

Code of Conduct

Sooty Enterprises Private Limited (“SEL”)’s mission is to conduct the business efficiency with good corporate governance though being a responsible citizen to protect environment and improve quality of life of the communities to ensuring the company long-term sustainability growth. For that reason, SEL is committed to ensuring that the working conditions in SEL’s supply chain are safe, people are treated equally with respect and dignity, and the operating processes are environmentally sustainable.

“SEL Supplier Sustainable Code of Conduct” has been formulated from internationally recognized standards and buyers’ COC in order to advance social and environmental responsibility. Therefore, SEL’s suppliers are obligated, in all of their activities, to operate in full compliance with the laws and regulations of the countries in which they operate & conserve while upholding the SEL policies concerning compliance with all applicable laws, Business Ethics, Human Rights, Health and Safety and Environment as indicated in each subsection of this code.

1 Scope

As a minimum, SEL ensures and expects our suppliers and contractors to maintain a strong commitment to adhere Sooty code of conduct.

2 Legal Compliance

- **Complying with all applicable national and/or local laws and regulations**, including but not limited to labor, immigration, occupational health and safety and the environment.
- **Maintaining all the necessary licenses and permits** to operate in compliance with international, national and local laws and regulations applicable to its business operations, national and local laws and regulations applicable to its business operations.
- **Notifying SEL** upon receiving notification of any regulatory inspection or legal action relating to suppliers or contractors’ business activities with SEL.

3 Labor

3.1 Human Rights

- **Freedom of Labour**, by not engaging or employing people, under any circumstances, against their own free will.
- **Freedom of Association**, by respecting the legal right of employees to become members of a labor union or otherwise.
- **Prevention of Child Labour**, by not employing children below the legal minimum age requirement of the country. If the local law does not establish a minimum age, employees must be at least sixteen (16) years of age. Employees must be at least eighteen (18) years of age to perform night work or hazardous work, except where permitted by local laws.
- **Wages and Benefits**, by complying with all applicable laws related to employee compensation, including those related to minimum wage, overtime hours and legally mandated benefits.
- **Working Hours**, by complying with local laws or agreements regarding working hours, overtime hours, and work during holidays and work during holidays.

- **Workplace Harassment:** Soorty ensure the protection and the right of its stakeholders. They are intended to give members and employees clear procedural guidelines in identifying and reporting abuse & harassment.
- **Non-Discrimination,** by respecting diversity in the workplace and not engaging in any form of discrimination based on sexual orientation, race, color, religion, age, marital status, pregnancy, political affiliation, or disability in hiring and employment practices.
- **Layoff practices** that are managed in accordance with Labour laws. Suppliers and contractors must not unfairly terminate any employment contract without valid reasons, which must legally be related to an employee's work performance.
- **Humane Treatment,** by respecting workers' rights and ensuring no harsh and inhumane treatment, including any form of mental or physical coercion, or verbal abuse of workers.
- **Foreign or Migrant Workers,** where if foreign or migrant workers are engaged, they are to be employed in full compliance with the labor and immigration laws of the host country. Prior to hiring, the basic terms of employment must be provided to workers in their native language or a language in which they understand. Passports and other forms of personal identification must remain in the worker's possession at all times and are never to be withheld by suppliers, facilities or any third party. Employed in full compliance with the labor and immigration laws of the host country. Prior to hiring, the basic terms of employment must be provided to workers in their native language or a language in which they understand. Passports and other forms of personal identification must remain in the worker's possession at all times and are never to be withheld by suppliers, facilities or any third party.
- **Establishing grievance mechanisms** that provide a means of anonymous grievance reporting and appropriate follow-up measures while protecting the confidentiality of the complainant, appropriate follow-up measures while protecting the confidentiality of the complainant.
- **Promoting positive labor relations** between employers and employees from the beginning to end of employment, including the process of contract signing, work assignments, employee management, probation period, opportunities for development, a good work environment, talent attraction and retention, probation period, opportunities for development, a good work environment, talent attraction and retention, pay raises, welfare and benefits, transfers, and end of employment.

