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| <b>Name of the Document: Supplier Code of Conduct</b> |  |
| <b>Doc No. PITTI/PURCHASE/04</b>                      | <b>No. of Pages: 1 of 6</b>                            |
| <b>Effective Date: 1<sup>st</sup> January 2024</b>    | <b>Next Review Date: 31<sup>st</sup> December 2026</b> |

We at **Pitti Engineering Ltd. (PEL)**, Promote Sustainable Procurement by encouraging the purchase and use of materials, products and services that best align with the PEL’s Quality, Environmental, Energy, Occupational Health & Safety, Social, Information security, Economic and Performance goals.

This Supplier Code of Conduct (the “Code”) applies to all suppliers/contractors (and their sub-suppliers) of goods or services to **PEL**, Incorporated and its affiliates (collectively, “PEL”). This Code is considered an integral part of **PEL**’s business relationship with its suppliers and forms a part of any contract or agreement between PEL and its suppliers/contractors. All suppliers/ contractors are expected to meet the standards of conduct expressed in this Code. All suppliers must sign the Compliance Certificate and are subject to audit by **PEL** to ensure compliance with these standards. Any failure to sign the Compliance Certificate or to comply with this Code will constitute a breach of any contract or agreement between **PEL** and the supplier may result in corrective action up to and including termination of contractor agreement.

### **I. Integrity**

A supplier should not offer any gift, gratuity, or any form of privilege to any PEL employee. Gifts, meals, or entertainment are permitted only if they are ordinary and reasonable, of limited value, consistent with accepted business practices and accepted ethical standards, and do not violate any law. PEL requires all of its suppliers to comply with the Indian law and encourages its suppliers to maintain a compliance program. PEL also requires all of its suppliers to comply with all applicable laws in other countries as applicable concerning bribery, corruption, and related matters.

### **II. Compliance with applicable law**

- Each supplier must comply with the applicable legal requirements and standards under the laws of each country in which the supplier operates. This includes, but is not limited to, the laws and regulations governing the following: environmental standards, health, safety, employment, child labor, forced labor, sexual harassment, human trafficking, and discrimination, freedom of association and collective bargaining, and human rights.
- Suppliers must not use forced labor or engage in or support human trafficking.
- Each supplier must ensure its products comply with applicable legal requirements in each country (1) where the supplier’s products are delivered to PEL or (2) where PEL has notified the supplier that the supplier’s products will be sold.

### **III. Environmental, Health and Safety & Energy**

- Each supplier must comply with applicable environmental, health and safety standards.

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- Each Supplier must provide safe and healthy working conditions for its employees.
- Each Supplier is required to actively support PEL in minimizing potential adverse environmental, energy, health and safety impact during the various phases of the life of the PEL products from development to disposition through manufacturing, disposition and usage.
- The supplier shall take care, without being requested to do so, that energy, natural resources and raw materials required for processing and in the execution of services are used in such a way that resources are conserved.
- We examine energy aspects when procuring and purchasing products, facilities and services which have significant energy relevance. In doing so, the evaluation of energy-related performance as well as the expected serviceable life of the energy-consuming products, facilities and services to be procured is taken into account.
- In cases where offers are the same, companies with a certified SA 8000, Environment, OHS, energy management system will be given preference.
- The Supplier undertakes to pay attention to energy efficiency in his products/services and to avoid unnecessary waste of energy and, if possible, to orientate himself according to the latest technology on energy efficiency.
- In case the Supplier delivers goods that contain substances, which, at the time of the formal order, are subject to statutorily imposed substance restrictions and/or information requirements (e.g. REACH, RoHS, etc.), then the Supplier must declare such substances, upon delivery of those products at the latest, insofar as the relevant laws and regulations apply at the designated delivery point.

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#### **IV. Social Compliances**

PEL has adopted the Social Accountability requirements as the reference standard for this Code. This standard will eliminate confusion in terms of criteria and definitions of terms.

PEL has selected to reference and focus on the following criteria:

- Child Labor
- Forced Labor (which includes human trafficking)
- Freedom of Association and Right to Collective Bargaining
- Health & Safety
- Discrimination & Sexual harassment
- Disciplinary practices
- Working hours
- Compensation

The requirements of these standards are briefly described for your understanding and reference below.

##### **1) Child Labor**

PEL does not allow child labor under age of 18 years to be used in its supply chain (including PEL's suppliers and their sub-suppliers).

