

Shanti Founmach Pvt Ltd is governed internally by management ethics & also driven by our customer's requirements. Further we expect similar commitment from all our suppliers & support us by complying as per this Supplier Code of Conduct.

**1. Compliance with Laws**

Suppliers shall comply with all applicable laws and regulations of the state & country.

**2. Human Rights**

Suppliers are expected to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

**Child Labor**

Suppliers must ensure that illegal child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age specified for employment

**3. Employment Practices****A. Harassment**

Suppliers are expected to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

**B. Non-discrimination**

Suppliers are expected to provide equal employment opportunity to employees and applicants for employment without discrimination.

**C. Wage and Benefits**

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits.

**4. Anti-Corruption****A. Anti-Corruption Laws**

Suppliers must comply with the anti-corruption laws, directives and regulations that are in place. Suppliers are required to refrain from offering or making any improper payments of money or anything of value to customers, government officials, political parties, candidates for public office, or other persons.

**B. Illegal Payments**

Suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited.

**C. Fraud and Deception**

Suppliers must not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

**D. Competition and Anti-Trust**

Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Suppliers must refrain from participating in a cartel.

**E. Gifts and Business Courtesies**

Suppliers are required to compete on the merits of their products and services. The exchange of gifts & business courtesies are strictly not permitted. Influencing management or any employee of Shanti Iron directly or indirectly through any monetary or non-monetary benefits or gifts or business courtesies is strictly prohibited.

**5. Maintain Accurate Records:**

Suppliers are required to create accurate records, and not alter any record entry to conceal or misrepresent

the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

## 6. Information Protection

### A. Confidential/Proprietary Information

Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorisation in writing from the owner of the information. NDA needs to be signed

### B. Intellectual Property

Suppliers must comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

### C. Information Security

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with applicable data privacy laws.

## 7. Environment, Health and Safety

Suppliers are expected to establish an appropriate management system for Environment, Health and Safety. Suppliers are further expected to operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which they operate.

Suppliers should protect the health, safety, and the welfare of their employees, contractors, visitors and others who may be affected by their activities.

## 8. Whistleblower:

Whistleblower policy provides a platform and mechanism for the suppliers and associates to voice genuine concerns or grievances about unprofessional conduct in Shanti Iron without fear of reprisal.

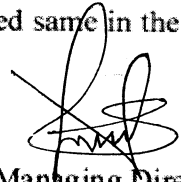
It is a dynamic source of information about what may be going wrong at various levels within the Company, which will help the Company in realigning various processes and to take corrective actions as part of good governance practice.

Shanti Iron assures to safeguard the suppliers and its Team member in case if they are highlighting any fraud or misappropriation within the company or involving Shanti Iron & take necessary actions against the offenders. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions. In case supplier notices unethical practices which is not aligned as part of this code of conduct including Shanti Iron employee if any demands any favor or gifts it is required to report to our as below as part of whistleblower policy then it is required to report

### Procedure for reporting & dealing with disclosures:

- A disclosure should be made in writing. Letters can be submitted by hand delivery, courier or by post addressed to Mr. Santosh Porwal or Mr. Shantilal Porwal or Mr. Sarvesh Porwal
- Emails can be sent on: [skp@shantifoumach.com](mailto:skp@shantifoumach.com) OR [svp@shantifoumach.com](mailto:svp@shantifoumach.com) OR [ssp@shantifoumach.com](mailto:ssp@shantifoumach.com)
- Disclosures also can be done through whatsapp on the following mobile nos – 9945026332 or 9945221972 or 8123230623

**9. Consequences for violating the Code** - In the event that the requirements of this Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s.) The concerned supplier may be blacklisted and communicated same in the industry forum and all our customers.

  
Asst Manager HR  
Managing Director