



Code of Conduct Policy

DOC. NO.: POLICY/HR/003

ISSUE NO.: 01

REV. NO.: 00

EFFECTIVE DATE: 01.07.2021

1. Introduction

This CODE OF ETHICS AND BUSINESS CONDUCT of LEI India Pvt. Ltd serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders we, at LEI INDIA PVT. LTD is committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for the LEI INDIA PVT. LTD (including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor or consultant staff), and also include other organizations who do business with us

LEI INDIA PVT. LTD expects its staff to be impartial and honest in all affairs relating to their job. All staff bear a responsibility in general, to be of good faith and do nothing to destroy the trust necessary for employment

The success of our business is based on the trust we earn from our employees, customers and shareholders We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.

LEI INDIA PVT. LTD is open to any questions at any time and will not allow punishment on retaliation against anyone for reporting misconduct in good faith.

Managers and leaders have higher responsibility for demonstrating, also through their actions, the importance of this Code. Managers and leaders are responsible for promptly addressing every raised ethical question or concern. Employees must cooperate investigations of potential or alleged misconduct

Noncompliance to this Code considered as a misconduct that could warrant disciplinary action, include re-termination of employment or other contract in deserving cases.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners:

➤ Ethical [Principles/Values]

Our core values at LEI INDIA PVT. LTD is:

- Honesty
- Integrity
- Trustworthiness.
- Respect for others.

2. Purpose

This code of conduct is designed to formally put these corporate values of LEI India Pvt. Ltd in to practice. The purpose of this code of conduct is to articulate high standard of honesty, integrity; ethical and law-abiding behavior expected all employees while also meeting the requirements of externals stakeholders and applicable laws.

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3. Scope

The code of conduct is applicable to all employee of LEI INDIA PVT. LTD. It is also applicable to all External Providers of Materials or Services or working with LEI India Pvt. Ltd for any specified period. In essence, anyone representing LEI India Pvt. Ltd or working on the company's behalf is expected to act consistently with the code.

4. Responsibility**4.1. Responsibility of Employees:**

It is the responsibility of each employee to be aware of and abide by the code of conduct elucidate in this document. Additionally, all employees also have the responsibility of behaving/acting in an ethical manner compliant with the applicable laws of the land. Future, each employee is responsible for reporting any violations of the code of conduct they observe within the company to the appropriate authority.

4.2. Responsibility of Management:

In addition to the above, LEI India Pvt. Ltd Management has an additional responsibility to drive a culture of integrity, honesty, ethical and law – abiding behavior among other employee in organization.

Towards this end, they are expected to be a role model of the behavior expected of employees, reinforce the code of conduct as part of regular employee communication, and encourage employees to report violations of the code and guard against taking retaliatory action against someone for making a good faith report.

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5. Policies

5.1. Open Door Communication

LEI India Pvt. Ltd believes that the work environment should be free from any kind of bureaucracy and all employees must have access to other employees regardless of their position or influence in the company or managers are expected to foster and open-door culture at the workplace.



5.2. Prohibition & Remediation of child labor



LEI India Pvt. Ltd strictly prohibits the employment of child labor at its plants and offices. All employees at LEI India Pvt. Ltd responsible for hiring of staff are required to ensure that this principle is up held.

In the event that a child worker is identified at a LEI INDIA PVT. LTD, Child Labor Remediation Plan must be followed.

5.3. Forced labor

The Organization shall not recruit or engage any workmen by force or any other similar means.



5.4. Discrimination and Harassment



We provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type from abuse. No Direct or indirect discrimination or shall take place based on any professionally non relevant trait or circumstance, like gender, marital status, age, national or social or ethnic, origin, color, religion and political opinion, disability sexual orientation, employee representation property, Birth, or other status. Any kind of discriminatory behavior, harassment, bullying or victimization is prohibited.

All staff is expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect and must refrain from any form of harassment, slander or any behavior that could be taken as offensive, intimidating, humiliating, malicious or insulting.

5.5. Privacy, personal Data Protection

LEI India Pvt. Ltd is committed to protecting personal information that is shared by employees during the course of employment, consistent with applicable data privacy laws, including the rules surrounding the collection, processing, use, transfer and disclosure or personal information.

It is expected that employees whose job responsibilities include the collection, modification, transfer,



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processing, storage or use of personal employee information will comply with the applicable data privacy laws and other internal controls on that protect this personal information.

