



SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is applicable to all 'Suppliers'. 'Supplier' here refers to suppliers/ service providers/traders / agents/ consultants/ contractors/ joint venture partners/ third parties including their employees, agents, and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to Peekay Steel Castings (P) Ltd.

This Code sets forth the basic requirements that we ask our Suppliers to respect and adhere to when conducting business with Peekay. This Code embodies our commitment to internationally recognized standards, including the Core Conventions of the International Labor Organization, United Nations' Universal Declaration of Human Rights as well as prevalent industry standards, and all other relevant and applicable statutory requirements concerning Environment Protection, Minimum Wages, Child Labor, Health and Safety, Sustainability, Anti-Bribery, Anti-Corruption, whichever requirements impose the highest standards of conduct.

LABOUR & HUMAN RIGHTS

Adhering to all Labor Laws and Human Rights Laws, Suppliers shall:

- Comply with all applicable local, state, and national laws regarding human rights.
- Comply with the Company's Human Rights Policy and Supplier and Contractor Sustainability Management Policy
- Ensure that all their employees are hired on their own free will and guarantee that all their operations are free from forced, bonded, compulsory, indentured, prison labor or any other form of compulsory labor and child labor.
- Ensure that all its employees are provided equal employment opportunities, an environment conducive to their growth, free from any form of discrimination and harassment.
- Ensure compliance with minimum working hours and minimum wages prescribed by applicable laws and regulations.
- Comply with all slavery and human trafficking laws- Modern Slavery Act. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices both internally and within their supply chains and other external business relationships.
- Ensure that employees are not charged any fees or costs for recruitment, directly or indirectly.
- Not confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation of any of its workers/ employees.

HEALTH, SAFETY & ENVIRONMENTAL SUSTAINABILITY

- The Supplier shall provide its employees with a safe and healthy working environment and comply with all applicable laws and regulations regarding working conditions.
- Supplier shall follow all Environmental, Health and Safety and other operational policies of the Company while executing any work or contract at the company site.

- Supplier shall follow all laws of the land including laws on Environment sustainability and protection while executing any work for the Company.
- Supplier should adopt sustainable practices in their supply chain and operations.

BUSINESS INTEGRITY

Anti-Bribery: The Supplier shall not, directly or through intermediaries, take any recourse to any unethical behavior (implicit or explicit), or offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private, including with any employee of Peekay. More specifically:

- Shall not offer or accept bribe or use other means of obtaining undue or improper advantage, offer or accept any kickbacks, and shall not take any actions to violate or cause its business partners to violate any applicable anti-bribery laws and regulations including the Prevention of Corruption Act of India.

- Shall not take any advantage of any family/ social/ political connections to obtain favorable treatment or for the advancement of business or obtaining any favors.

- Shall not enter into a financial or any other relationship with a Peekay employee that creates any actual or potential conflict of interest for Peekay.

REPORTING OF UNETHICAL PRACTICES AND GRIEVANCE ADDRESSAL MECHANISM

The Supplier shall ensure that an effective grievance procedure has been established to ensure that any worker/ employee, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

INTELLECTUAL PROPERTY

The Supplier shall take appropriate steps to safeguard and not infringe any Peekay confidential and proprietary information/intellectual property/ technology which come to its knowledge during its business relationship/ dealings with Peekay. In case of sub-contracting, sharing of confidential information should be made with the consent of Peekay.

THIRD PARTY REPRESENTATION

The Suppliers shall not be authorized to represent Peekay without the written permission of Peekay. Third parties and their employees who are authorized to represent Peekay are expected to abide by the Code of Conduct & Business Ethics Policy in their interaction with, and on behalf of Peekay including the confidentiality of information shared with them and to sign a non-disclosure agreement to support confidentiality of information.

SUPPLIER'S COMPLIANCE COMMITMENT

Suppliers must ensure that this Code is adopted and cascaded into their supply chain. Suppliers must ensure that their agents, contractors, and suppliers are also made aware of this Code, its implications and adopt the same. Suppliers must ensure to have sustainable procurement practices in place for their own suppliers.

Peekay expects the Supplier to adhere to all applicable laws and regulations and comply with this Code in letter and spirit. It is the Supplier's responsibility to read and understand the contents of this Code. As a condition of doing business with Peekay, the Supplier must comply with this Code and agree to uphold such values during its business association with Peekay.

By accepting this code of conduct, it is implied that the suppliers will ensure compliance of this 'Code' with their suppliers.

The Supplier shall maintain adequate documentation to demonstrate compliance with the principles of this Code and allow access to Peekay to check compliance upon request with reasonable notice.

The Supplier shall notify Peekay regarding any known or suspected improper behavior by the Supplier relating to its dealings with Peekay, or any known or suspected improper behavior by Peekay employees.

K E Moidu

Managing Director

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