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CODE OF CONDUCT

ELCOMPONICS GROUP

(1ST April 2013- 31ST March 2014)



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CMD Mr.S.N.DWIVEDI

VISION

“TO BE GLOBALLY PREFERRED SOLUTION PROVIDERS”

MISSION

- + To exceed our customers’ expectations in quality, delivery, and cost through continuous improvement and customer interaction**
- + To achieve customers’ satisfaction through highest standard services**
- + Preserving corporate ethics based on ethical values and integrity and trust**
- + Creating and promoting mutual respect and nurturing vigorous and prosperous corporate culture**

IMS POLICY

We at Elcomponics Sales Pvt. Ltd. are committed to be the preferred supplier of connector assembly and wiring harness which are Best-In-Class and continually improve to exceed customers’ expectations and organization’s environmental performance while complying with all applicable legal, safety and other requirements

OVERVIEW

“Our Code of Business Conduct describes the ethical values we require from our employees and our Business Partners. It sets forth what we stand for and what we prohibit as a company. It also identifies policies and resources to help employees live up to these expectations.

Failure to comply with the Code can lead to disciplinary action as deemed fit, including dismissal from the Company and, where appropriate, referral to law enforcement. In summary, the Code requires all employees to:

- Do the right thing all of the time
- Deliver on our promises with the highest degree of quality, excellence and integrity
- Protect our confidential or proprietary information and that of our customers and business partners
- Respect our individual differences and the quality of ideas and innovation that result from these differences
- Build and sustain our brand, our reputation and the trust of those who work for and partner with us
- Accurately represent Company records, not conceal, falsify or destroy documents in violation of our record retention policies
- Compete aggressively but fairly and with integrity
- Avoid conflicts of interest between personal interests and our Company
- Report business conduct concerns immediately as proscribed by applicable local law, and not retaliate against anyone who speaks up in good faith
- Obtain and conduct business legally and ethically, without accepting, promising or giving bribes or kickbacks
- Work towards conserving our Natural resources and contribute towards social development and health & safety of the employees.
- Respect of human rights
- A safe and healthy working environment
- Prohibition against inappropriate hospitality or gifts
- Creation, protection and use of intellectual property rights and know-how
- Prohibition against association with anti-social groups
- Prohibition against competition or conflict of interest
- Appropriate and timely information disclosure
- Appropriate protection and handling of information (corporate information, private information, etc.)
- Preservation of company assets
- Respect for the global environment
- Cooperation with the international community and co-existence with local communities

AUTHORIZED SIGNATORY
ANJULA DWIVEDI
ADDL.GENERAL MANAGER (HRD)

DATED 01.04.2013

EQUAL OPPORTUNITIES EMPLOYER

An ESPL company 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, gender, sexual orientation, age, nationality, ethnic origin or disability.

Human resource policies shall promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Employees of a ESPL company shall be treated with dignity and in accordance with the ESPL policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological. Employee policies and practices shall be administered in a manner consistent with applicable laws and other provisions of this Code, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity is provided to those eligible and decisions are based on merit

ANTI-DISCRIMINATION POLICY

The Company considers only individual's capacity, capability, potentiality, caliber, skill, and talents for attainment of company goals as well as individual goals".

- ✓ It is the policy of the company not to get engaged in or support discrimination practices while hiring/employment based on race, religion, gender, color, and caste.
- ✓ The people working in the company are composition of different religion and cast no preferential system is adopted in the employment.
- ✓ The management adopted principal of equal opportunities and equal treatment.
- ✓ Promotion of the employee is also uniform for all qualification, experience, performance, punctuality, and general behavior with the fellow worker superiors are some of the criteria consider for employee promotion irrespective of caste, religion, sex etc.
- ✓ The management ensure that no discrimination in usage of canteen, toilet, parking and entire factory premises.
- ✓ The management ensure that no discrimination in participation of any training and occasions which conducted by company.

ANTI-HARASSMENT AND ABUSE POLICY

“Harassment and Abuse policy ensure that the management & all employees must treat every employee with respect and dignity”.