Confidential information unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. The obligation continues beyond the termination of agreement. Employees must use their best efforts to avoid on unintentional disclosure by applying special care when storing or transmitting Confidential information

5.6. Human rights


LEI India Pvt. Ltd recognizes the impotent of maintaining and promoting fundamental human rights in all of our operations and through out our supply chain, our values, codes and employment policies work together to support the principles contained in universal declarations of human rights and the international labor origination's fundamental principles and labor standards.

We operate under the program and policies that: -

- Provide fair and equitable wages, benefits and other conditions of employment are in accordance with local laws.
- An employee is entitled to be paid for hours worked at a salary/rate appropriate for the work performed. If an employee is required or approved to work overtime, the employee is entitled to be paid for the overtime in one way or another (e.g., including lieu time off).
- Provide humane and safe working conditions.
- Prohibit all forms of forced and compulsory labor child labor.
- Promote workplace free of discrimination and harassment.
- Complied with Factory Rules, 1963 for Working Hours, Holidays, Intervals for Rest etc.

We expect our suppliers and business partners to uphold these principles as well as and not be complicit in human rights abuse.

5.7. Code of conduct towards customers & suppliers product stewardship

LEI India Pvt. Ltd recognizes that product integrity, product quality and being safe and environmentally responsible are the founding principles of product stewardship.

Therefore,

the Company is committed to ensuring that its products and manufacturing processes adhere to prescribed quality standard and that technologies used are safe and environmentally responsible across the product life cycle, including its usage by the intended customer.


5.8. Fair competition and Business Conduct

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LEI India Pvt. Ltd will compete fairly in all its markets, within the framework of applicable laws. Towards this end, employees concerned must ensure that they adopt fair Competition Practices in all dealings. This includes the following:

- Never misrepresent or make misleading/untruthful claims about products in the marketplace
- Never resort to fixing prices.
- Never resort to rigging bids.
- Never boycott specific customers/suppliers.
- Only use legitimate means to obtain competitive information.
- Never comment on competitors' products or services in an inaccurate or untruthful manner.

5.9. Conflict of Interests

Our decisions shall be based on objectives and fair assessments avoiding the possibility of any improper influence. A "Conflict of Interest" exists when an employee's personal interest (that can link to e.g., Friends, family or customer competitor, supplier, contractor entity as well) interferes or potentially interferes



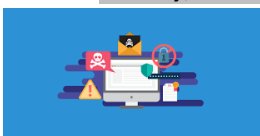
with the best interests of LEI INDIA PVT. LTD, determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management:

Conflict of Interest Could arise;

- Being employed (you or a close family member) by, or being economic relation with an actual or potential customer, competitor, supplier or contractor.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another company or organization.
- Owning or having a substantial interest in a customer, competitor, supplier or contractor.
- Having a personal interest, financial interest or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, this onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

5.10. Security, Protection and Proper use of Company assets



We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment and information are provided for legitimate business use only, occasional personal use is permissible as long as

it is lawful, does not affect job performance or disrupts workplace morale.

All staff obliged to follow appropriate security measures and they should treat company property, whether tangible or intangible with respect and shouldn't misuse company assets or use it carelessly.

5.11. Ethical Decision Making

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Ethical Conduct is a value-driven decision making, several key questions can help to identify situations that may be unethical, inappropriate or illegal, ask yourself;

- Is what am I doing legal?
- Does it reflect our company values and ethics?
- Does it comply with the code and company rules/policies?
- Does it respect the rights of Others?
- How would it look if it made the news headlines?
- Am I being loyal to my family, my company any myself?
- Is this the right thing to do?
- What would I tell my child to do?
- Have I been asked to misrepresent information or deviate from normal procedure?

5.12. **Gifts and Hospitality**

We shall avoid any actions that create a perception that favorable treatment was sought, received or given in exchange for personal benefits.

Business courtesies or benefits include gifts, gratuities, meals, refreshments, entertainment or other advantage from persons or companies with whom we do or may do businesses, we will neither give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies, or would cause embarrassment, our staff may never use personal funds or resources to do something that cannot be done with our resources.

Gifts received through courier or the post, at the reception, or through any other means, should be submitted to the Administration department which shall maintain a record of such gifts received by it and donate them to charity.

However, cards, thank you notes, certificates, or other written forms of thanks and recognition, foods, beverages that are supplied by customers, partners, and vendors or suppliers in the interest of building positive business relationships may be accepted.



5.13. **Compliance with laws, regulations, policies and procedures**



Our Commitment to integrity begins with complying with laws, rules and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude and we do not abuse our rights.

Our staff must follow applicable laws and regulations, including the code at all times and must ensure compliant operation.

