

<b>SIPL</b>	<b>HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS</b>	Document No: Annexure 06
		Revision No: 02
	<b>Code of Ethics and Business Conduct</b>	Revision Date: 01.01.2024

Our commitment to ethical behaviour and the solid ethical foundations are one of the most essential components of **Sunvisors India Private Limited** operation.

We are committed to doing business the right way, based on a culture of ethics and compliance.

**Introduction**

This CODE OF ETHICS AND BUSINESS CONDUCT of **Sunvisors India Private Limited**. serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, at **SIPL** are committed to doing business legally, ethically and in a transparent manner.

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

**SIPL** 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.

**SIPL** is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a 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 in investigations of potential or alleged misconduct.

Non-compliance to this Code considered as a misconduct that could warrant disciplinary action, including 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.

			9
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	

<b>SIPL</b>	<b>HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS</b>	Document No: Annexure 06
		Revision No: 02
	<b>Code of Ethics and Business Conduct</b>	Revision Date: 01.01.2024

### 1. Purpose

Our Employee Code of Conduct company policy outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

### 2. Scope

This policy applies to all our employees regardless of employment agreement or rank.

### 3. Responsibility

Top management has authorized Head HR to ensure the implementation of this code of conduct. Member Secretary will be coordinating any investigations related to violation of this code of conduct and recommend disciplinary actions.

### 4. Our Code of Ethics and Business Conduct

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

#### 1. Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

#### 2. Respect in the workplace.




All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment, or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

#### 3. Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse company equipment or use it frivolously.
  - Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
- Employees should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

			10
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	

<b>SIPL</b>	<b>HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS</b>	Document No: Annexure 06
		Revision No: 02
	<b>Code of Ethics and Business Conduct</b>	Revision Date: 01.01.2024

**4. Professionalism**

All employees must show integrity and professionalism in the workplace:

- **Personal appearance**

All employees must follow our dress code and personal appearance guidelines.

- **Corruption**

We prohibit employees from accepting gifts from clients or partners. We prohibit briberies for the benefit of any external or internal party.

- **Job duties and authority**

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our company.

- **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But generally, we expect employees to be punctual when coming to and leaving from work.

- **Conflict of interest**

We expect employees to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties.

- **Collaboration**




Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All employees must be open for communication with their colleagues, supervisors or team members.

**5. Transparent Management and Anti-Corruption**

We are committed to conducting our business with transparency, honesty, and integrity and prohibit all forms of corruption, including bribery, extortion, and kickbacks.

			11
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	

<b>SIPL</b>	<b>HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS</b>	Document No: Annexure 06
		Revision No: 02
	<b>Code of Ethics and Business Conduct</b>	Revision Date: 01.01.2024

**6. Prevention of Conflicts of Interest**

We avoid situations where personal interests conflict with the interests of the company. Employees must disclose any potential conflicts of interest to the appropriate authority.

**7. Prevention of Unfair Trade Practices**

We compete fairly and ethically in the market. We do not engage in practices that harm competitors, customers, or suppliers unfairly.

**8. Prevention of Counterfeit Parts**

We ensure that all products and components are genuine and of high quality.

**9. Compliance with Export Restrictions**

We comply with all export laws and regulations in the countries where we operate and do not engage in activities that violate export restrictions.

**10. Information Protection**

We protect the confidentiality, integrity, and availability of all company information. We comply with data protection laws and regulations.

**11. Responsible Purchase of Materials**




We source materials responsibly, considering their environmental and social impacts and prioritize suppliers who adhere to ethical and sustainable practices.

**12. Labor and Human Rights of Workers**

We respect the rights of all workers, including their right to fair wages, safe working conditions, and freedom of association. We do not tolerate any form of discrimination, harassment, or forced labor.

**13. Environmental Protection**

We are committed to minimizing our environmental impact and promoting sustainable practices.

			12
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	

We comply with environmental laws and regulations and strive to continuously improve our environmental performance.

<b>SIPL</b>	<b>HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS</b>	Document No: Annexure 06 Revision No: 02
	<b>Code of Ethics and Business Conduct</b>	Revision Date: 01.01.2024

### Conclusion

This Code of Ethics and Business Conduct reflects our commitment to conducting business ethically, responsibly, and in compliance with applicable laws and regulations. All employees are expected to uphold these principles in their daily activities.

### Disciplinary actions

The company will take disciplinary action against employees who repeatedly or intentionally fail to follow this code of conduct. Disciplinary actions will vary depending on the violation.




Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement, or other unlawful behavior.

### 12. Monitoring & Measurements - KPI

Description	Measurable	Frequency
Code of Ethics and work	No. of incidents reported for not following the company code of conduct.	Monthly
Authorized use of company trademarks, copyright.	No. of cases reported for wrong use of company trademarks, copyright.	Monthly
Integrity	No. of cases for not respecting the integrity.	Monthly
Company Gift policy	No. of Cases reported for accepting gifts from clients or partners.	Monthly
Abuse of authority	No. of incidents reported for abusing their authority for the customers, stakeholders etc.	Monthly
Conflict of interest	No. of incidents reported for conflicts of interest.	Monthly
Counterfeit parts	No. of incidents of counterfeit parts being found in the market	Monthly
Export in restricted territory	No. of times violation of export in restricted territory	Monthly

			13
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	