- The management boosts an environment that is free from harassment and Abuse of any kind including physical, verbal, psychological, and sexual and others.
- The management shall not use physical discipline, including slaps, pushes, or other form of physical contact and prohibits screaming, threatening, or any vulgar language.
- The management will not unreasonably restrain workers freedom of movement in canteen, during breaks using toilets, accessing water or medical services.
- The management will provide training to supervisor and managers on the factory’s harassment policy. Make aware them disciplinary measures.
- The management will provide a procedure for employee to report harassment and abuse behavior.
- The management has established an upstream communication system or suggestion box where workers can raise issues.
- The management should ensure that no employee will be punished for reporting.
- No employee is exempted from this policy as it applies to workers, staff, and all other who authorized to enter the factory premises.
- At the time of recruitment the management must communicate this policy to new entrants.

OBJECTIVES –

1. No Fear to Protest
2. To provide the work environment without any type of harassment/Abuse.
3. To provide guidelines on action to be taken in case any employee (Contract & Onroll) faces harassment.
4. To probe harassment cases.
5. Break Through: To build human rights culture-Harassment can be men against women, women against men, women against women, men against men.

CONSTITUTION OF COMMITTEE-

The Anti Harassment committee deals in harassment and is headed by a woman of managerial capacity only. An NGO member also is a part of the committee and visits organization on case to case basis, our Mrs.MD /MD will be visiting the committee in place of NGO. The Committee is constituted and run by the following.

Head of the Committee:- Mrs. Anjula Dwivedi

Chief Co-ordinator: Ms.Soni Sharma

MEMBERS-: Manisha mishra Aradhana, Vandana, Neetu Sharma, Esha Kohal, Amit bansal, Vinay Kumar, Vivek Mehrotra

The membership can be change as per requisition.

REPORTING CONCERNS

Every employee of an ESPL company shall promptly report to the management, when she / he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanor or act not in the company's interest. Such reporting shall be made available to suppliers and partners, too.

Any ESPL employee can choose to make a protected disclosure under the whistleblower policy of the company, providing for reporting to the chairperson of the audit committee or the board of directors or specified authority. Such a protected disclosure shall be forwarded, when there is reasonable evidence to conclude that a violation is possible or has taken place, with a covering letter, which shall not bear the identity of the whistleblower. The company shall ensure protection to the whistleblower and any attempts to intimidate him / her would be treated as a violation of the Code.

STANDING OPERATING PROCEDURE –WHISTLE BLOWING, HARRASMENT, & CORRUPTION & BRIBERY etc (Other breeches of Code)

It is the endeavor of to ensure a safe, secure and congenial work environment where employees will deliver their best without any inhibition, threat or fear.

- An employee if is being harassed directly or indirectly or is suspicious of any wrong doing may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature immediately or within 10 days of occurrence of incident.
- Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation. The employee can write to the Committee on a confidential mail ID created for the purpose shc@elcomponics.com
- The Committee will hold a meeting with the Complainant within 24 hours of the receipt of the complaint.
- The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he /she shall supply original copies of such documents. Both shall affix his /her signature on the respective documents to certify these to be original copies.
- The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- The Committee shall complete the “Enquiry” within three months and communicate its findings and its recommendations for action to the Director/COO. The DIRECTOR/COO will direct appropriate action in accordance with the recommendation proposed by the Committee. This policy is subject to change as per management decisions from time to time.

GRIEVANCE REDRESSAL POLICY

“It is well established fact that the biggest asset of the company is employees, if any employee suffering from any grievance it is not only effect to him but also to the company”.

- ❖ The management must treat every employee with respect and dignity. The management must strive to foster an environment where a worker is free to express his/her grievance.
- ❖ The management must communicate this policy during the new employee induction/ orientation and at ongoing management meetings.
- ❖ Management must ensure that the grievance case should be kept confidential.
- ❖ No employee is exempted from this policy. As it applies to workers, staff and all.
- ❖ If any grievance is received the management immediately investigates the allegation.
- ❖ The management will document the investigation and any disciplinary action is taken against the grievance with the acknowledgment.
- ❖ **Grievance handling following manner.**
 - ❖ Defining the nature of the grievance
 - ❖ Getting all relevant facts
 - ❖ Analyzing the facts
 - ❖ Taking an appropriate decision
 - ❖ Communicating the decision to the aggrieved worker.

