Supplier Code of Conduct





menon and menon ltd

April, 2023

Preface

As a responsible and ethical company, we understand the importance of promoting sustainable and

ethical practices throughout our supply chain. We recognize that our suppliers play a crucial role in

achieving our goals of social responsibility and sustainability. Therefore, we have developed a

Supplier Code of Conduct that outlines our expectations for ethical and sustainable practices among

our suppliers. This policy serves as a guide for our suppliers to ensure that they adhere to our high

standards for working conditions, health and safety, compensation, and environmental

responsibility. By implementing this policy, we aim to create a more sustainable and responsible

supply chain that benefits all stakeholders, including our employees, customers, suppliers, and the

environment. We believe that by working together with our suppliers, we can create a positive

impact on society and build a better future for all.

Supplier Code of Conduct

A supplier code of conduct is a set of guidelines that outlines ethical and sustainable practices

expected from all suppliers. It is important for suppliers to follow the code of conduct because it

ensures that they operate in a socially responsible and sustainable manner. By following the code of

conduct, suppliers can ensure that their operations do not harm the environment or violate human

rights, and they contribute positively to the community. Furthermore, by adhering to the code of

conduct, suppliers can build a strong and sustainable business relationship with the company,

improve their reputation, and attract more customers who value sustainability and ethical practices.

Overall, the supplier code of conduct serves as a tool for ensuring that our supply chain operates in

an ethical and sustainable manner and creates a positive impact on society and the environment. By

partnering with our suppliers and conducting regular audits, we aim to promote transparency,

support ethical business practices and contribute to the well-being of communities impacted by

conflict mineral and human abuse.

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1. Labour Practices and Standards

At menon and Menon ltd, we believe that all workers, regardless of their background or position, should be treated with dignity, respect, and fairness. As part of this commitment, we have implemented a labour practices policy that requires our suppliers to adhere to all applicable labour laws and regulations, including those related to wages, working hours, child labour, forced labour, and discrimination. We insist our suppliers to follow the rules and regulations mentioned in ANNEXURE-A as a minimum requirement.

The detailed description of the requirements in each category is given below:

1.1 No Child labour policy

Our company strongly believes in upholding ethical and sustainable practices in all aspects of our operations, including our supply chain. Therefore, we have implemented a strict no child labour policy at the supplier end. This means that we will not engage in any business activities with suppliers who use child labour or who do not comply with local and international laws and regulations regarding child labour. We recognize that child labour is a serious violation of human rights and can have long-term negative effects on the physical, emotional, and social development of children. We will continue to monitor our supply chain and take swift action against any suppliers who violate our no child labour policy.

1.2 No discrimination practices

Our company values diversity and inclusivity, and we strive to ensure that all individuals, regardless of their race, ethnicity, gender, religion, age, or any other personal characteristic, are treated with respect and dignity. As part of our commitment to promoting fair and equal treatment, we have implemented a strict no discrimination policy at the supplier end. This means that we expect all of our suppliers to provide equal opportunities to their employees, without discrimination or harassment of any kind.

1.3 Health and safety standards

The health and safety of our employees, customers, and suppliers is of utmost importance to our company. We are committed to ensuring that our operations and supply chain meet high health and safety standards. As part of this commitment, we

have implemented a policy that requires all of our suppliers to adhere to strict health and safety standards at their facilities. This includes providing a safe and healthy working environment for their employees, implementing proper safety protocols and procedures

1.4 Working conditions

Our company is committed to upholding ethical and sustainable practices in all aspects of our operations, including our supply chain. Therefore, all of our suppliers to provide fair and humane working conditions for their employees. This includes providing fair wages, reasonable working hours, safe and healthy working conditions, and access to necessary resources and training. We recognize that fair and humane working conditions are essential for the well-being of employees and the long-term success of our business.

