

Supplier Code of Conduct

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JAYA HIND INDUSTRIES PRIVATE LIMITED

Mumbai-Pune Road, Akurdi, Pune - 411035. INDIA

JAYA HIND INDUSTRIES PRIVATE LIMITED

SUPPLIER CODE OF CONDUCT



INTRODUCTION

Jaya Hind Industries Private Limited is engaged in the manufacturing of High Quality Aluminium Castings through world class HPDC, LPDC and GDC processes, and seamlessly delivering Superior quality products to our esteemed customers.

We continuously drive sustainability in products, combining economic success, social responsibility and environmental protection in our business operations and thereby enable our customers to meet current and future needs of society.

We seek to contribute to the economic development of the communities of the state and regions we operate in, while respecting their culture, norms and heritage. We seek to avoid any project or activity that is detrimental to the wider interests of the communities in which we operate.

We are committed to good corporate citizenship. We treat social development activities which benefit the Communities in which we operate as an integral part of our business plan through our various CSR activities.

Our Suppliers play an integral part in our sustainability journey and we can never succeed without our partners and suppliers in the value chain. We need all Suppliers' full commitment to support us on this sustainability journey through the care they invest in the parts, components and services they deliver.



PURPOSE

The purpose of the JHI Supplier Code of Conduct is to define minimum sustainability requirements for all JHI Suppliers, in the areas of:

- 1. Human Rights and Working Conditions
- 2. Health and Safety
- 3. Environmental Performance
- 4. Responsible Sourcing of Raw Materials

5. Business Ethics

We have committed to the principles of "We source responsibly" and want to partner with our suppliers to further develop their sustainability performance in our supply chain. We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards

SCOPE

This Supplier code of conduct is applicable to both Direct and Indirect procurement suppliers.

OUR GENERAL REQUIREMENTS

Supplier shall comply with all the requirements of the Supplier Code of Conduct.

Supplier shall ensure that all requirements of this Supplier Code of Conduct are cascaded to and complied with within its own operations and by its direct suppliers. We also encourage each Supplier to work proactively in their supply chain beyond their direct suppliers to implement similar standards as outlined in this Supplier Code of Conduct.

Supplier shall operate honestly and be transparent with facts and data in relation to requirements. JHI intends to maintain an open dialogue concerning achievements, trends and possibilities for improvements in the areas outlined by this Supplier Code of Conduct.

MANAGEMENT SYSTEM

Supplier shall establish and maintain adequate management systems to oversee all elements of this Supplier Code of Conduct, in proportion to the size, complexity and risk environment of the Supplier's business. It shall contain a policy commitment from the Suppliers' management as well as provide for effective duediligence and risk assessment, assign responsibility to relevant personnel, and include monitoring and reporting mechanisms related to all areas of this Supplier Code of Conduct. Such management system shall be continuously reviewed, monitored and improved, preferably under 3rd party certification.

LEGAL COMPLIANCE

Fundamental to all areas of this Supplier Code of Conduct and the baseline of all business with JHI, we require our Suppliers to be knowledgeable about and to comply with all applicable laws and regulations as well as the PO terms and conditions agreed upon with JHI. All legally required permits, approvals, licenses, registrations, inspections and related reports shall be in place, up to date and available for inspection upon request.

In case local laws and regulations are less restrictive, the principles of this Supplier Code of Conduct shall apply. In case a requirement is covered by this Supplier Code of Conduct as well as by applicable laws and/or the agreement JHI, the stricter regulation offering the greatest protection for JHI shall apply.

CONTINUOUS IMPROVEMENT

JHI believes in continuous improvement and recognizes that implementing the standards of this Supplier Code of Conduct into the Suppliers' operations and supply chains is a dynamic rather than a static process. It is important to us that our Suppliers show dedication towards embedding the requirements into their operations and across their supply chains and to seek continuous improvement over time in order to be able to show progress in all areas covered by this Supplier Code of Conduct.

IMPLEMENTATION AND COMPLIANCE

Sustainability performance as outlined by this Supplier Code of Conduct is a key indicator in JHI supplier qualification and assessment process, and accepting it is a prerequisite for doing business with us. JHI verifies compliance with the requirements of this Supplier Code of Conduct by means of a self-assessment questionnaire and reserves the right to conduct an on-site audit at any time.

Lack of co-operation, failure to address violations of the requirements of this Supplier Code of Conduct and/or non-timely implementation of necessary corrective action plans may result in a reduction in business and, ultimately, an end to the business relationship with JHI.

Any questions regarding the interpretation of this Supplier Code of Conduct or JHI's approach to sustainability in our supply chains in general can be raised to <u>jjoshi@jayahind.com</u> or <u>rbamb@jayahind.com</u>.

1. HUMAN RIGHTS & WORKING CONDITIONS

JHI strongly believes that employees are a company's most important resource and the respect for human rights forms the basis of any successful business.

CHILD LABOR

JHI does not tolerate child labour, and Supplier shall prevent all forms of child labour.



Young Employees within the age of 15 - 18 years shall not be exposed to work that may harm their physical or mental health, safety or morals.

WORKING HOURS AND LEAVE

Supplier shall always respect and comply with applicable laws and collective bargaining agreements, if applicable, on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

FORCED LABOUR

JHI does not tolerate any forms of forced labour, including but not limited to forced, bonded or compulsory labour and human trafficking. Consequently, Supplier, including their recruitment agencies, shall not engage in or tolerate restrictions of movement, excessive recruitment fees, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage, violence or any other kind of exploitation or abuse.

WAGES AND BENEFITS

Supplier shall always pay and provide its Employees' wages and benefits that, as a minimum, comply with applicable laws and collective bargaining agreements. Supplier shall provide its Employees with information about their employment terms and conditions, including benefits, in a format and language they can easily understand, such as a written employment contract and a timely wage statement. Deduction from wages is permitted only if and to the extent prescribed by applicable law, regulations or collective bargaining agreements.

NON-DISCRIMINATION AND FAIR TREATMENT

Supplier shall treat everyone with dignity and respect and provide equal employment opportunities and conditions based on the individual's ability to do the job, regardless of Employee or job applicant characteristics including, but not limited to:

- gender, gender identity or expression
- age
- nationality, race, ethnicity, skin colour or cultural background
- religion or belief
- disability, genetics, or health information including pregnancy
- sexual orientation

Supplier shall not tolerate humiliating or physical punishment or allow any Employee to be subject to verbal, psychological, physical or sexual harassment or abuse.

2. HEALTH AND SAFETY

Suppliers shall provide Employees a safe and healthy working environment that minimizes the incidence of work-related injuries and enhances the quality of products and services, the consistency of production and worker retention and morale.

Supplier shall ensure that its Employees' potential exposure to safety hazards, such as machines, equipment or substances, or other chemical, biological or physical agents, are identified, assessed and controlled through proper design and/or preventative maintenance and safe work procedures. Where hazards cannot be adequately controlled by these means, Employees shall be provided with appropriate personal protective equipment including access to first-aid supplies. Safety information shall be made available to everyone in order to educate, train, and protect the Employees from safety hazards.

Supplier shall have adequate emergency preparedness procedures in place in order to identify and assess potential emergency situations. Emergency plans, fire safety and response procedures shall be implemented, including Employee notification and evacuation procedures, Employee training and evacuation drills. Fire safety procedures shall, where available, be periodically reviewed and approved by local authorities.

Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution (as applicable).

3. ENVIRONMENTAL PERFORMANCE

JHI expects its Suppliers to reduce their negative environmental impacts by protecting the environment, conserving natural resources and continuously striving towards reducing the environmental footprint of their production, products and services throughout their entire life-cycle.

EMISSION AND WASTE MANAGEMENT

Supplier shall monitor, track and document its emissions to air, water and soil from its facilities and transports as well as the wastewater and solid waste generated by its operations in order to be able to identify aspects that Supplier can control and influence fostering opportunities for improvement and minimized emission. All output shall be monitored, tracked and documented on both the site and corporate level and be provided to JHI upon request.

Supplier shall monitor, track and document the composition of their packaging material which becomes waste at JHI in order to facilitate steps towards circular economy, e.g. utilizing noncomplex materials and/or materials for which there are locally established recycling markets available.

RESOURCES AND ENERGY CONSUMPTION

Supplier shall monitor, track and document its consumption of



natural resources such as water and raw materials, as well as sources of energy in order to be able to identify aspects that Supplier can control and can influence fostering opportunities for improvement and minimized consumption. Consumption shall be monitored, tracked and documented on both the site and corporate level and provided to JHI upon request.

4. RESPONSIBLE SOURCING OF RAW MATERIALS

Supplier shall exercise adequate due diligence following the Guidelines with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold, hereinafter referred to as "3TG", and cobalt and to make a reliable determination of the origin and source of such minerals.

5. BUSINESS ETHICS

JHI requires its Suppliers to uphold the highest standards of integrity and always operate honestly and equitably throughout their operations and business relationships.

HAZARDOUS SUBSTANCE

Supplier shall identify potentially hazardous substances in chemical products and articles used in its production and ensure that they are handled, transported, stored, recycled and disposed of safely. Safety information shall be available to educate, train, and protect Employees from hazardous materials and Employees shall have access to adequate personal protective equipment.

FAIR COMPETITION

Supplier shall respect and comply with all applicable fair trade, competition and anti-trust laws and regulations and shall not have any anti-competitive discussions or enter into any anticompetitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

BUSINESS INTEGRITY

Supplier shall at all times uphold the highest level of integrity in all business interactions and disclose details of its corporate structure when requested JHI.

CONFLICTS OF INTEREST

Supplier shall do business in an open and transparent way in order to demonstrate that they are an honest and reliable partner. Further, Supplier shall conduct business in a manner that avoids situations where private, financial or other external interests conflict with the job responsibilities of the Employee. Any situation where a JHI employee or professional under contract with JHI may have a personal interest of any kind in the Supplier 's business or any kind of economic ties with the Supplier must immediately be reported to JHI through ordinary reporting channels.

ANTI-CORRUPTION

Supplier shall not engage in, endorse nor tolerate any form of bribery or corruption, directly or indirectly. Supplier shall not offer nor accept any form of improper benefit to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Such benefits may comprise not only cash but also job opportunities, favours, travel, facilitation payments, promises to pay debts or unlawful gifts and entertainment.

CONFIDENTIALITY AND INTELLECTUAL PROPERTY RIGHTS

Supplier shall respect JHI confidential information and intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with JHI.

DATA PRIVACY

Whenever a Supplier is entrusted with personal information about individuals, Supplier shall safeguard it and take appropriate steps to protect it from misuse. All applicable data privacy laws as well as the contractual terms with JHI shall be observed when collecting, storing, using, processing or sharing personal information about individuals.

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