

1.3 EMPLOYEE UNDERTAKING - CODE OF CONDUCT & ETHICAL BEHAVIOUR

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EMPLOYEE UNDERTAKING - CODE OF CONDUCT & ETHICAL BEHAVIOUR

Version 1.0 Dated 16.12.2024

No. of Pages 2

Developed by: ESG Department

Owner Department: HR Department

Approved by : Group CEO

As an employee of Shirdi Sai Electricals Limited you are required to conduct yourself with the highest degree of integrity and to promote the Company's principles of ethical behavior.

The basic guidelines you are required to abide by are:

- Conduct business in an ethical, lawful and socially responsible manner.
- Perform all services in a careful and highly accurate manner, and with the utmost respect for the Company's reputation for integrity.
- Resolve any potential conflict of interest immediately.
- Provide accurate and true recordings of all Company transactions.
- Purchase supplies, equipment, etc. on behalf of the Company in an ethical manner so as to maintain objectivity and to avoid any personal preferential treatment.
- Follow the principles of equal employment opportunity, and do not discriminate against any other person due to their sex, religion, race, colour, age, national origin, marital status or physical disability.

As an employee of Shirdi Sai Electricals Limited you are required to maintain the standards of ethical business behavior and personal conduct for the officers, employees, and directors. Fundamental to our continued success is the perpetuation of integrity and the highest ethical standards.

As an employee of Shirdi Sai Electricals Limited you are required to safeguard the Company's moral, ethical, and social standards of conduct.

This Undertaking applies to all Employees and Directors of the Company.

As a pioneer in the field, offering services of high quality doubled with superior performance, to a global market, it is extremely important that every person connected with this Company bring their personal integrity to the forefront in all business and personal dealings.

Hence the Undertaking as below:

- We must all conduct our business, at all times, in an ethical, lawful and socially responsible manner.
- Ensure and assure integrity of products and services provided
- Follow diligently all laws administrative regulations, state, local and foreign, where they affect the Company. Where, laws or regulations are ambiguous, difficult to interpret or of questionable relevance, the Company's Legal consultant should be called upon for advice.
- Not indulge in improper payments
- Avoid Conflict of interest, which means avoid any circumstances that could cast doubt on the ability of the employee to act with total objectivity with regard to the Company's interests
- Follow due process in the use of confidential information
- Adhere to policy while accepting any gifts, entertainment, favors. Disclosure must be made of all gifts allowed to be accepted as per gifts policy.
- Purchasing integrity to be maintained and documented in a careful and highly accurate manner.
- Any employee, who has the authority to directly make purchases and/or approve purchases on behalf of the Company, shall do so in an ethical manner in regards to maintaining his/her own objectivity. This relates specifically to any relationship or contact, which may provide the employee with preferential treatment from a personal viewpoint. Selection of suppliers will be judged solely by the quality, price, services offered and reliability of supply
- Not make any inappropriate monetary payments to any governmental, political, business or labour organization or any individual. All transactions of the Company will be identified precisely and recorded in the financial records of the Company.

- Reporting Transactions and Payments: The books, accounts and records of the Company shall reflect full, true and accurate recordings of all Company transactions. No employee shall permit any false entry or entry in the books, accounts or records which obscures the purpose or intent of a transaction.
- No employee shall permit or approve the making of any payment on behalf of the Company with the intention or understanding that any part of such payment is to be used for a purpose other than that reported or described in the documents supporting the payment.
- Every employee making a report of any operation under his/her control or within the purview of his/her duties shall make a full, complete and accurate report whether it is intended for use within the Company or for its auditors or for external use.
- No undisclosed or unrecorded fund or asset of the Company or any subsidiary shall be maintained or established for any purpose.
- Labour, material and expense reporting must be timely and accurate; this is the responsibility of each employee. Inaccurate reporting results in improper allocation of costs.

Date

Employee Name/Designation

Signature

Read, Understood and Commit to maintain in letter & spirit the expected Code of Conduct & Ethics