5.14. **Sustainability: Society + Environment + Economics**

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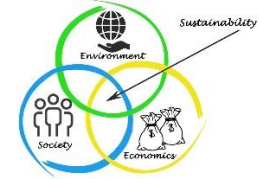
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We are committed to meet current requirements without compromising the needs of future generations. To this, we combine economic, environmental and social factors in our operation & our business decisions.



5.15. Health, Safety and Environment



We provide clean, safe and healthy work environment and we are dedicated to maintaining it. We are committed to minimize the impact on the natural environment of our operations. We make efforts to reduce the used of finite resources. Like energy or water, and the harmful emissions like waste.

All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.

We comply with defined EHS Policy to sustain HSE.

5.16. Bribery & Corrupt Practices (named as prohibition bribery and corruption)

We firmly condemn and do not tolerate all forms of corruption it is prohibited directly or indirectly offering, promising, giving asking, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business. An unfair advantage or benefit may include cash, any cash

equivalent e.g., voucher), gift, credit, discount, travel, personal advantage, accommodation of services. We do not permit facilitation payments to government officials or private business in order to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that s/he improperly influences a decision maker.

Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business is considered gross misconduct. Similarly accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff has to account for all benefits received in the course of doing business and must to not give or receive bribes or otherwise act corruptly.



5.17. Freedom of Association

LEI INDIA PVT. LTD, committed to Freedom of association, as defined in our Code of Conduct. We do not restrict any workmen to form or join any trade union of their choice and do not follow unfair labor practices.

LEI India Pvt. Ltd has constituted work committee and all workmen are allowed to participate in work committee.

works committee at this organization is allowed to meet regularly (once in a Three months) on the issue



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pertaining to their problems. They are also allowed to discuss with the management on the issues so discussed in their meetings.

We provide full cooperation and appropriate responses to environment; workers health safety and social issues highlight at workplaces. We provide protection against discrimination action.

5.18. Bookkeeping, True Reporting and Financial Integrity

Our books, records, accounts and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.



We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipt or accounting fake expense invoices. All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All staff must not improperly influence, manipulate or mislead any audit.

5.19. No Land Grabbing

At LEI India Pvt. Ltd, we complied with Gujarat Land Grabbing (Prohibition) (Amendment) Bill-2022.

Land Acquisition for Plant done as per *Land Acquisition, Rehabilitation and Resettlement Act and LEI India Pvt. Ltd* compensate the affected land owners for their rehabilitation and resettlement.


5.20. Anti-Money Laundering

We are committed to fully complying with all applicable anti-money laundering (AML) and terrorist finance laws, rules and regulations. You must not participate in or facilitate money laundering; doing so, even unintentionally, could result in civil and criminal penalties against you.



Therefore, you must:

- Know your AML responsibilities by familiarizing yourself with the Anti-Money Laundering Policy.
- Be alert to and promptly report any unusual or potentially suspicious activity (including activity that has already occurred or was attempted) that could involve money laundering or terrorist financing, has no apparent business or lawful purpose or is not the type of transaction in which a client normally would be expected to engage, including activity involving a client's source of funds.
- To report potentially suspicious activity, inform the Managing Director.

6. Violation of the Code (Reporting Concerns):

Each employee must report actual or potential violation of this code of conduct to Director on Mentioned Contact Details. All such reports of violation shall be treated as protected disclosures under Whistleblower Policy. The Protected Disclosure should be submitted in a closed & secured envelope with "Protected

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disclosure under the whistle blower policy". Alternatively, the same can also be sent through email with the subject "Protected disclosure under the Whistleblower policy".

The disclosure should be addressed to

Director: Chayanika Chatterjee

E-Mail: info@leiindias.com

6.1. Investigation:

All protected disclosures under this policy will be recorded and thoroughly investigated as outlined in the "Whistleblower Policy".

6.2. Consequences for Proven Violation:

Violations of this Code, Company Policy or the law will attract disciplinary action up to and including termination. Violations also include any false allegations, regardless of whether they are made anonymously. Legal and ethical misconduct can also subject the individuals involved and LEI India Pvt. Ltd to fines, penalties and civil or criminal prosecutions.

7. Amendments:

The company is committed to continuously reviewing and updating its policies and procedures. Therefore, the company reserves its right to amend, alter or terminate this code at any time and for any reason, subject to applicable law.

This Code of Conduct is not exhaustive and lays down only the general principles to be followed by all persons as covered under the code. The company may have separate codes/policies formulated for regulating various matters that may be required under the specific laws. The parties shall be responsible for adhering to such additional codes/policies as may be applicable to them.

8. Review Frequency

Once in a 03 Year