4 Social Responsibility

- **Managing impacts on health, safety, and community security** throughout the entire project cycle, from project planning to execution, production, logistics, decommission and demolition, and decommissioning.
- **Respecting** surrounding communities and contributing positive benefits to societies in which they operate.
- **Participating** where possible, in voluntary, industrial, governmental or community-based corporate responsibility initiatives.

5 Health & Safety

- **Working Environment** must be a safe and hygienic place to work, with sufficient light, heating, and ventilation. Suppliers must provide access to clean toilet facilities, to potable water, and, if applicable, to sanitary facilities for food preparation and storage. Where provided, dormitories must be clean, safe, and meet the basic needs of workers.
- **Building Safety;** Suppliers must ensure that the structure of the production unit, including dormitory facilities provided by the production unit, is stable and safe, does not exceed the approved loading, and does not put people in jeopardy. Suppliers must conduct building inspections on a regular basis as per country law or industry practice. Building must be approved only for industrial use and it must be under single occupancy/ownership. Suppliers must align the building structure and use (all areas of the buildings including the rooftop) with the approved building plan, with no additional floors or external retrofit structures. Suppliers must ensure that a valid fire license is available, covering the entire building.
- **Fire Safety & Emergency Response** Suppliers must take precautions to prevent accidents and injury to health from occurring in the course of work, by ensuring safe handling and storage of chemicals, the safety

of machinery and equipment, electrical safety, the safety, strength and stability of buildings, including residential facilities where provided, and by providing adequate safeguards against fire. Suppliers must provide workers with regular health & safety training, including fire safety training, training in waste management and handling of chemicals and other dangerous materials.

6 Environmental Management & Sustainability

- SEL takes pride to prioritize business and formulate its value chain with Suppliers and Vendors who takes sustainable initiatives to reduce their Eco-footprints by reducing carbon-footprints from their system, conserve natural resources, encourage reduction of waste through 3R concept and eliminate, substitute or minimize the adverse environmental impacts and health & safety risks that may be associated with our products or employees.
- **Comply with environmental laws, regulations and standards;** obtaining and maintaining permits, conducting regular audits, sampling and monitoring of relevant parameters are within their applicable legal limits such as air emissions, noise, wastewater discharge, soil and groundwater quality and ecosystem preservation
- **Reducing environmental impacts** from production, services and logistics throughout the entire operational cycle, by adhering to pollution prevention principles that include minimizing generation of waste, waste water, air emission, including efficient resource use while implementing the 3R concept.
- **Implementation & monitoring** of environmental performance, such as greenhouse gas accounting, raw material and energy consumption, waste generation, waste water discharges, and air emissions.
- **Reducing climate change impacts** from greenhouse gases emissions through most advanced technology available.
- **Preventing accidental releases** of hazardous materials into the environment and creating adverse impacts on surrounding communities. Reducing and eliminating the use of restricted, toxic and hazardous constituents/substances in products and services
- **Promoting greater environmental responsibility** and collaborating with value chain on the development of SEL Group's green products and services, and conducting business with environmental as well as social benefits to ensure the long-term sustainability of business of the company.
- **Chemical Management** Supplier must identify which chemicals are used in the factory and whether these could have a less harmful substitute. For harmful chemicals which cannot be substituted, supplier need to follow regional laws regarding obtaining permissions to purchase, store and use them. Ensure weather proofing safe handling of chemicals and have the procedure in place for how to mix, transport and use the chemicals. Supplier must keep strict control over these procedures in order to avoid fires, spillages and other accidents from happening.

7 Anti-Corruption

SEL expects suppliers to adhere to high ethical standards in business practices by not tolerating, permitting, or engaging in bribery, corruption, or unethical practices whether in dealings with public officials or individuals in the private sector. Suppliers and contractors must not offer, pay, solicit or accept bribes, including facilitation payments. Suppliers must have an anti-corruption policy and procedures in place, and review them regularly to ensure that they are operating effective.

Asad Soorty
(Director)