



**MEGHA CITY GAS DISTRIBUTION
PRIVATE LIMITED**

Policy on Abolishment of Child and Adolescent Labour

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1.0 Introduction

- 1.1 Megha City Gas Distribution Private Limited (“MCGDPL” or “the Company”) is committed in providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.
- 1.2 MCGDPL strictly prohibits the use of child and adolescent labour and human trafficking in all the Company’s operations across the Group.
- 1.3 The company strictly believes in “NO CHILD AND ADOLESCENT LABOUR”.
- 1.4 By virtue of the provisions of the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 and The Child and Adolescent Labour (Prohibition and Regulation) Rules, 1988 including any amendments from time to time thereof, the policy i.e. “MCGDPL Policy on Abolishment of Child and Adolescent Labour” (hereinafter called as “The Policy” or “This Policy”) has been made.

2.0 Scope

- 2.1 The Policy is applicable to all categories of employment in MCGDPL and other associates of MCGDPL.
- 2.2 Employees, contractors, subcontractors, vendors, suppliers, partners and others through whom MCGDPL conduct business, must avoid complicity in any practice that constitutes trafficking in persons or slavery.
- 2.3 Every employee of MCGDPL is responsible for reading, understanding and complying with this Policy.

3.0 Policy & Procedure

- 3.1 MCGDPL does not employ any person above the age of 14 years but below the age of eighteen years, at of its workplace situated in any locations in India and Overseas Countries.
- 3.2 MCGDPL needs to ensure that its contractors, suppliers and other vendors or persons with whom it has a substantial involvement, should strongly aware of this Policy and follow the said Policy always in toto.
- 3.3 MCGDPL shall ask for the undertaking on non-involvement in child and adolescent labour from its suppliers / contractors. If in doubt/as required, the Company will monitor the employment practices of the employees from such supplier / contractors through surveys, site visits and audits.
- 3.4 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 the contractors / suppliers and others; the Company must terminate the business dealings.

3.5 Compliance

- a. This Policy is consistent with MCGDPL’s “Code of Conduct & Ethics (Refer Document MPD_03_2018-19), Anti-Corruption Policy (Refer Document MPD_04_2018-19), Whistle Blower Policy (Refer Document MPD_06_2018-19), The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy (Refer Document MPD_10_2018-19), Non-Discrimination Policy (Refer Document MPD_14_2019-20), Freedom of Association Policy (Refer Document

MPD_15_2020-21) and this Policy” to protect and advance human dignity and human rights in our business operations.

- b. Necessary steps are taken to put mechanisms in place in order to ensure compliance of the employees with this Policy.

3.6 Reporting

- a. Any employee who believes or has experienced or witnessed any conduct that is in violation of this Policy, should report such concern to a Company’s supervisor or HR representative or ombudsman as defined in Whistle Blower Policy of the Company, immediately.
- b. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by the applicable law(s).
- c. All complaints may be made orally or in writing or through email. If a complaint is made orally, the employee may be asked for a written statement during the investigation.
- d. All complaints, to the extent possible, should include dates, times, location, details of the incident(s), names of the individuals involved and the names of witnesses to the incident(s).
- e. All complaints will be forwarded immediately to HR. Any supervisor of the Company who is aware of any conduct inconsistent with this Policy or who receives or learns of a report of conduct inconsistent with this Policy, must report such conduct immediately to Human Resources Department of the Company.

3.7 Responding to Complaints

- a. All reports describing conduct that is inconsistent with this Policy will be investigated promptly and thoroughly. Employees are required to cooperate during the investigations.
- b. Retaliatory treatment of any employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report, is strictly prohibited.
- c. All employees, who experience or witness any conduct they believe to be retaliatory, should immediately report such conduct directly to ombudsman through email ombudsman@meilgroup.com.

3.8 Confidentiality

- a. The Company is committed to maintain the confidentiality to the extent possible. The Company will take all reasonable measures to ensure that the situation is divulged only to those with a need to know basis.

3.9 Corrective action & Counseling

- a. If an investigation reveals that a violation of this Policy or other inappropriate conduct has occurred, then the Company will initiate corrective action / counseling for those affected by human trafficking. The Company provides assistance / counseling to those employees who suffer from personal or emotional problems.

- b. Participation in counseling is voluntary and completion of the program is the responsibility of the employee.
- c. The Company may take disciplinary action against an employee for any inappropriate conduct discovered in the investigating reports made under this Policy, including the discipline, up to and including termination of the employment, as is appropriate under the circumstances, regardless of the job positions of the parties involved.
- d. If the person who engaged in conduct in violation of this Policy is not an employee, then MCGDPL will take whatever corrective action is reasonable and appropriate under the circumstances.

4.0 Communication of Policy

- 4.1 The Policy will be available on Megha Gas website. It will also be displayed at all Sites/Units and Head Office.
- 4.2 All employees will undergo a training on Code of Conduct & at the time of joining which form a basis of this Policy.

5.0 Guidance

In the event that any additional guidance and/or further interpretation is required, the employees of MCGDPL may please contact their local Human Resources representative.

6.0 Review

The Policy may be reviewed periodically as may be desired by the Management.

7.0 Amendment

Any amendment or modification in applicable laws by the Statutory Authorities relating to the said Policy shall automatically be applicable to MCGDPL with or without amendment of the said Policy.



Venkatesh Palimpati
CEO and Director