

HARIOM PIPE INDUSTRIES LIMITED

Supplier Code of Conduct

SUPPLIER CODE OF CONDUCT

Purpose and Scope:

The Supplier Code of Conduct (SCC) is a document which covers the understanding of the Hariom Pipe Industries Limited (“HPIL”) with its Suppliers of Goods. The purpose of the SCC is to outline HPIL GROUP’s expectations from the registered Suppliers with whom it does business. This Code of Conduct defines the basic requirements placed on the suppliers and third-party intermediaries of HPIL concerning their responsibilities towards their stakeholders and the environment. The SCC document is based upon HPIL values of **Entrepreneurship with a Purpose, Customer Centricity, Innovation and Execution, Collaboration, Care for Environment and Society.**

HPIL expects that the Suppliers should strive to meet the industry best practices and principles on the Code of Conduct. The SCC is dynamic, and Suppliers are encouraged to continually improve their workplace conditions.

HPIL expects that this SCC is adhered to and communicated to its Suppliers and their employees in their local language and in a manner that is understood by all. All Suppliers are expected to adhere to the standards mentioned herein and fully comply with applicable laws, rules and regulations and adhere to environmental, social and governance standards.

Supplier Code of Conduct:

1. People

HPIL is committed to creating and supporting a culture and work environment in which people have equal opportunities to do their best work.

- 1.1. Harassment or Asexual Treatment:** HPIL expects its Suppliers to create and maintain an environment that treats all employees with dignity and respect and refuse to tolerate any harassment or inhumane treatment including but not limited to mental cruelty, violence, sexual exploitation or corporal punishment of any kind.
- 1.2. Discrimination:** HPIL expects its Suppliers to ensure equal opportunity to all and treatment in respect of employment and occupation without discrimination on grounds of race, caste, colour, ethnicity, ancestry, marital status, nationality, sexual orientation, age, disability, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country.
- 1.3. Compensation, Working Hours and Conditions of Work:** HPIL expects its Suppliers to comply with all relevant local and national laws and regulations with regards to wages, compensation, working hours and conditions of work and these should meet local industry standard for business of the same character.
- 1.4. Health and Safety:** HPIL expects its Suppliers to comply with all relevant local and national laws and regulations regarding occupational health and safety and the provision of health-related benefits to employees. HPIL expects its Suppliers to ensure, so far as is reasonably practicable, that:

- (a) adequate protective clothing, protective equipment and safety devices are provided to prevent any kind of accidents and avoid the risk of accidents or of adverse effects to health.
- (b) the workplaces, machinery, equipment and processes under their control are safe to work and handle.
- (c) appropriate measures of protection are made available to handle chemical, physical and biological substances; and
- (d) well illuminated and ventilated work environment, safe drinking water and access to clean toilets and restrooms are provided

1.5. Forced or Compulsory Labour: HPIL expects its Suppliers to prohibit forced or compulsory labour in all its forms including but not limited to forced prison labour, bonded labour, slave labour or any form of human trafficking.

1.6. Child Labour: HPIL expects its Suppliers not to employ: (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a Contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstance in which it is carried out, is likely to harm the health, safety or morals of such persons.

2. Environment

HPIL is committed to environmental conservation and expect its Suppliers to do so and follow best practices to minimize adverse environmental impacts while doing business. HPIL expects its Suppliers to ensure following,

- (a) Supplier are expected to act in accordance with the applicable statutory laws regarding the environment.
- (b) Suppliers should focus on minimizing environmental pollution and make continuous improvements in environmental protection. All environmental permits, approvals and registrations to be obtained and maintained and produced as and when required.
- (c) Suppliers should develop and promote or adopt environment-friendly technologies to protect the environment.
- (d) Supplier should develop and implement effective environmental management systems that helps to identify risks, measure and monitor performance, and drive continual improvements to mitigate or minimise environmental impacts from its operations

3. Community

HPIL aims to make a net positive contribution to our communities and societies and betterment of the mankind.

3.1. Community Engagement & Development: HPIL expects its Suppliers to commit to contribute to the local communities which the Supplier impacts and to support their sustainable development.

4. Corporate Governance, Business Conduct and Ethics

HPIL regards good corporate governance as being of critical importance to all it's stakeholders and strives to ensure that HPIL meets high standards of governance across its operations.

