



Century Panels Limited

Industrial Park, Gopavaram, Badvel

YSR Kadap District - 516233

Andhra Pradesh

INDIA

MODERN SLAVERY POLICY

1. PURPOSE

Century Panels Limited is committed to respecting human rights and to preventing modern slavery, forced labour, child labour and other forms of severe labour exploitation in its operations and supply chains.

This Policy establishes the Company's minimum requirements for identifying, preventing, mitigating, reporting and addressing modern slavery risks. It is intended to support responsible business conduct and alignment, where applicable, with the principles and expectations reflected in the relevant international standards.

2. WHAT IS MODERN SLAVERY?

Modern slavery is an umbrella term for serious exploitative practices in which a person's freedom and ability to make independent choices are undermined through coercion, threats, deception, abuse of power or other means.

For this Policy, modern slavery includes,

- human trafficking;
- slavery;
- forced labour;
- servitude;
- forced marriage;
- debt bondage;
- deceptive recruiting; and
- the worst forms of child labour.

Modern slavery can occur in a company's own operations, through labour contractors and recruitment arrangements, or anywhere in its supply chain.

3. SCOPE

This Policy applies to:

- all directors, officers, employees and workers of Century Panels;
- temporary, contract and agency workers engaged at or for the Company;
- contractors, labour suppliers, recruitment agencies, service providers and other business partners working for or on behalf of the Company; and
- suppliers and relevant supply-chain partners, including those providing raw materials, chemicals, paper, wood-based materials, packaging, logistics, maintenance and other goods or services.

The Company expects business partners to communicate these requirements to their own employees, agents and relevant subcontractors.

4. POLICY COMMITMENTS

Century Panels is committed to the following minimum standards:

4.1. No modern slavery

The Company will not use, support or knowingly benefit from slavery, forced labour, servitude, human trafficking, debt bondage or deceptive recruitment.

4.2. No child labour

The Company will not employ or support child labour. The minimum recruitment age for Company employees and workers engaged through contractors at Company premises shall be 18 years, subject to applicable law. Age and identity documentation will be verified where required.

4.3. Freedom to leave employment

Workers must be free to resign from employment in accordance with applicable law and contractual notice requirements. Workers must not be prevented from leaving through threats, coercion, retention of identity documents or unlawful financial penalties.

4.4. Recruitment without deception

Recruitment must be transparent. Workers must receive clear information about the job, wages, working hours, deductions, benefits and relevant conditions before or at the time of engagement.

4.5. No recruitment fees charged to workers

The Company will work to ensure that workers are not required to pay recruitment fees or unreasonable related costs to obtain or retain employment. Where such practices are identified in Company-controlled arrangements or among relevant suppliers, the Company will require corrective action and, where appropriate, repayment/remediation.

4.6. Wages, working time and benefits

The Company expects workers to receive legally required wages and benefits and to work within applicable working-time and leave requirements. Excessive working hours, unlawful deductions and withholding of earned wages are prohibited.

4.7. Identity documents

Workers should retain control of their passports, identity documents and personal records. Documents may only be held temporarily where legally required or voluntarily provided for a legitimate administrative purpose, with appropriate safeguards and access.

4.8. Freedom of association and worker voice

The Company respects applicable rights relating to freedom of association and collective representation. Workers should be able to raise concerns without intimidation, retaliation or discrimination.

4.9. Safe and respectful workplace

The Company will maintain a safe and respectful workplace and will not tolerate threats, violence, intimidation, harassment or other conduct that could contribute to exploitation.

5. MODERN SLAVERY RISK MANAGEMENT

Century Panels Limited will take a risk-based approach to modern slavery. Risk assessment will consider the nature of the Company's operations, workforce and supply chains, and may include factors such as:

- use of contract, temporary, migrant or labour-hire workers;
- recruitment practices and the involvement of labour agents;
- low-skilled or labour-intensive work;
- raw-material and chemical supply chains;
- outsourced services such as security, housekeeping, transport and maintenance;
- geographically higher-risk sourcing locations or sectors;
- subcontracting and lower-tier supply chains;
- unusually low prices, urgent orders or other commercial practices that may create pressure on suppliers; and indicators such as restricted movement, retention of identity documents, recruitment debt, deceptive job promises, excessive working hours or inability to leave employment.

6. SUPPLIER AND CONTRACTOR DUE DILIGENCE

As appropriate to the level of risk, the Company will:

- communicate this Policy and responsible-labour expectations to suppliers and contractors;
- include modern slavery and labour-rights requirements in relevant contracts, purchase orders or supplier terms;
- conduct supplier/contractor screening, questionnaires, declarations, document checks or audits where appropriate;
- assess labour-hire and recruitment agencies before engagement and periodically thereafter;
- require corrective action where material gaps are identified;
- monitor higher-risk suppliers and contractors; and
- consider suspension, escalation or termination where a supplier or contractor refuses to address serious or persistent modern slavery concerns, taking into account the need to avoid causing or worsening harm to affected workers.

The Company will seek to use leverage responsibly and will consider remediation rather than immediate disengagement where this is appropriate and does not increase risk to affected people.

7. IDENTIFICATION AND REPORTING OF CONCERNS

Employees, workers, contractors, suppliers and other stakeholders are encouraged to report suspected modern slavery or serious labour exploitation as soon as possible.

