

SUPPLIER CODE OF CONDUCT**INTRODUCTION**

This Code of Conduct reflects values of the **INTEGRA Engineering India Ltd (IEIL)** and its **Suppliers**.

The Supplier Code of Conduct is to ensure that values of IEIL are being followed by the suppliers and all their personnel including but not limited to employees, officers, and directors. The matters covered in the Code are important for the IEIL and its Suppliers, for their business conduct.

All personnel of suppliers shall observe and implement the code of conduct in their official day to day activities.

1. ETHICAL CONDUCT

All personnel of the supplier shall deal on behalf of their company with highest level of professionalism, honesty, transparency, and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

2. REGULATORY COMPLIANCE

All personnel of the supplier shall, in his or her business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which he or she operates.

3. ACCOUNTING AND REPORTING

All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

4. MONEY LAUNDERING

The supplier shall not accept, facilitate or support money laundering.

5. TAX LAWS COMPLIANCE

The supplier shall comply with the tax laws and regulations of country in which it operates. Where tax laws do not give clear guidance, prudence and transparency shall be the guiding principle.

6. MARKETING AND SALES

The supplier shall not make false statements or provide misleading information regarding its products or their performance, including the safety and environmental attributes of the products.

SUPPLIER CODE OF CONDUCT**7. FAIR COMPETITION PRACTICES**

Supplier shall compete with other suppliers in a fair manner and with integrity. Supplier shall not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that improperly influences the marketplace or outcome of a bidding/negotiation process such as price fixing, market sharing and market manipulation. The Supplier shall not abuse a market dominant position.

8. PROHIBITION OF INSIDER TRADING

Suppliers who have access to Unpublished Price Sensitive Information (UPSI), are not allowed to buy or sell INTEGRA ENGINEERING INDIA LTD shares or any other financial instrument that relates to IEIL share, such as futures or options. In addition, he/she may not induce anyone, by giving advice or in some other manner, to undertake such trading.

9. NO POLITICAL INVOLVEMENT

Supplier shall observe neutrality with regards to political parties and candidates for public office. Supplier shall refrain from using their assets for promoting interests of political parties or candidates for public office.

10. CONFLICTS OF INTEREST

The duty of all personnel of supplier towards the IEIL demands that he or she avoids and discloses actual and potential conflicts of interest. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the IEIL.

If a supplier is considering investing in any customer, supplier, developer or competitor of the IEIL he or she must first take care to ensure that these investments do not compromise on their responsibilities towards IEIL. The INTEGRA Engineering India Ltd policy requires that information to be given while making such an investment through Non-Disclosure Agreement.

Notwithstanding that conflict of interest exist due to any historical reasons, adequate and full disclosure by the supplier should be made to the IEIL management.

11. PROTECTING OF ASSETS

The assets of the IEIL are of utmost importance and shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources as well as intangible assets such as Intellectual Property Rights, Know how & Technology, proprietary information, relationships with customers and suppliers, etc. All personnel of suppliers shall handle the assets of IEIL with utmost care and caution. They shall not steal, misappropriate or misuse the assets and shall prevent others from doing so.

SUPPLIER CODE OF CONDUCT**12. DATA PROTECTION AND CONFIDENTIALITY**

IEIL expects that the confidentiality of its business, technical and financial information should be maintained by its suppliers/supplier's employees. Supplier's employees should use extreme care in protecting confidential or proprietary information of any kind. Face-face discussions should be conducted in a secure location. The supplier shall operate under the assumption that data/information shared by IEIL's is confidential unless it is marked as public.

The supplier shall collect and process personal data only for legitimate purpose. They should protect personal data from unauthorised use.

If confidential information to be discussed or exchanged between IEIL and the supplier, or the supplier and a Third Party, the parties must first ensure that a confidentiality or Non-Disclosure agreement has been signed and is being complied with. The confidential information shall be shared on a need-to-know basis and for business purposes only.

13. PROTECTING ENVIRONMENT

The supplier must comply with all applicable environmental/pollution control laws and regulations as they relate to workplace, the product produced and the methods of manufacture. The supplier shall also look forward to conserve resources and shall commit to enhance the environmental performance by minimizing the use of fossil raw materials and promote closed material cycles. Supplier shall provide products/services of high quality and durability and continuously strive to improve them.

14. PROVIDING SAFE AND HEALTHY ENVIRONMENT

The supplier shall strive to provide a safe and healthy working environment and comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety.

