

Bhate & Raje Construction Co. Pvt. Ltd.

Supplier Code of Conduct

Bhate & Raje Construction Co. Pvt. Ltd (BRCCPL) is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards of our Suppliers. We view our Suppliers as partners and we care about the way they do business when providing goods or services, including construction works and services.

The Supplier Code of Conduct (Code) describes the minimum expectations in the areas of: integrity, ethics and conduct; conflict of interest, gifts, benefits and hospitality; corporate governance; labour and human rights; health and safety; and environmental management. Suppliers are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

Application of this Code

Bhate & Raje Construction Co.Pvt.Ltd seeks to work with its Suppliers to meet and exceed minimum expectations as outlined in this Code and continuously strives to improve the standard of its business practices. By Supplier, BRCCPL means any entity that supplies goods or services, including construction works and services, to BRCCPL. Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier and its related entities. Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured or services are performed. Fundamental to this Code is an expectation that all Suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations. BRCCPL expects all existing and new Suppliers to commit to the Code. Suppliers should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this code.

BRCCPL expects Suppliers to communicate the Code to their related entities, Suppliers and subcontractors who support them in supplying goods and services to BRCCPL, so that they are aware of, understand and comply with the Code.

Reporting misconduct, unethical behaviour or suspected corruption

If a Supplier considers that another Supplier has deviated from or breached their obligations under this Code, it is expected to report these concerns to report@bhateraje.com

Corrective action process

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with the relevant department personnel.

A. Integrity, ethics and conduct

BRCCPL expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

Business integrity

Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering, and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

Record keeping and documentation

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring BRCCPL into disrepute.

Confidentiality

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with BRCCPL.

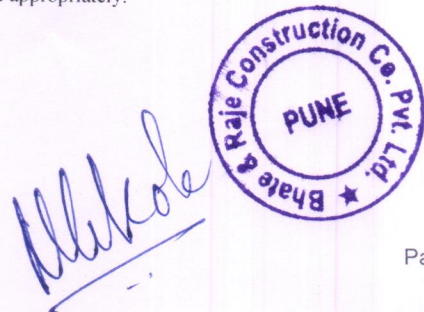
B. Conflict of interest; gifts, benefits and hospitality

BRCCPL believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

Conflict of interest

Suppliers must:

- declare to the relevant department any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with BRCCPL; and
- avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with BRCCPL. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.



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Gifts, benefits and hospitality

BRCCPL personnel must:

- (a) conduct themselves with the highest standards of integrity, impartiality and accountability; and
- (b) perform duties without favouritism, bias or for personal gain.

As such, Suppliers are expected not to:

- (a) offer BRCCPL personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesy (such as tea and coffee during a meeting); or
- (b) take any action in order to entice or obtain any unfair or improper advantage.

C. Corporate governance

Commitment to sound management administration, risk and corrective action systems, are key to a reliable supply chain for BRCCPL. Suppliers are expected to maintain sound administration processes.

Risk assessment and management

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.

Critical incident management

Suppliers should:

- (a) identify and assess potential critical incident, emergency situations and business continuity risks; and
- (b) develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.

Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

- (a) perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
- (b) cooperate openly and honestly with any audit, assessment or review.

D. Labour and human rights

BRCCPL believes that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business.

Anti-discrimination

Subject to applicable laws, Suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation and abuse. Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.

Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Consistent with relevant modern slavery legislation, Suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

Prevention of involuntary and underage labour

Suppliers are expected to:

- (a) ensure that all work is undertaken without coercion;
- (b) not use any form of forced, bonded or indentured labour; and
- (c) employ only workers who are the applicable minimum legal age.

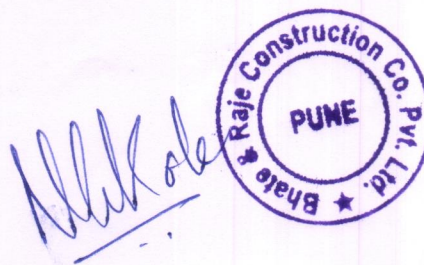
All use of temporary and outsourced labour should be within the limits of the law. Suppliers are therefore expected to:

- (a) use all reasonable endeavours to ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and applicable law; and
- (b) be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

Working hours, wages and benefits

Suppliers must:

- (a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- (b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- (c) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.



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Freedom of association and collective bargaining

Suppliers are expected to freely allow workers to associate with others, form and join associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

E. Health and safety

Worker health, safety and well-being is important to BRCCPL. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into its business.

Workplace health and safety management

Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

- (a) manage occupational health and safety hazards; and
- (b) provide workers with job-related training and consult with employees in relation to the provision of information and training.

F. Environmental management

BRCCPL is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

Environmental impacts

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

- (a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- (b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- (c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions

Waste and Emissions

- (a) Partners will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and handled prior to release of any substance into the environment
- (b) Partners will have systems in place to prevent or mitigate accidental spills and releases into the environment

Resource Conservation and Climate Protection

- (a) Partners are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way
- (b) Negative impacts on the environment and climate will be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material reutilization
- (c) Partners will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions

Security

- (a) Partners will have adequate and appropriate security practices across their supply chains.
- (b) Partners will maintain processes and standards that are designed to assure the integrity of each shipment to BRCCPL from its origin through to its destination and all points in between
- (c) Partners are expected to implement the necessary and appropriate measures in their area of responsibility to ensure that BRCCPL products, their workable components or raw materials as well as the corresponding know-how do not end up in the hands of counterfeiters or third parties and do not leave the legal supply chain

Communication of Sustainability Criteria in Supply Chain

- Partners will communicate the principles set forth in this Supplier Code of Conduct to their supply chain

Training and Competency

- Partners will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards

Continuous Improvement

- Partners are expected to continuously improve their sustainability performance by implementing appropriate measures

Commitment and Accountability

- Partners are encouraged to fulfil the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources