

Plant I : A-26 & 27, M.I.D.C., Ambad, Nashik - 422 010. Maharashtra State, India.
Regd. Office & Plant II : H-107, M.I.D.C., Ambad, Nashik - 422 010. Maharashtra State, India.
Tel.: +91-253-2381065 CIN-U25110MH2000PTC123743
www.innovarubbers.com

Title: Supplier Code of Conduct			
Document No	Date of Issue	Revision No	Revision Date
IR/HRP/18	14-09-2023		

POLICY OBJECTIVE

Sustainability is a key element of Innova Rubbers Pvt. Ltd. values and forms an integral part of its business strategy. To meet their social responsibilities, suppliers are expected to conduct their business in an ethical manner and act with integrity.

Ethical requirements include the following aspects:

1) ETHICS

Business Integrity

Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers are expected not to offer to Innova Rubbers Pvt. Ltd. employee's gifts or any other kind of personal benefit resulting from the relationships with the suppliers

Fair Competition

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

Privacy & Intellectual Property



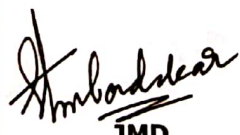

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

Identification of Concerns

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed.

Conflict Minerals

Suppliers are expected to ensure that products supplied to Buyer do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or

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indirectly finance or benefit armed groups.

2) LABOUR

Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect. This includes the following aspects:

Child Labour Avoidance

Innova Rubbers Pvt. Ltd does not tolerate child labour in our supply chain. Suppliers should avoid any sort of child labour in their business operations.

Freely Chosen Employment

Innova Rubbers Pvt. Ltd does not tolerate slavery, servitude and forced or compulsory LABOUR and human trafficking in our supply chain. Bonded, indentured or involuntary prison LABOUR is not accepted as well.


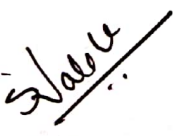

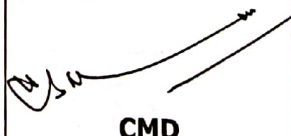
Diversity and Inclusion

Equal treatment of all employees will be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law. Suppliers will ensure that their employees are not harassed in any way. Innova Rubbers Pvt. Ltd encourages suppliers to provide an inclusive and supportive working environment and to exercise diversity when it comes to their employees as well as in their decisions to select subcontractors.

Fair Treatment

Suppliers will provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

Furthermore, suppliers are expected not to unfairly terminate any employment contract or without clear evidence specify that the termination of an employment contract, in relation to the working performance of an employee, is permitted by law.

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Working Hours, Wages and Benefits

Working hours for suppliers' employees will not exceed the maximum set by the applicable national law. Compensation paid to employees will comply with applicable national wage laws and ensure an adequate standard of living. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure will not be permitted (this does not exclude the entitlement of damages on a contractual or legal basis). Suppliers are expected to provide their employees with fair and competitive compensation and benefits.

Freedom of Association

Suppliers will be committed to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, suppliers will respect the rights of their employees to associate freely, join LABOUR unions, seek representation, join works councils and engage in collective bargaining. Suppliers will not disadvantage employees who act as workers' representatives.

3) HEALTH, SAFETY, ENVIRONMENT AND QUALITY

Suppliers are expected to provide a safe and healthy working environment and to operate in an environmentally responsible and efficient manner. Suppliers will integrate quality into their business processes.


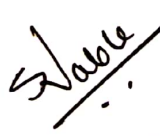
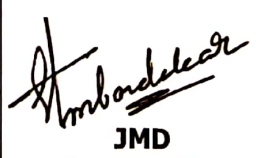
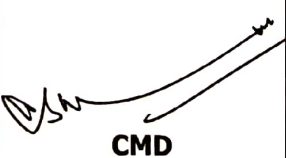
This comprises the following aspects:

Quality Requirements

Suppliers will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Innova Rubbers Pvt Ltd. Company's needs, perform as warranted and are safe for their intended use.