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REGULATORY COMPLIANCE

Employees of an ESPL company, in their business conduct, shall comply with all applicable laws and regulations, in letter and spirit, in all the territories in which they operate. If the ethical and professional standards of applicable laws and regulations are below that of the Code, then the standards of the Code shall prevail.

Directors of a ESPL company shall comply with applicable laws and regulations of all the relevant regulatory and other authorities. As good governance practice they shall safeguard the confidentiality of all information received by them by virtue of their position.

ANTI-CHILD LABOUR POLICY

“It is the policy of the company to ensure that no child labour is employed for the production of the company goods or service”. The management strictly followed the factory Act 1948 and U P factories Rule 1950.

- The management recruiting the employees through advertisement or direct contact with our existing employee reference.
- The HR- Dept get age proof document from each employee and maintain individual personal file.
- The applicant application/resume thoroughly scrutinizes to ensure that it is complete in all respect.
- Identity card issued to all employee upon joining the duty.

WORKING COMPENSATION POLICY

“The company to ensure that, all employees receive regularly the wage and benefits as per the notification published from time to time by the Government of U P Dept of Labour”.

It is the responsibility and accountability of the management to ensure compliance with applicable laws.

Management to ensure that the wage and benefits are paid timely.

HR – Dept to calculate monthly wage and maintain appropriate wage record.

The wages are paid to employee on 7th day of the month ending.

The wage paid are recorded on muster roll and wage register as per form- 12, U P factories rules 1950 and minimum wage Act and payment of wage Act rule.

The wages are paid in cash/through bank for their transactions.

The statement of total earnings and applicable deductions are clearly printed on the wage slips.

The employees are also entitled to get other benefits such as annual leave , maternity leaves as per Acts

HEALTH, SAFETY AND ENVIRONMENT POLICY

“The policy of the company is to maintain a safe and healthy working environment in the factory premises”.

- It is primary responsibility and accountability of the management to ensure that a safe and healthy working environment is to provide.
 - It is the responsibility and accountability the management to ensure that all the employees carry out daily work in accordance with safe working practice.
 - All employees are responsible to work safely and observe safety rules safe working practice and accountability for their action which may cause injuries to other people and property damage.
 - Unauthorized entry of any person in the factory premises is not allowed.
 - Taking photography and video in the factory premises is not allowed unless approved by the manager.
 - Smoking and use of fire is not allowed at the workplace.
- No intoxicating drinks, drugs, alcoholics drinks are allowed to be consumed in the premises and no person will be allowed to enter the factory premises by consuming them.
- Adequate number of fire extinguisher is provided to take care of emergency fire a register is maintained which details about their identification number and locations.
- Adequate numbers of first aid boxes equipped with required medicine is provided in the factory for first aid treatment.
 - Potable water purified and tested to confirm its fitness for consumption.
 - Sufficient toilet and urinals facilities are provided for all the employees.
 - All machines are properly fitted with guard, fence to avoid accident or injures to the operators.
 - Safety instructions are documented and displayed in the respective departments for all machineries.

BUSINESS CODE OF CONDUCT POLICY

OBJECTIVE:

These guidelines are intended for the following purposes:

- ◆ *To provide guidelines to aid employees in making decisions that has ethical and legal implications.*
- ◆ *To specify standards to ensure that employees are treated fairly without discrimination and harassment.*
- ◆ *To indicate the range of disciplinary actions that may be taken as a result of the violation of these guidelines.*

CONFLICT OF INTEREST

A conflict of interest can arise whenever an employee acts in a manner, or participates in any transaction, relationship or situation which conflicts with or may appear to conflict with the best interests of the company. Situations that give the appearance of a conflict of interest can be just as detrimental as an actual conflict. Actual or potential conflicts of interest should always be disclosed to the immediate supervisor.

- ◆ A conflict of interest arises when an employee is/becomes involved in an outside business interest which :
 - Is a competitor or supplier of the company
 - May adversely affect the employees judgment in acting for the company
 - Interferes with the employees obligation of devoting full-time attention to his responsibilities
 - May adversely affect the company in any way, including its relationship with an external agency.
- ◆ An employee wishing to undertake an activity such as teaching or writing can do so provided he keeps his supervisor informed prior to accepting such commitments to ensure that there is no interference with his business schedule, and it is determined that there is no conflict of interest or intellectual property protection issues.