The supplier should have strict procedures that prevent the use of illegal drugs or alcohol in the factory and that prevent impaired employees from working.

The supplier should continuously strive to improve safety performance by eliminating and reducing risks or by preventing the consequences of risk.

The supplier must inform any reportable accident(s) to IEIL immediately with corrective action to be taken to avoid such accident(s) in future.

15. HUMAN RIGHTS

The supplier shall support and respect the protection of internationally proclaimed human rights and make sure his company is not complicit in human rights abuses.

SUPPLIER CODE OF CONDUCT**16. CHILD OR FORCED LABOUR**

The supplier shall not hire any person less than 18 years of age. Also, supplier must not use involuntary labour of any kind, including prison labour, debt bondage or forced labour. Additional standards include the following:

- a) A supplier must comply with all applicable child labour laws, including those related to hiring, wages, hours worked, overtime and working condition. Vocational or developmental programs for young people require an exception to the age requirements.
- b) The supplier must maintain official documentation that verifies a worker's date of birth, employment and training history. IEIL reserves the right to review this information whenever required.

17. EQUAL-OPPORTUNITIES EMPLOYER

The supplier shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, nationality and disability. Employees of the Supplier shall be treated with dignity and in accordance with maintaining a work environment free of sexual harassment, whether physical, verbal or psychological.

18. WAGES AND HOURS

The supplier must follow all applicable laws regarding working hours, wages and overtime pay. Workers must be paid at least the minimum legal wage or a wage that meets local industry standards. The supplier must pay overtime and any incentive rates that meet all legal requirements or the local industry standard. Workers should receive necessary time off, paid annual leaves and holidays as required by local laws.

19. GIFTS AND DONATIONS

The supplier shall not (directly or indirectly) offer any gift, entertainment, trip, discount, service, or other benefit from his organization to any official of IEIL which would or reasonably appear to be capable of influencing such person to act in a manner which is against the interest of the IEIL.

20. CORPORATE CITIZENSHIP

The supplier's senior management personnel shall be committed to be a good corporate citizen, not only in compliance with all relevant laws and regulations, but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates, with the objective of making them self-reliant.

Such social responsibility would comprise: initiating and supporting initiatives in the field of community health and family welfare, vocational training, education and literacy, providing

SUPPLIER CODE OF CONDUCT

employment to physically challenged people and encouraging the application of modern scientific and managerial techniques and expertise, if applicable.

21. TRADE COMPLIANCE

Suppliers are expected to abide and comply with all applicable export and import laws and regulations when transferring goods, services, software, or technology within the country or across national boundaries. The Suppliers shall ensure that the items are only exported to and imported from countries that are not subject to trade restrictions, sanctions, and embargoes.

Suppliers should consult their own legal counsel if unsure about the applicability export controls and/or sanctions to a particular transaction.

22. INFORMATION REGARDING VIOLATION AND CORRECTIVE ACTION

IEIL expects its suppliers to comply with the conditions of the Supplier Code of Conduct and maintain a system to monitor compliance.

If IEIL determines that a supplier has violated this code, the supplier must provide information relating to the incident(s) and show within 30 days the action taken to correct the condition. IEIL may follow up to make sure the condition has been corrected.

23. RIGHT TO CONDUCT AUDIT

IEIL reserves the right to conduct a full audit if necessary to ensure compliance of Supplier Code of Conduct.

24. Violation of this Code of Conduct

Failure to comply with this code of conduct or any other applicable law/regulations by suppliers will result in termination of **IEIL** business relationship / association / contract with the supplier.

Speaking up:

INTEGRA Engineering India Ltd. is to foster an environment to open and honest communication. Suppliers are encouraged to raise concerns with respect to any suspected violations of this code or any other specific concern arising out of their business relationship with INTEGRA Engineering India Ltd. or its officers or employees to INTEGRA Engineering India Ltd. ombudsperson by raising their concern(s) on below mail id.

info@integraengineering.in

Place: - HALOL
Date: - 02/05/2024
Rev.: - 01



Bhavin Kariya
CEO

SUPPLIER CODE OF CONDUCT

(To be printed on Supplier's letter head)

I acknowledge receipt of supplier code of conduct from **INTEGRA Engineering India Ltd.** I understand the standards and policies contained in the **INTEGRA Engineering India Ltd.** supplier code of conduct. I affirm that I have observed and implemented the **INTEGRA Engineering India Ltd.** supplier code of conduct.

Organization Name: -

Authorised Person:-

Signature:-

Designation:-

Date:-

Seal of Supplier: