declaration on Fundamental Principles and Rights at Work. This includes:
 - Freedom of association and effective recognition of the right to collective bargaining.
 - Elimination of all forms of forced or obligatory Labour.
 - Effective abolition of child Labour.
 - Elimination of discrimination in employment and occupation.
- Align with relevant ILO conventions related to the specific issues covered in this policy.

3.1 Working Time

The Group is committed to:

- Ensure decent working hours in compliance with all local laws applicable for working hours and overtime. Overtime shall not be excessive, do not be regular, and remain voluntary and always compensated, in compliance with applicable regulations & laws.
- Paid national and religious holidays for all employees. Additional days off during important events (marriage, birth, and death of relatives) are provided.
- Provide its employees with annual paid holidays.
- Ensure adapted working conditions whenever possible to encourage employees to have outside interests, especially community involvement.
- Implement gradually work-life balance initiatives among its own employees.
- Increase gradually the wages to reach the Living Wages Benchmarks as published < <https://globallivingwage.org/countries/india/> >.
- Encourage employees to volunteer and contribute to Rubamin CSR initiative of corporate volunteering and skills sponsorship.

3.2 Physical & Mental Working Conditions

The Group is committed to:

- Protect the safety and health of all Rubamin's direct and indirect workers by preventing work-related injuries, ill health, diseases and incidents.
- Comply with relevant Occupational Health & Safety (OH&S) national laws and regulations, applicable international norms ' including but not limited to ILO conventions on OHS ' voluntary programs, collective agreements on OHS and other requirements to which Rubamin subscribes.
- Ensure that workers and their representatives are consulted and encouraged to participate actively in all elements of the OH&S Management system.
- Continually improve the performance of the OH&S Management system in line with the best available standards ISO 45001 and develop customized framework to ensure a healthy workplace and workers.
- Promote a workplace environment that supports and encourages the mental well-being of all employees.

To find out more about the Occupational Health & Safety Policy, consult Rubamin's website <<https://www.rubamin.com/>>

3.3 Remuneration

The Group is committed to:

- Ensure a competitive and consistent compensation system across all locations, considering applicable collective agreements.
- Define remuneration equally and not tolerate any discrimination related to origin, nationality, religion, race, gender, disability or age.
- Employees who individually and/or collectively and extensively contribute to the development and the success of the company, should be able to benefit from this through any kind of compensation and/or benefits in a transparent and standardized manner. Rubamin is committed to provide them with a fixed remuneration considering the level of responsibility, role specific competence, experience, degrees and market conditions, which is reviewed annually according to the evolution of the level of control, the employee potential, and market evolutions. The fixed remuneration is completed by a variable remuneration linked to the individual and collective performance. Individual performance variable compensation programs are linked to

company and/or individual performance to retribute and recognize individual contributions.

- Ensure that part-time workers receive the same protection, basic wage and social security, as well as employment conditions equivalent to those agreed to comparable full-time workers.

3.4 Personal Data Protection

The Group is committed to:

- Responsibly, fairly and transparently collect, use, and disclose personal data (any information that relates to an individual who can be directly or indirectly identified) of employees, in line with the applicable laws, standards and norms.
- Process data for the legitimate purposes specified explicitly to the data subject when Rubamin collected it.
- Collect and process only as much data as necessary for the purposes specified. Personal data is mainly used for human resources, IT, occupational health & safety, labour relations, infrastructure management and audits.
- Keep personal data accurate and up to date.
- Store personally identifying data for as long as necessary for the specified purpose.
- Use reasonable organizational, technical, and administrative measures to the protect personal data under its control.
- Allow employees to exercise rights under applicable data protection laws such as the right to be informed, the right to access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability, the right to object and rights in relation to automated decision making and profiling through the HR Portal "ABHYUDAY " or the HR entities.

3.5 Retirement

The Group is committed to:

- Guarantee competitive pension schemes as per the prevailing statutory laws in India.
- Offer to any Rubamin Group retiree the opportunity to join existing mentoring programs to transfer their knowledge, know-how and expertise to the new generations.

4. Implementation

Rubamin Group will transversally engage the relevant departments to ensure the implementation of these commitments and to communicate this policy to its employees and interested external stakeholders.

1. Reporting

Rubamin Group will monitor and report, whenever it is possible, on a regular basis various Labour KPIs related to the related issues covered along this policy ' health & safety, remuneration and freedom of association, among others ' mainly using the related GRI standards.

Policy on Living Wages

Policy statement

Rubamin recognizes that recompense for work should allow those working to a decent standard of living without dependence on outside subsidies.

Principles underlying this policy.

A living wage is one which allows individuals to meet their everyday needs to a basic but decent standard. 'Everyday needs' means essentials such as food, housing and utilities, with a margin for unforeseen events such as the replacement of white goods. It is based on living costs. The living wage is distinct from the National Minimum Wage, which is based on median national income, and as such allows individuals to live without other subsidies such as those provided by the Government or charities.

Rubamin comes into contact with those working for a wage directly through employment and sub-contracting and indirectly through procurement and collaboration.

Aims, objectives and scope of this policy

- Rubamin will pay employees a living wage, based on the local cost of living for the employee or subcontractor.
- Rubamin will be transparent about its wage-setting policies. It will encourage employees to raise concerns about their wages and expenses and will handle those concerns in an open and non-discriminatory way.
- Rubamin will encourage other organisations it works with to pay their employees a living wage, and will consider whether suppliers pay a living wage when procuring goods and services

- The Executive Directors of Rubamin has responsibility for ensuring that a living wage is paid to direct employees. Anyone within the organisation who is managing a sub-contractor has responsibility for ensuring that sub-contractors are paid a living wage.
- Anyone within the organisation involved in procurement has a responsibility to consider the living wage as an element in their decision-making.

Procedures

The living wage benchmark used will be available at <
<https://globallivingwage.org/countries/india/> >.

When reviewing wages and salaries, the Chief Executive or person managing a sub-contractor will consider the living wage to be the floor an individual will be paid.

Employees and subcontractors will be encouraged to be aware of the current level of the living wage and raise concerns with the Chief Executive or person managing them. When a concern is raised, it should be investigated. Where the concern is justified the wage, salary or sub-contractor's fee will be adjusted to meet the living wage.

When procuring, those within Rubamin will look for evidence that a potential supplier is paying the living wage, and consider payment of the living wage alongside other considerations when choosing a supplier.

Rubamin will not seek formal accreditation as a 'Living Wage Organization'.

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