RESOURCE MANAGEMENT (External & Internal)

The business environment in which we operate is changing continuously and rapidly. It is therefore essential for employees to be proactive to these changes and be able to manage the change.

- ◆ It is of vital importance to be innovative and increase our productivity in **all** spheres of activity. Increased productivity will come from higher efficiency, more innovative ways of doing business and automation.
- ◆ In our work, we are entrusted with several of the organization's resources (natural & man made) and assets including people, material and money. It is the responsibility of all of us to work towards the highest resource productivity.
- ◆ Plant equipment and other resources must be used to achieve high capacity utilization and low operational costs to ensure judicious use of resources. Since, we all influence company expenditure; cost consciousness is necessary in every area of activity. There is a need to question the necessity of each expenditure to enable all of us to work towards better and innovative methods to achieve highest resource productivity

EMPLOYEE STANDARDS OF CONDUCT

As an employee of ELCOMPONICS GROUP, you represent the company to those with whom you come into contact. Therefore, your conduct should reflect favorably on both you and the company. Every employee is expected to follow good business practice that complies with the law and reflects the highest standards of corporate and individual behavior.

Employee standards of conduct exist in order to provide a safe, fair and businesslike atmosphere in which to work. It is your responsibility to be aware of, understand and adhere to these requirements.

Conduct which jeopardizes your own safety or your ability to perform your job, or that of another employee, will not be tolerated and will result in corrective action ranging from warning to dismissal, depending upon the seriousness of the action.

Examples of unacceptable conduct include, *but are not limited to*:

- ◆ Habitual lateness or absences even for legitimate reasons. Regular attendance and consistent punctuality is both expected and required, and will be an important factor in your overall performance appraisal. Habitual absence or lateness, even if for legitimate reasons will be grounds for corrective action, upto and including dismissal.
- ◆ Failure to return on a stipulated date following an approved leave of absence.
- ◆ Falsification of expense statements.
- ◆ Incorrect or incomplete information on employment application or other personal records
- ◆ Conviction of a crime that may have adverse affects on your job responsibilities
- ◆ Conduct or behavior that is disruptive to the normal operation of the business or that is dangerous or offensive to other employees such as (but not limited to) stealing, or damaging company property or material, disclosing trade secrets or other confidential information (***An employee of a ESPL shall not derive any benefit or counsel, or assist others to derive any benefit, from access to and possession of information about the company or group or its clients or suppliers that is not in the public domain and, thus, constitutes unpublished, price-sensitive insider information he shall also respect and observe the confidentiality of information pertaining to other companies, their patents, intellectual property rights, trademarks and inventions; and strictly observe a practice of “non-disclosure”.***) insubordination, use of intemperate language, any form of physical, psychological or verbal harassment, carrying or concealing weapon, assault, or any other act which can be reasonably constructed to be detrimental to the business interests of the company.
- ◆ Consumption and entering company premises under the influence of alcoholic drinks, gutkha, tobacco and smoking and taking regular intervals for smoking is prohibited. ANY employee caught doing so would make himself legible for strict disciplinary action.
- ◆ Carrying lethal weapons, fighting or attempting bodily injury to other workman is prohibited and immediate suspension is given.

GIFTS/CORRUPTION & BRIBERY

- ◆ They may even include buying equipment from suppliers for personal use at high discounts. Employees are not to accept gifts or loans from companies doing business with ELCOMPONICS GROUP. Unless they are of nominal value of upto 1500 Rs and do not affect the relationship between the company & the third party in any way.
- The prevention, detection and reporting of bribery and other forms of corruption (Applicable to suppliers, customers, legal parties and any other concerned parties) are the responsibility of all those working for ESPL or under ESPL'S control. Employees are required to avoid any activity that might lead to or suggest a breach of this Policy. All the work would be in a legal fashion in the authorized manner
Employees must notify his / her Manager or the CSR Committee via Anjula@elcomponics.com or in Written to the AGM -HRD as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred or may occur in the future

ANTI COMPETITIVE PRACTICES

ESPL will not indulge in the below given or any other such activities which add to the anti competitiveness in the market

Dumping, where a company sells a product in a competitive market at a loss. Though the company loses money for each sale, the company hopes to force other competitors out of the market, after which the company would be free to raise prices for a greater profit.