##### **2) Forced Labor and Human Trafficking**

PEL prohibits all kinds of forced or compulsory labor in its supply chain (including PEL's suppliers and their sub-suppliers) under any conditions, including bonded, forced, and/or compulsory prison labor. Full disclosure to workers of terms and conditions of employment must be made and should in no way be linked to workers making payments or becoming indebted in any way.

Suppliers may not, directly or indirectly, engage in or support trafficking in human beings. Suppliers may not, directly or indirectly, recruit, transfer, harbor or receive any worker by means of threats, force, coercion or deception.

##### **3) Freedom of Association and Right to Collective Bargaining**

Suppliers shall respect the right for, and not interfere with, workers in forming, joining, organizing, representing, and administering trade unions of their choice and bargaining collectively with the supplier, to the extent of the law. Management of suppliers must ensure workers and representatives are not subjected to discrimination, harassment, intimidation, or retaliation for participating in unions.

##### **4) Health & Safety**

Suppliers must ensure workers have a safe, healthful and hazard free workplace where adequate preventive measures are taken to avoid health and safety hazards and accidents both

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in short and long term. Workers should be able to perform their functions throughout their adult lifetime without actual or latent occupational health damage. Management of suppliers is responsible for workplace and dormitory (if applicable) conditions and therefore, for ensuring that worker training and the overall occupational health and safety program is effective.

### **5) Discrimination**

PEL requires suppliers to seek to ensure equal treatment for all workers in all matters. Employees will be employed, trained, promoted and compensated solely on the basis of their capacity to perform the job and they will be free from all types of incident, verbal, physical and sexual harassment and other discriminatory practices.

### **7) Working Hours**

A regular workweek is defined as 48 hours per week or the number of hours set out by local law, whichever is shorter. Overtime hours must not exceed 12 hours per week, or the maximum number of hours established by local law, whichever is more stringent.

### **8) Compensation**

Wages earned for regular hours worked must be sufficient for the worker to feed, clothe and house the worker and the worker's dependents. Overtime should not be needed to generate a subsistence wage.

### **9) Disciplinary Practices**

Employers must demonstrate respect at all times for each worker's mental, emotional and physical integrity in disciplinary and performance processes. Non-arbitrary and effective procedures must be used for giving written/formal warnings regarding an employee's performance and job security and for dispensing disciplinary procedures if required.

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#### **V. CONFIDENTIALITY**

- The Supplier acknowledges that for the purpose of any transaction under any Purchase Order, it may be necessary for **PEL** to disclose to Supplier, orally, in writing or in any other tangible or intangible form, technical information, including but not limited to, business information or any other information of **PEL** (PEL Information).
- All PEL Information is deemed to be highly confidential. Supplier agrees not to disclose any PEL Information to any third party (except to Supplier's employees, its affiliates and sister companies, on a strictly need to know basis and under written terms of confidentiality at least as protective as those in this clause) without the prior express written consent of PEL and not to use PEL Information for any purpose other than strictly for the execution of this Purchase Order.
- These restrictions upon disclosure and use of PEL Information shall remain in force for perpetuity. All information provided by PEL to the Supplier shall, at all times, remain the sole and exclusive property of PEL

#### **VI. INTELLECTUAL PROPERTY RIGHT**

- Supplier hereby grants to PEL, a non-exclusive, perpetual, irrevocable royalty-free and transferable license to use the intellectual.
- Property right of Supplier/ manufacturer in Goods and any documentation and other supplies provided by Supplier to PEL under or in connection with this Purchase Order, to the extent necessary for the purpose of this Purchase Order.
- Supplier warrants that the Goods do not violate or infringe any rights including intellectual property rights of any person, firm or corporation;
- PEL shall be indemnified and shall remain indemnified by Supplier against any infringement of any third party intellectual property rights of the Goods.

#### **Supplier Policy and Management System Certification**

All suppliers of PEL must have a policy and management system to comply with these requirements. At a minimum, top management must periodically review the adequacy, suitability, and continuing effectiveness of the supplier's policies, procedures, and performance results in meeting the requirements of this Code and other requirements to which the supplier subscribes. System amendments and improvements must be implemented where appropriate.

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### **Additional Information and Certifications; Audits**

All suppliers/Contractors of PEL must provide additional information and certifications regarding the standards addressed in this Code as requested by PEL and must permit PEL or its representatives (including any third-party auditing organization engaged by PEL) to audit its books and records, facilities, and operations to verify compliance with this Code.

PEL must have visibility to its entire supply chain regarding the standards addressed in this Code. Accordingly, all suppliers of PEL must require their suppliers and sub-suppliers to comply with this Code, including the requirements to provide additional information and certification and to permit audits by PEL and its representative.