Health, Safety, Environmental and Quality Regulations

Suppliers will comply with all applicable quality, health, safety and environmental regulations. All required permits, licenses and registrations will be obtained, maintained and kept up-to-date. Suppliers will fulfil their operational and reporting requirements.

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Product Safety

Material safety data sheets containing all necessary safety-relevant information will be made available by suppliers for all hazardous substances and will be provided to Innova Rubbers Pvt Ltd. and other parties in case of a legitimate need.

Occupational Health and Safety

Suppliers will protect their employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees. Suppliers will provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace. When hazards cannot be adequately controlled by these means, suppliers will provide employees with appropriate personal protective equipment.

4) QUALITY MANAGEMENT SYSTEM

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

Legal and Other Requirements

Suppliers will comply with all applicable laws, regulations, contractual agreements and generally recognized standards.

Communication of Sustainability Criteria in Supply Chain


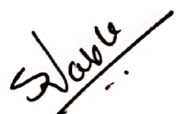
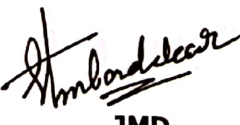

Suppliers will communicate the principles set forth in this Supplier Code of Conduct to their supply chain.

Commitment and Accountability

Suppliers are encouraged to fulfil the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources.

Training and Competency

Suppliers will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier

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Code of Conduct, the applicable laws and regulations and generally recognized standards.

Continuous Improvement

Suppliers are expected to continuously improve their sustainability performance by implementing appropriate strategies, adopting new technology, fostering stakeholder satisfaction, and analyzing progress.

Process Safety

Suppliers will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process. For hazardous installations the supplier will conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

5) SUPPLIER GRIEVANCE REDRESSAL INDEPENDENT AUTHORITY

Independent Authority





The Independent Authority shall be a person authorized by the Directors of the Innova Rubbers Pvt. Ltd for the purpose of receiving all complaints under this policy and ensuring appropriate action.

Reporting

The contact details of independent authority shall be communicated to all vendors /supplier by email and the same shall also be published on the Innova Rubbers Pvt. Ltd's website for the purpose of raising the concern/ complaint. Any vendors / supplier intending to raise a concern and / or complaint against any particular employee of the Innova Rubbers Pvt. Ltd. shall raise the same with the nominated Independent Authority on the contact details published.

Investigation Process

All complaints received shall be recorded and looked into by the Independent Authority. If initial enquiries by the Independent Authority indicate that the concern has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision would be documented. The Independent Authority shall have the sole discretion to decide whether the concern / complaint need an investigation after discussion / deliberations

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with the Directors. Where initial enquiries indicate that further investigation is necessary, this shall be carried through either by the Independent Authority alone, or by a Committee nominated by the Independent Authority for this purpose. The investigation shall be conducted in a fair manner using the principle of natural justice, without presumption of guilt of the suspect. After concluding the enquiry proceedings, the Independent Authority shall submit its written report of findings along with their recommendations for appropriate course of action to the Directors.

Investigation Result

Based on the report of findings and recommendations, the Directors shall decide appropriate course of action and communicate their decision to HR department for execution. The decision of the Directors shall be binding on all the parties. The decision shall be communicated to the vendor / Supplier by the Independent Authority.

Annexure I provide the necessary contact details of the Independent Authority.

Independent Authority Name: Mr. Yusuf Bootwala

Contact No: +91 7720091747

E-mail: yusuf.bootwala@innovarubbers.com

Address: H- 107, MIDC, Ambad, Nashik – 422010.

NOTICE OF ACCEPTANCE AND AGREEMENT

Hereby agrees to abide by the requirements stipulated in the Supplier Code of Conduct.


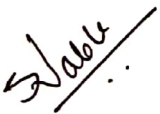
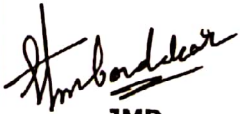

Name: _____

Company Stamp:

Designation: _____

Signature & Date:

(Please sign either the forward page or the acknowledgement email to confirm your agreement with Sourcing - Innova Rubbers Pvt Ltd.)

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