Exclusive dealing, where a retailer or wholesaler is obliged by contract to only purchase from the contracted supplier.

Price fixing, where companies collude to set prices, effectively dismantling the free market.

Refusal to deal, e.g., two companies agree not to use a certain vendor

Dividing territories, an agreement by two companies to stay out of each other's way and reduce competition in the agreed-upon territories.

Limit Pricing, where the price is set by a monopolist at a level intended to discourage entry into a market. etc

CONFIDENTIAL INFORMATION

An employee of an ESPL company and his / her immediate family shall not derive any benefit or counsel, or assist others to derive any benefit, from access to and possession of information about the company or group or its clients or suppliers that is not in the public domain and, thus, constitutes unpublished, price-sensitive insider information.

PROTECTING COMPANY ASSETS

The assets of an ESPL company shall not be misused; they shall be employed primarily and judiciously 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 information technology and systems, proprietary information, intellectual property, and relationships with customers and suppliers.

PROCUREMENT POLICY

1. Departments are to purchase goods and services that have reduced impacts on the environment (***RoHS & Reach Compliant***) compared with competing products and services that achieve the same function and value for money outcomes.
2. Departments are required to consider environmental impacts and opportunities during the procurement process with attention given to the early stages of the procurement process when defining business needs, market analysis, tender and quotation strategy, leading to market engagement.
3. Departments are responsible for addressing environmental procurement considerations and reporting on implementation.
4. Departments are responsible for developing their approach to environmental procurement. Departments may be required to report on their environmental related actions through reporting systems established by ESPL .
5. The outcome of the value for money consideration may support the inclusion of environmental requirements in the request for tender or quotation.
6. Mandatory criteria must be based on identifiable technical standards or quantifiable data. Alternatively minimum environmental requirements can be defined in relation to the impact of the good or service on the environment.
7. Government can mandate minimum environmental requirements to be included in procurement of specific goods or services
8. Department relationships with suppliers should include the principle of continuous environmental improvement.
9. Our Responsible Procurement Policy has the following principles :
 - **Health & Safety** – we expect our suppliers to adopt management practices in respect of Health & Safety which provide a high level of safeguarding for their workers.
 - **Fair Business Practices**
 - **Environmental Protection** – we expect suppliers to maintain effective policies, processes and procedures to manage their environmental impact.
 - **Human Rights** – we expect our suppliers to develop and implement policies and procedures to ensure all human rights in their business and to encourage their suppliers to do likewise.

ELCOMPONICS IT POLICY

To All the employees,

Below are the guidelines to use the IT Infrastructure or part of it.

You agree to use the infrastructure or any part of it for the official purpose only.

Computer Systems (Desktop / Laptop)

The Operating system and the software on it will be installed as per the project requirement. Instant messaging software is installed for internal chat among the team members.

Desktop/laptop is meant to be used only for the official purpose, any personal data/songs/movies/photos etc. are not allowed to be saved.

Email Usage

You will be given a @elcomponics.com account; this account can be used to send mails to

@elcomponics.com accounts and other official contacts outside elcomponics.com domain.

The email account created in this domain should not be used in the public websites forms / or public groups. You should not subscribe to the mailing list on the internet using this email address. This is to minimize spamming on our domain.

Other Accessories

Other Accessories or IT equipment which is not explicitly written here can be issued based on their project requirements. And that is your responsibility to take good care of it. Any losses / damage to it need to be reported in written to IT Support immediately.

You are not authorized to unplug any cable connected to the computer or move any IT assets without taking prior permission from IT Support Team.

Internet Usage

There are certain categories of sites/contents which are blocked and while trying to access sites under this category you may get a message like “This site is blocked by the Elcomponics Internet Access Policy.”