1.5 Working hours

Our company is committed to ensuring that all employees in our supply chain are treated fairly and with dignity. As part of this commitment, we have implemented a policy that requires our suppliers to adhere to reasonable working hours for their employees. We recognize that excessive working hours can have negative effects on employees' physical and mental well-being, as well as their productivity and job satisfaction. Therefore, we require our suppliers to comply with local and international laws and regulations regarding working hours, including limits on the number of hours worked per day and per week. We recognize that reasonable working hours are essential for the well-being of employees and the long-term success of our business.

1.6 Compensation

Our company is committed to ensuring that all employees in our supply chain are compensated fairly and equitably for their work. Therefore all our suppliers are required to provide fair wages and benefits to their employees. We recognize that fair compensation is essential for the well-being of employees and their families, as well as the long-term success of our business. Therefore, we require our suppliers to comply with local and international laws and regulations regarding compensation, including minimum wage laws and laws related to benefits such as healthcare and retirement savings. We also encourage our suppliers to provide additional benefits and opportunities for professional development to their employees. We recognize that fair

compensation is a fundamental right of all employees and a key factor in building sustainable and ethical supply chains.

1.7 Right to association

Our company is committed to promoting and respecting the right to association of all workers in our supply chain. As part of this commitment, we have implemented a policy that prohibits any form of discrimination or retaliation against workers who exercise their right to association. We believe that workers have the right to freely and voluntarily associate with others, form and join trade unions or workers' organizations, and bargain collectively. We require our suppliers to comply with local and international laws and regulations regarding the right to association, and we encourage them to support workers' efforts to organize and collectively bargain for their rights.

1.8 Freely choose employment

Our company is committed to promoting and respecting the right to freely choose employment of all workers in our supply chain. We believe that all workers have the right to work voluntarily, without any form of coercion, intimidation, or exploitation. We require our suppliers to comply with local and international laws and regulations regarding the right to freely choose employment, and we encourage them to create a safe and fair working environment that respects workers' rights and dignity. We recognize that forced labour and human trafficking are serious violations of human rights and have no place in our supply chain. We will continue to monitor our supply chain and work together with our suppliers to ensure that workers' rights to freely choose employment are protected and respected at all times.

2. Environmental policy

2.1 Product and material use

We believe that reducing the environmental impact of our products and operations is essential for building a sustainable future for all. We require our suppliers to comply with local and international laws and regulations regarding environmental protection, and we encourage them to adopt sustainable practices, such as reducing waste, using renewable energy sources, and minimizing the use of harmful chemicals. We also encourage our suppliers to use environmentally friendly products and materials wherever possible, and to ensure that their products meet our high standards for sustainability and environmental responsibility. We recognize that environmental responsibility is a shared responsibility and a key factor in building sustainable and ethical supply chains.

2.2 Transportation technology

The measurement and control of environmental impact of transportation systems is essential for building a sustainable future for all. We require our suppliers to comply with local and international laws and regulations regarding environmental protection, and we encourage them to adopt sustainable transportation practices, such as using fuel-efficient vehicles, reducing the number of vehicles on the road, and optimizing transportation routes to minimize emissions. We recognize that transportation is a significant source of greenhouse gas emissions and air pollution, and that we all have a responsibility to reduce our impact on the environment.

3. Ethics

3.1 Anti-corruption

We require our suppliers to conduct their business with the highest standards of integrity and to comply with all anti-corruption laws and regulations. We encourage them to implement effective anti-corruption measures and to disclose any potential or actual conflicts of interest. We recognize that preventing corruption is essential for building ethical and sustainable supply chains and we will monitor our supply chain for compliance.

3.2 Fair business practices

Our company is committed to promoting fair business practices in our supply chain and to ensuring that our suppliers operate in an ethical and transparent manner. We believe that fair competition and transparent business practices are essential for building trust with our customers and stakeholders, and for promoting a level playing field for all suppliers. We require our suppliers to comply with all applicable laws and regulations regarding fair competition and anti-trust, and we expect them to operate with transparency and honesty in their business dealings. We recognize that fair business practices are a shared responsibility and a key factor in building ethical and sustainable supply chains.