Examples of warning signs may include:

- threats, violence, coercion or intimidation;
- inability to leave employment or the workplace freely;
- excessive working hours or no meaningful rest;
- recruitment through false promises;
- recruitment debt or unexplained deductions;
- very low or withheld wages;
- control or retention of passports or identity documents;
- restricted movement or communication; and
- a worker appearing fearful of a supervisor, recruiter or intermediary.

Reports may be made through:

- immediate supervisor / department head;
- HR Department;
- EHS / Compliance function; or
- the Company's designated grievance/whistleblower mechanism.

The Company will protect confidentiality to the extent reasonably possible and will not tolerate retaliation against a person who raises concern in good faith.

8. RESPONSE, REMEDIATION AND ESCALATION

Where a credible concern is identified, the Company will assess it promptly and, where appropriate:

- protect the safety and dignity of affected workers;
- avoid actions that could increase the person's risk;
- preserve relevant information and records;
- investigate or arrange appropriate investigation;
- engage relevant management, HR, compliance, procurement and other functions;
- require corrective action from contractors or suppliers where appropriate;
- provide or facilitate appropriate remediation where the Company has caused or contributed to harm;
- cooperate with lawful authorities where required; and
- escalate significant matters to senior management and/or the Board.

The Company will not retaliate against workers or other stakeholders who raise concerns in good faith.

9. TRAINING AND AWARENESS

The Company will provide proportionate awareness and training on modern slavery and responsible labour practices to relevant employees and functions, with particular attention to HR, procurement, contract management, security, EHS, senior management and personnel responsible for supplier or contractor oversight.

Training and awareness will cover the meaning and indicators of modern slavery, responsible recruitment, worker rights, reporting channels and appropriate response to concerns.

10. GOVERNANCE AND ACCOUNTABILITY

Overall accountability for this Policy rests with the Company's senior management / governing body.

The HR / Compliance function will coordinate implementation and will work with Procurement, EHS, Operations and other relevant functions to:

- maintain risk assessments and due-diligence records;
- monitor implementation and corrective actions;
- coordinate training and awareness;
- maintain reporting and grievance mechanisms;
- track incidents and remediation; and
- prepare management reporting on progress and material issues.

Business and functional heads are responsible for implementing the requirements relevant to their areas.

11. TARGETS AND EFFECTIVENESS

The Company will establish and monitor appropriate annual targets, which may include:

- completion of modern-slavery risk assessment for relevant operations and supply-chain categories;
- coverage of relevant suppliers and labour contractors by responsible-labour requirements;
- completion of due diligence for identified higher-risk suppliers/contractors;
- completion of relevant employee and contractor awareness training;
- timely investigation and closure of reported concerns and corrective actions; and
- periodic review of the effectiveness of controls.

Performance, challenges and improvement actions will be documented and reviewed by management.

12. RECORD KEEPING

Relevant records will be maintained in accordance with Company procedures and applicable law, including, as appropriate:

- risk assessments;
- supplier and contractor due-diligence records;
- contractual requirements and declarations;
- training records;
- reports, investigations and corrective actions;
- remediation records; and
- management review and effectiveness assessments.

13. COMPLIANCE WITH LAW AND STANDARDS

The Company will comply with applicable Indian / international laws and regulations relating to employment, child labour, wages, working conditions, occupational safety, recruitment and human rights.

14. STAKEHOLDER ENGAGEMENT AND EXPERTISE

The Company will seek appropriate expertise and stakeholder input when developing or improving its modern slavery risk controls. This may include consultation with workers, relevant worker representatives, suppliers, contractors, subject-matter experts and other relevant stakeholders.

15. REVIEW AND CONTINUOUS IMPROVEMENT

This Policy will be reviewed at least annually and whenever there are material changes to the Company's operations, supply chain, applicable law, identified modern slavery risks or stakeholder expectations.

The review will consider progress, challenges, incidents, grievance outcomes, supplier findings, training effectiveness and opportunities for improvement.

16. BREACHES OF THIS POLICY

Any employee who breaches this Policy may be subject to appropriate disciplinary action in accordance with applicable law and the Company's disciplinary procedures. Depending on the nature and severity of the breach, this may include a warning, suspension, or termination of employment, including dismissal for serious misconduct or gross misconduct where applicable.

The Company may also take appropriate contractual action against contractors, suppliers, labor-hire providers, recruitment agencies, business partners or other organizations working on its behalf if they breach this Policy or fail to address identified modern slavery or labor-rights risks. Such action may include requiring corrective action, increased monitoring, suspension of work or termination of the business relationship, subject to applicable contractual terms and law.

17. APPROVAL

This Policy is approved by the Company's senior governing body / authorised senior management and is communicated to relevant employees, contractors and business partners.

18. LOOKING FORWARD

We continue to work towards strengthening our approach to eliminating the risk of modern-day slavery arising within our business or supply chain, and to ensure that our strategy is responsive to changing risk environments. The Company further continues to work upon the gaps identified as part of the Business Human Rights gap assessment and to enhance its relevant disclosures over the forthcoming years. Furthermore, to strengthen capacity building and create awareness amongst employees, the Company shall roll out a Human Rights specific training e-module and will continue to work towards implementation of the Company's Sustainable Supply Chain Framework.

Document No.: CPL/HR/MSP/001, Version: 01, Effective Date: 01-04-2026

Policy Owner: HR / Compliance Manager

Approved By: