

<b>POLICY REFERENCE</b>	<b>SUPPLIER CODE OF CONDUCT</b>
<b>POLICY OWNER</b>	<b>RAW MATERIAL PROCUREMENT (RM)</b>

### **CODE OF BUSINESS CONDUCT**

Srichakra (Company) is committed to conducting business with responsibility and integrity. The core values and purpose which form part of our integral system reflects in our brand and reputation. We strive to ensure that our actions and policies are not only in compliance with the laws but also are in line with high business ethics, standards, and integrity.

The Company expects its stakeholders to comply with the law of the land and act ethically in conducting the business. This code enables them to follow the standards and general rules for our professional conduct, which if practised helps the company to be consistent with the values and core purpose.

This code must be read in letter as well as in spirit.

#### **Applicability:**

This code is applicable to vendors, suppliers, service providers and third parties (herein referred to as stakeholders) dealing with Srichakra and on its behalf.

#### **Anti-Corruption & Bribery:**

Bribery is an offer, promise, giving, demanding or acceptance of an advantage stimulating an action which is illegal, unethical or for breach of trust.

The Stakeholders shall adhere to:

- Foreign Contribution Regulation Act (FCRA), 2010 which principally aims to prohibit the foreign dealings and regulating the foreign contributions in the country by certain specified persons as enunciated in the Act, which includes Judges, Government Servants, Employees of Government, Members of Legislature of State as well as Parliament and political organizations.
- The Foreign Corrupt Practices Act (the “FCPA”) which prohibits from offering or giving money or any item of value to win or retain business or to influence any act or decision of any public official, political party, any international organization.
- Anti-Corruption Legislations that the Company is subject to, including Indian Penal Code, 1860, the Prevention of Corruption Act, 1988, Companies Act, 2013, Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015, Prevention of Money Laundering act, 2002 etc which criminalizes bribes accepted or given.

The stakeholders must not transfer anything of value, directly or indirectly, to any government official, employee of Srichakra or a government-controlled company, or political party, to obtain any improper benefit or advantage. The stakeholders must keep a written accounting of all payments (including any gifts, meals, entertainment, or anything else of value made on behalf of Srichakra, or out of funds provided by Srichakra. The stakeholders must furnish a copy of this accounting to Srichakra upon request.

Employees and service providers must not use subcontracts, purchase orders, consulting agreements etc as means of channelling payment to public officials, to employees of business partners or to their relatives/business associates or others.

**Gifts, Entertainment & Hospitality:**

- Generally, it is not acceptable to exchange gifts with business partners/customers and authorities since this may imply influence or the potential to influence in favor of the employee/Company and compromise objectivity in decision making. Individuals should make every effort to refuse or return gifts.
- The Company recognizes that it may be customary to receive and give nominal gifts (such as stationery, consumables, flowers, etc.) to our business partners and colleagues on special occasions like festivals, marriages, celebrations etc as long as such a gift is within norms of the company's gift policy and is not meant to influence any decision making of any official of the company.
- Likewise, bona fide hospitality and promotional, or other business expenditure which seeks to improve the image of a commercial organization, better to present products and services, or establish cordial relations, is recognized as an established and important part of doing business if it is within reasonable monetary limits.

**Conflicts of interest:**

The Stakeholders of the Company should act in the best interest of the Company. Accordingly, should not have a relationship, financial or otherwise, with any Employee of the company which might conflict, or appear to conflict, with the employee's obligation to act in the best interest of the Company. For example, the Stakeholders should not employ or otherwise make payments to any employee of the Company during any transaction between the supplier and the Company. Friendships outside of the course of business are inevitable and acceptable, but the Stakeholders should take care that any personal relationship is not used to influence the company employee's business judgment.

If a supplier or his Employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or same or opposite sex domestic partner) to an employee of Srichakra, or if a supplier has any other relationship with an employee of Srichakra that might represent a conflict of interest, the supplier should disclose this fact to the Company.

**Protecting Confidentiality:**

The Stakeholders should protect the confidential information of the Company. The Stakeholders who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by Srichakra. If a supplier believes it has been given access to the confidential information of the company by error, the supplier should immediately notify its contact at the Company and refrain from further distribution of the information. Similarly, a supplier should not share with anyone at the company any information related to any other company if the supplier is under a contractual or legal obligation not to share the information.

**Reporting Potential Misconduct:**

The Stakeholders who believe that an employee of the Company, or anyone acting on behalf of the Company, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. The supplier can contact the employee's manager or the Compliance officer at [info@srichakra.in](mailto:info@srichakra.in). The Stakeholders relationship with the Company will not be affected by reporting potential misconduct by any employee of the company.