3.3 Partner relationships

Our company values strong and ethical partner relationships with our suppliers, and we believe that building and maintaining such relationships are critical to achieving our sustainability goals. As part of this commitment, we have implemented a policy that requires our suppliers to foster ethical and respectful partnerships with our company and other stakeholders. We expect our suppliers to operate with honesty, integrity, and transparency, and to comply with all applicable laws and regulations governing their business relationships. We also expect our suppliers to respect the rights of workers, communities, and the environment, and to work collaboratively with us to address any issues or concerns that arise. We believe that a strong and ethical partnership between our company and our suppliers is essential for promoting sustainable business practices, fostering innovation, and driving long-term growth. Therefore, we will continue to work

with our suppliers to promote ethical and respectful partnerships and to monitor our supply chain for compliance with our policies and standards

4. Review and documentation policy

4.1 Review and monitor

Our company is committed to ensuring that our suppliers adhere to our policies and standards, including our documentation policy. Therefore, proper documentation is essential for ensuring compliance with applicable laws and regulations, mitigating risks, and promoting transparency and accountability. We require our suppliers to make their documentation available to us upon request, and we reserve the right to audit their documentation at any time to ensure compliance. We also encourage our suppliers to implement effective documentation management systems and to report any potential discrepancies or issues with their documentation. We recognize that reviewing and monitoring documentation is critical to maintaining ethical and sustainable supply chains.

5. Safety

At menon and menon ltd, we prioritize the safety and well-being of all individuals involved in our supply chain, including our suppliers and their workers. We believe that a safe working environment is essential for promoting ethical and sustainable business practices, and we are committed to working with our suppliers to ensure that their operations are safe and compliant with all applicable health and safety laws and regulations. Therefore we insist our suppliers to follow the rules and regulations mentioned in ANNEXURE-B as a minimum requirement.

ANNEXURE-A

(Rules and Regulations)

- 1. The contractor shall comply with following act.
 - 1. The Payment of Wages Act, 1936
 - 2. The Minimum Wages Act, 1948
 - 3. The Factories Act, 1948
 - 4. The Employees' State Insurance Act, 1948
 - 5. The Bombay Labor Welfare Funds Act, 1953
 - 6. The Employees' Provident Funds (Misc. Provisions) Act, 1952
 - 7. The Payment of Bonus Act, 1965
 - 8. The Contract Labour (Regulation & Abolition) Act, 1970
 - 9. The Payment of Gratuity Act, 1972
 - 10. The employee compensation Act.
 - 11. The Equal Remuneration Act, 1976
 - 12. The Child Labour (Prohibition & Regulation) Act, 1986
 - 13. The Maharashtra State Profession Tax Act, 1975
 - 14. The Maharashtra Workmen's Minimum HRA Act, 1983.
 - 15. The building and other construction workers (Regulation of Employment and Conditions of services) Act, 1996.
- 2. This is prime responsibility of contractor to submit all risk insurance policies of employee/workers under the contract at menon and menon ltd
- 3. The contractor should be made a contract agreement with menon and menon ltd
- 4. The contractor should submit the details of his subcontractor to menon and menon ltd before engaging at work site. The said contractor is responsible for his subcontractors work and compliances.
- 5. Work permit is mandatory and this is responsibility of contractor to take work permit from safety department of menon and menon ltd, without it no work shall be carried out.
- 6. Gate entry is restricted without complying above conditions.
- 7. You have to follow menon and menon ltd.'s safety rules and regulation as per attached annexure.

