

BHATE & RAJE CONSTRUCTION CO PVT LTD

Business Ethics Policy

I. Introduction

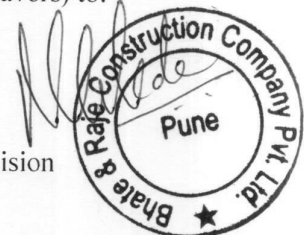
Bhate & Raje Construction Co.Pvt.Ltd.is committed to conducting business with the highest ethical standards. This policy outlines our core values and expectations for ethical conduct by all employees, directors, and officers. By following this policy, we build trust with our stakeholders, maintain a positive reputation, and achieve sustainable success.

Core Values

- **Integrity:** We conduct business with honesty, fairness, and transparency.
- **Respect:** We treat everyone with dignity and courtesy, fostering a diverse and inclusive workplace.
- **Compliance:** We adhere to all applicable laws, regulations, and industry standards.
- **Accountability:** We take responsibility for our actions and decisions.
- **Sustainability:** We strive to minimize our environmental impact and operate responsibly.

Specific Areas of Conduct

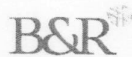
- **Conflicts of Interest:** Employees must avoid situations where personal interests could conflict with their professional duties. This includes disclosing any potential conflicts and recusing themselves from decisions when necessary.
- **Fair Competition:** We compete fairly and ethically, avoiding deceptive practices or collusion with competitors.
- **Customer Relations:** We treat customers with honesty and respect, providing accurate information and quality products and services.
- **Supplier Relations:** We select and work with suppliers based on fair business practices, quality, and ethical sourcing.
- **Anti-Corruption**
 - **Prohibited Actions:** We strictly prohibit offering, promising, authorizing, demanding, accepting, or allowing ourselves to be offered or promised anything of value (including cash, gifts, entertainment, or favors) to:
 - Public officials
 - Private business partners
 - Any individual or entity to influence a business decision



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- **Facilitation Payments:** We do not make facilitation payments (bribes) to expedite routine government actions.
- **Gifts and Entertainment:** Offering or accepting gifts or entertainment must be done in a way that does not compromise our integrity or create a perception of impropriety.
- **Conflicts of Interest:** We will have procedures to identify and manage potential conflicts of interest related to corruption.
- **Third-Party Due Diligence:** We will conduct appropriate due diligence on third-party vendors, partners, and agents to mitigate corruption risks.
- **Anti-Money Laundering**
 - **Suspicious Activity Reporting :** Employees are required to report any suspicious activity that might indicate money laundering or other financial crimes.
 - **Internal Controls:** We will maintain strong internal controls to monitor transactions and identify suspicious activity.
 - **Record-Keeping:** We will maintain accurate and complete records of all financial transactions for a specified period.
- **Confidentiality:** We maintain the confidentiality of all sensitive company information and respect the privacy of our customers, employees, and business partners.
- **Social Responsibility:** We are committed to being a positive force in the community, supporting social and environmental causes.
- **Fair competition and anti-trust**
 - **Compete Clean:** We win business on merit, never through collusion, price fixing, or misleading tactics.
 - **Respect Rivals:** We treat competitors with respect, avoiding negative campaigns or unfair market practices.
 - **Open Market:** We advocate for fair and open markets, promoting competition for the benefit of consumers.
 - **Ethical Conduct:** We conduct all business dealings with honesty and integrity.
 - **Speak Up:** We never hesitate to report any concerns about potential anti-trust violations internally or to authorities.





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- **Data Protection and Data Security**
 - Protect: We safeguard all data with strong security measures
 - Respect: We collect and use data responsibly, following privacy laws and minimizing what we store.
 - Report: We encourage reporting of any suspected privacy concerns.
 - Accountable: We are committed to data protection and hold ourselves responsible.

- **Protect & Innovate: Intellectual Property & Anti-Counterfeiting Code**
 - Respect IP: We value intellectual property and uphold copyright, trademarks, and patents.
 - Fight Fakes: We have zero tolerance for counterfeit products.
 - Report Concerns: We encourage reporting of suspected counterfeiting or IP theft.

Reporting Violations -

Employees are encouraged to report any suspected violations of this policy to their supervisor, manager of Human Resources, or the anonymous ethics hotline. We will not retaliate against anyone who reports a violation in good faith.

Enforcement

Violations of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

Review and Revision

This policy will be reviewed and revised periodically to reflect changes in our business and the legal and regulatory environment.

Conclusion

By adhering to this Business Ethics Policy, we create a culture of trust, integrity, and accountability, ensuring the long-term success of Bhate & Raje Construction Co.Pvt.Ltd.



Bhate & Raje Construction Co. Pvt. Ltd.

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