- 4.1. Corruption, Bribery and Money Laundering:** HPIL expects its Suppliers to adhere to the highest standards of moral and ethical conduct, to respect applicable laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, bribery, money laundering, prohibited trade and business practices. Any violation may attract appropriate disciplinary action against the concerned Supplier.
- 4.2. Gifts, Donations and Hospitality:** HPIL expects its Suppliers not to involve into the activities of offering gift, donations or hospitality including but not limited to invitation to sports or cultural events, holiday offers or other recreational trips, transportation, or invitations to lunches or dinners, free goods or services; either directly or through its employees, agents or representatives to facilitate the business with HPIL.
- 4.3. Conflict of Interest:** HPIL expects its Suppliers to avoid and disclose to HPIL any situation that may appear as a conflict of interest and disclose to HPIL if any of its official is having family or business relationship with an official or employee of HPIL who can influence the performance, in whole or in part, of a Contract.
- 4.4. Protection of technology, information, assets and intellectual property:** The secure use and distribution of information, data, technology, assets and intellectual property in the workplace is critical to HPIL and Supplier's success in a competitive marketplace. Assets include tangible assets such as equipment and vehicles, systems, facilities, materials, and resources as well as intangible assets such as Intellectual Property Rights, Processes, Know how & Technology, proprietary information etc. Both parties must maintain physical and electronic security for all technology, information, assets and intellectual property.
- 4.5. Accounting and Reporting:** Suppliers shall ensure that their accounting and financial records meet the highest standards of accuracy and completeness. All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records shall show the nature of all transactions in a correct and non-misleading manner.
- 4.6. Confidentiality:** Suppliers shall not use or disclose confidential information of HPIL acquired under Contract by itself or its employees, affiliates, ("Representatives") to any third party. The confidential information also extends to any employee data, personal data or third-party information as shared by HPIL. If confidential information is to be discussed or exchanged between HPIL and the Supplier, or the Supplier and its Representative, the Parties must first sign a Confidentiality or Non-Disclosure Agreement and comply with it. The Suppliers shall take appropriate measures by instruction prior to disclosure to such employees, affiliates to assure against unauthorized use or disclosure. The Suppliers agree to notify the HPIL promptly if it learns of any use or disclosure of the HPIL Confidential Information in violation of this SCC.
- 4.7. Intellectual Property and technology:** The Supplier shall take appropriate steps to safeguard and not infringe any HPIL intellectual property/ technology which come to its knowledge during the course of its business relationship/ dealings with HPIL. The Suppliers shall not be authorized to represent HPIL or to use HPIL brands, intellectual properties without the written permission of HPIL.
- 4.8. Prohibition on Insider Trading:** HPIL complies with SEBI (Prohibition of Insider Trading) Regulations, 2015. During the course of engagement, if the Supplier becomes aware of any Unpublished price sensitive information ("UPSI") relating to HPIL, The Supplier of HPIL shall

not communicate such UPSI nor trade in securities of HPIL that are listed when in possession of UPSI, in violation of applicable securities laws.

- 4.9. Regulatory and Tax Law Compliances:** The Suppliers shall while conducting their business comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which they operate and also comply with applicable tax laws and regulations.
- 4.10. Misrepresentation:** Supplier shall not make false statements or provide misleading information regarding its products, services or performances, including safety and environmental attributes of the product or services.
- 4.11. Political Involvement:** Supplier shall ensure that they do not give an impression of representative or being the spokesperson while getting associated with any political party or political activities in their personal capacity.
- 4.12. Fair Competition Practices:** Suppliers shall compete fairly, ethically and within the framework of all applicable competition and anti-trust laws. They shall not exchange HPIL related confidential and sensitive information with competitors, peers or customers in any way that will improperly influence the marketplace or outcome of a bidding or negotiation process.

5. Supply Chain

HPIL is committed to working in partnership with our Suppliers to realise the full value of our relationships and to positively contribute to our stakeholder communities and expects its Suppliers must adopt similar principles to those outlined in this Supplier Code of Conduct in dealing with their own Suppliers.

6. Conflict between contract and SCC

In the event of a conflict between the terms of the contract, PO or any other document executed with Suppliers and SCC, SCC shall prevail. The SCC shall be incorporated into and be considered part of the contract or document executed with Suppliers.

7. Administration of the Code

Every Supplier has an obligation to comply with this Code and with all such laws, rules and regulations applicable to HPIL. This document forms an integral part of the agreement between HPIL and the supplier/vendor. HPIL shall provide this Code of Conduct to each supplier and vendor as a part of the agreement. Each supplier shall confirm the receipt of this Code of Conduct and commit to comply with it in letter and in spirit. HPIL reserves the right, upon reasonable notice, to check compliance with the requirements of this Code of Conduct. Failure to adherence to this code would attract disciplinary consequences including termination of business association.

8. Corrective Action process

Suppliers shall establish and continue to operate at all times a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