ANNEXURE-B

SAFETY CODE OF PRACTICES FOR THE SUB-CONTRACTORS

- 1. No workmen below 18 years and above 58 years of age shall be engaged for a job.
- All workmen shall be screened before engaging them on the job. Physical fitness, height or
 other dangerous location to be ensured before engaging the person on work. The final
 decision rests with the site management to reject any person on the ground of physical
 fitness.
- 3. Sub-contractors shall ensure adequate supervision at workplace. They shall ensure that all persons working under them shall not create any hazard to self or to co-workers.
- 4. Nobody is allowed to work without wearing personal protective equipment.
- 5. No one is allowed to work at or more than two meter height without wearing safety belt to firm support preferably at shoulder level.
- No one is allowed to enter into workplace and was at site without adequate foot protection.
- 7. Usage of eye protection equipment shall be ensured when workmen are engaged for grinding, chipping, welding and gas-cutting. For other jobs as and when site safety coordinator insist eye protection has to be provided.
- 8. All PPE like shoes, helmet, safety belt etc. shall be arranged before starting the job as per recommendation of site safety coordinator.
- 9. All the dangerous moving parts of the portable/fixed machinery being used shall be adequately guarded.
- 10. Adequate illumination at workplace shall be before starting job at night.
- 11. Ladders being used at site shall be adequately secured at bottom and top, ladders shall not use as work-platform.
- 12. Erection zones and dismantling zones shall be barricaded and nobody will be allowed to stand under suspended load.
- 13. Horseplay is completely prohibited at workplace. Running at site is completely prohibited except in case of emergency.
- 14. Material shall not be thrown from heights. If required the area shall be barricaded and one person shall be posted outside the barricade for preventing the trespassers from entering area.
- 15. Other than the electricians with red helmet no one is allowed to carry out electrical connection, repairs electrical equipment or other jobs related thereto.

- 16. Power supply shall be taken through earth leakage circuit breakers (ELCB) of 30 mile ampere sensitivity.
- 17. Inserting of bare wire for power from electrical socket is completely prohibited.
- 18. All major, minor accidents and near misses to be reported to site in charge/Site safety coordinator to enable the management to take necessary steps to avoid the recurrence.
- 19. All scaffolding/ work-platforms shall be strong enough to take the expected load. The width of the working platform and fall protection arrangements shall be maintained as per recommendation of site safety coordinator.
- 20. All tools and tackles shall be inspected before use. Defect to be reported immediately. No lifting tackles to be used unless it is certified by the concern P & M engineers/ safety coordinator.
- 21. Good housekeeping to be maintained. Passages shall not be blocked with materials.

 Material like bricks shall not stacked to the dangerous height at workplace.
- 22. Debris, Scrap and other materials to be cleared from time to time from the workplace and at the time of closing of work every day.
- 23. Contractor shall ensure that all their workmen are following safety practices while traveling in the company's transport and staying at company's accommodation.
- 24. Adequate firefighting equipment shall be made available at workplace and techniques with the coordinator of site safety.
- 25. All the unsafe condition, unsafe acts identified by contractors, reported by site safety supervisors or safety personnel to be corrected on priority basis.
- 26. No children shall allow entering the workplace.
- 27. Female workmen not allowed to work on height and other high risk areas.
- 28. Other than the driver/operator, no one shall travel in a tractor/tough rider etc.
- 29. It is responsibility of every contractor to prohibit any nuisance arising from his employees.
- 30. Contractor should not be appoint ill or sleep walk diseased person.
- 31. Contractor must take emergency contact number of each workman for emergency contact.
- 32. If any contract labour met with an accident during working hours then company will provide treatment to said injured & hospital/medical expenses will be bare by company & contractor i.e. 50% company & 50% contractor.
- 33. Workmen should not be appointing without safety & induction training.
- 34. Ensure that basic trainings are provided to the workers who are actually working in company premises

- 35. Ensure that company manufacturing product and process knowledge is provided to the concern employees.
- 36. Ensure that past relevant work experience is available.
- 37. We will neither tolerate nor condone behaviour that is likely to undermine the dignity or self-esteem of an individual, or create an intimidating, bullying, victimization, harassment, horseplay, hostile or offensive environment.