

2.8 SUPPLIER CODE OF CONDUCT POLICY

SSEL

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Version 1.0 Dated 16.12.2024

No. of Pages 5

Developed by: ESG Department

Owner Department: PROCUREMENT DEPARTMENT

Approved by : Group CEO

Background:

Shirdi Sai Electricals Limited (SSEL) believes in conducting business with honesty and integrity, treating all people with dignity and respect, supporting our communities, and abiding by the laws, regulations and treaties of the countries in which we operate.

Purpose:

In selecting its suppliers, SSEL endeavors to choose reputable business partners who conduct their business in a manner that shows commitment to high ethical standards, safe and healthy working environments, protection of human rights and dignity, protection of the environment and compliance with the law.

The thread of Sustainability runs through the entire value chain and binds us to a common goal of sustainable development. We believe that our ESG practices make us resilient, better equipped for a tomorrow – risk ready and innovation advanced. And, moving forward as a value chain with common principles, beliefs and aspirations!

Scope: This Supplier Code of Conduct (SCoC) outlines our expectations regarding the workplace standards and business practices of our suppliers, along with their parent entities, subsidiaries, affiliates, subcontractors and others who are within their supply chain (“supplier”).

The expectations contained in this code are factors essential to our decision whether to enter into or extend existing business relationships. Each supplier is responsible for ensuring that its employees, representatives, and subcontractors understand and comply with this code.

This code is focused on principles that uphold consistent compliance obligations throughout our operations. Suppliers are also expected to comply with all laws and treaties of the territories in which they operate. Transparency at all stages is a non-negotiable mark of business responsibility, which we expect from our suppliers.

Workplace, Labor and Human Rights

Business partners/suppliers must respect, protect and endorse all internationally recognized Human Rights Standards like the UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights among others. Business partner/suppliers must also commit to fair employment practices.

Prevention of Forced Labor: Bonded labor, involuntary labor including human trafficking. Employees must have the freedom to terminate their employment with reasonable notice.

Prohibition of Child Labor: Business partners/suppliers must categorically abstain from directly or indirectly employing children below the legal minimum age for employment.

Respect and Dignity: Suppliers are expected to keep their workplaces free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse, or discrimination.

Fair remuneration & Decent Working Hours: Suppliers must follow all laws governing wages and working hours including compensation, benefits, and overtime.

Freedom of Association and Collective Bargaining: Suppliers must respect the right of their employees to join or not to join any lawful association without fear of retaliation.

Employment Eligibility & Voluntary Labor: Supplier shall only employ workers with a legal right to work. Suppliers must refrain from any conduct – and require their contractors to refrain from any conduct – that uses threats, force or any form of coercion, abduction, intimidation, retaliation or abuse of power for the purpose of exploitation, forced labor or slavery of any individual, suppliers must comply with all laws governing human trafficking and slavery.

Occupational Health & Safety

Safeguards to prevent incidents: We expect suppliers to promote and provide secure, safe and healthy work sites. Suppliers should have everything in place that is needed to reduce the risk of accidents, injuries and exposure - especially where hazardous materials are present.

Processes that ensure safety adherence: They must have well-established safety procedures, preventative maintenance and protective equipment in compliance with the law.

Regular Training & Awareness Drives: Regular training must be provided to the employees to foster a culture of safety and encourage behavior that respects safe practices

Business Conduct and Ethics:

Anti-corruption & Bribery: Suppliers must not engage in illegal payments, bribes or corruption and other unethical practices as it erodes trust, distorts competition and poses significant legal and reputational risks. A supplier must use every effort to legally understand and determine while dealing with a government official, when a payment may be legitimate and not a bribe.

Gifts and Hospitality: Any hospitality or gift provided should be for genuine purposes of goodwill and fall within the boundaries of what is generally considered normal, reasonable, and appropriate. Offer of gifts, favors or entertainment where they are intended – or appear intended to obligate the receiver are strictly discouraged.

Antitrust and Competition Laws: Suppliers must avoid agreements or actions that illegally limit trade or competition. They should avoid cartelization tactics that are detrimental to SSEL and the fair play principles. They may not offer our employees any confidential information about SSEL competitor.

General Contracting Ethics and Fiscal Integrity: When providing goods and services, suppliers must meet their contractual obligations and follow the law. Any representation must be accurate and truthful. Suppliers must not indulge in any corrupt, fraudulent, collusive or coercive practices which can attract termination. Furthermore, suppliers must keep accurate records that comply with the law.

Conflicts of Interest: Suppliers shall disclose to SSEL any potential conflict of interest, such as when one of their employees (or someone close to the employee) has a relationship with SSEL employee who can make decisions that will affect the supplier's business- or when a SSEL employee has any kind of interest in the supplier's business

Securities and Insider Trading: If a supplier learns of any material non-public information while working for SSEL they must not share that information with others or use it for market trading.

Intellectual Property and Data Privacy: Suppliers must protect all of SSEL intellectual property rights, trade secrets and proprietary information. They must also protect personally identifiable information that they keep for SSEL from unauthorized access, destruction, changes, use and disclosure.

Responsibility to the Earth & Communities:

Adherence to Environmental Laws: Suppliers must comply with all environment laws, including those relating to hazardous materials, wastewater, solid waste and air emissions.

Demonstrate commitment to environmental sustainability: We encourage our suppliers to reduce the environmental impact of their operations and safeguard the natural resources on which we all depend, especially through responsible efforts to reduce or eliminate waste of all types. Such efforts include source reduction, recycling, reusing materials and conserving water and energy.

Transparency of Impact Achieved: The impact thus achieved would be crucial as regulatory oversight on environmental impact, carbon footprint, circularity are now important to determine vendors and pricing. Hence, suppliers must be transparent and open to audit when the same is necessary for the value chain to clinch business.

Communities: We expect Suppliers to have an understanding of how their activities impact their local area and wider community. We encourage them to make positive contributions and investments including local employment opportunities, workforce volunteering, and charitable activities as well as minimizing disruption to communities.



Implementation: Suppliers must comply with this code and the law. They shall be responsible for any monitoring of their compliance and their efforts to promote compliance within their supply chains.

SSEL reserves the right to investigate any instances of a supplier's non-compliance of which it becomes aware. Non - Compliance may be grounds for SSEL to void or terminate contractual obligations with a supplier.

SUPPLIER ACKNOWLEDGEMENT: We here by acknowledge the receipt of the Supplier Code of Conduct (SCoC) of SSEL and agree to abide by the SCoC as an integral and obligatory covenant in the agreement between us and SSEL

For

[Industry Name]

Signature: _____ Date: _____

Name of Signatory: _____

Designation of Signatory: _____