Users are advised not to visit websites other than allowed and required for the official purposes. As this consumes our internet bandwidth and other team members are certainly affected due to this reason.

While accessing any new URL for the first time if you get error message “The page cannot be displayed” please contact IT Team to check the URL.

Don't save or download any software without prior permission from I.T. Department

Own Storage Media or Laptops.

No one is authorized to bring their own storage media or laptops, Be it Pen drives or Hard drives without prior written approval from I.T. Department.

Backup Policy

Kindly maintain an office backup data for future risk and keep it safe in user data in current date folder.

Also remove the old date's folder if any.

Power Usage inside office

Everyone is expected to switch off their computers including monitors when not in use, this is to make proper utilization of the power resources available to us. Monitors can be switched off when you take a break or leave for home in the day end.

SUPPLIER CODE OF CONDUCT

Elcomponics Sales Pvt Ltd Supplier Code of Conduct describes our corporate responsibility requirements for our third party suppliers (“Suppliers”). It is based upon ISO 26000

Elcomponics Sales Pvt Ltd Supplier Code of Conduct requires all our Suppliers to ensure that working conditions in their operations and supply chains are safe that workers (e.g., employees, contract workers) are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

Suppliers, in all of their activities, must operate in full conformance with the laws, rules and regulations of the countries in which they operate. The Code also encourages Suppliers to meet internationally recognized standards and best practices, in order to advance social and environmental responsibility, and business ethics.

The Supplier Code of Conduct is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics and section E is for Management System

A. LABOR Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor requirements for Suppliers are:

- 1) Freely Chosen Employment
- 2) Child Labor Ban
- 3) Working Hours.
- 4) Wages and Benefits
- 5) Humane Treatment
- 6) Non-Discrimination
- 7) Freedom of Association

B. HEALTH and SAFETY Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety requirements for Suppliers are:

- 1) Occupational Safety
- 2) Emergency Preparedness
- 3) Occupational Injury and Illness
- 4) Industrial Hygiene.
- 5) Physically Demanding Work.
- 6) Machine Safeguarding
- 7) Sanitation, & Food

C. ENVIRONMENTAL Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

The environmental requirements for Suppliers are:

- 1) Environmental Permits and Reporting
 - 2) Pollution Prevention and Resource Reduction
 - 3) Hazardous Substances
 - 4) Wastewater and Solid Waste
 - 5) Air Emissions Regulations
 - 6) Product Content Restrictions
- Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

D. ETHICS To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

- 1) Business Integrity.
- 2) No Improper Advantage Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.
- 3) Disclosure of Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records, or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 4) Fair Business, Advertising and Competition Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

E. MANAGEMENT SYSTEM Supplier shall adopt or establish a management system whose scope is related to the content of this Supplier Code of Conduct. The management system shall be designed to ensure: (a) conformance with applicable laws, and regulations related to the Supplier's operations and products; (b) conformance with this Supplier Code of Conduct; Supplier's management system will contain the following elements:

- 1) Company Commitment
- 2) Management Accountability and Responsibility
- 3) Legal and Customer Requirements
- 4) Risk Assessment and Risk Management
- 5) Improvement Objectives
- 6) Training
- 7) Communication
- 8) Worker Feedback and Participation
- 9) Audits and Assessments.
- 10) Corrective Action Process
- 11) Documentation and Records.
- 12) Supplier Responsibility

AUDITS

Elcomponics Sales Pvt Ltd itself or may engage third parties to, conduct onsite audits or issue-based assessments of Supplier's conformance with the Supplier Code of Conduct, as well as relevant laws, codes and ordinances (the "CSR Audit"). Audits will be conducted at Suppliers expense. In the event Supplier refuses to permit or cooperate with a CSR Audit, whether with or without notice, Supplier shall pay all expenses associated with the refused or non-cooperative audit together with the cost of a subsequent audit. If Elcomponics Sales Pvt identifies any findings or areas of non-conformance from its CSR Audits, then in accordance with the terms and time frames given, Supplier will submit a corrective action plan, provide sufficient information for Elcomponics Sales Pvt to conduct a root cause analysis of all issues of non-conformance, and take all steps identified by Elcomponics Sales Pvt to remedy all issues of non-conformance.

THANK YOU!!