



SUPPLIER CODE OF CONDUCT POLICY

Version Number	Creation/ Revision Date	Prepared /Updated By	Reviewed By	Approved By	Change Description
1.0	01.06.2021	Compliance & Risk Committee	RiskPro	Group CEO	No Changes.
1.2	18.05.2022	Compliance & Risk Committee			Added policy review frequency

TECHNO BRAIN SUPPLIER CODE OF CONDUCT POLICY

1 INTRODUCTION

This document sets out the Supplier Code of Conduct Policy (“Policy”) of Techno Brain group of companies (“Group”).

The Group is committed to the conduct of its business in consideration of business ethics, respect for fundamental worker rights as well as in consideration of environmental standards and regulation.

This Policy provides the guidelines on Supplier code of conduct with a view to educate the Suppliers (defined below) on conducting business with the Group ethically. This Policy provides fundamental expectations of its suppliers regarding their activities in the production and delivery of good and services supplied directly to the Group. In addition, the policy supports the Group’s values, purpose and strategy as well as internationally recognized standards and appropriate codes of practice. By accepting and abiding by this policy, suppliers affirm that they are committed to working with The Group and are aligned to its values, purpose and strategy.

The Suppliers are to adhere to this Policy while dealing with any person within the Group or when providing a product or service to the Group.

The Group wants to ensure that its Suppliers clearly understand and have the ability to properly address the supplier code of conduct compliance risks associated with doing business globally. All Suppliers are expected to read this Policy and ensure compliance of the same. In case any Supplier requires any clarification on any aspect of the Policy, they may contact the Group through an email provided in this policy.

2 Scope

This guideline applies to suppliers of goods and services to the Group, including local, national or international.

3 Definitions

In this Supplier Code of Conduct, unless the context otherwise indicates:

Suppliers means organizations/companies who have contractual relationships with the Group; including Contractors, Suppliers of goods and services and Joint Venture partners.

4 People

4.1 Human Rights

The Group is committed to creating and supporting a culture and work environment in which people have opportunities to do their best in their work.

- Suppliers must comply with all relevant local and national laws and regulations with regard to employment practices, benefits, health and safety and anti-discrimination.
- Suppliers will commit to provide a workplace free of any form of harassment
- Suppliers shall not use any of forced, bonded, indentured or prison labour. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice.

- Suppliers must strive to support the principles in the UN Global Compact.

4.2 Diversity

The Group is committed in encouraging diversity in the work place and provision of a work environment that is free from all forms of discrimination and promotes equity to all.

- Suppliers are to promote an inclusive workplace where employees' differences in areas like gender, sexual preference, age, culture, disability, religion, race, colour, political, nationality, ethnic or social origin and lifestyle choice are valued
- Suppliers must strive to provide a workplace that is fair, equitable and safe workplace, which is free from harassment, discrimination or bullying.

4.3 Learning & Development

The group is committed to supporting career development of its employees through continuous learning, by providing opportunities to develop skills and competencies as well as experiences, that not only meet the current needs of employment but also to provide capability to achieve career goals.

- Suppliers must be committed to providing relevant training, learning and development opportunities for all employees.

4.4 Workplace Health and Safety

The Group is committed to provide and continuously promote the health, safety and well-being of its employees, contractors and visitors by providing a conducive work environment that is free from any work induced or work aggravated hazards.

- Suppliers must support and demonstrate their commitment to;
- Prevent worker exposure to potential health and safety hazards
- Comply with all relevant local and national laws and regulations with regards to Occupational Health and Safety
- Have written safety and health policies and standards
- Have a documented system to record and address/reduce work related hazards facing their operations.

5.0 Environment

Suppliers are to manage the minimization of their environmental impact in the course of doing business, and to support and encourage others where in can be meaningfully do so.

All required environmental permits and registrations are to be obtained, maintained and kept current.

5.1 Climate Change and Energy

The Group aspires to identify and respond to climate change risks and opportunities in managing our business portfolio and work towards carbon neutrality in our operations, development and business activities.

- Suppliers will commit to reduce their carbon emissions in areas within their control and to imbed a preference for carbon neutral products and services in their purchasing process.

5.2 Waste & Resource Management

The group aspires to utilize resources optimally for maximum lifecycle and secure disposal of waste without causing any environmental harm and risks to human health.

Waste

- Suppliers will commit to secure and proper disposal of materials with an aim of not causing environmental harm, minimizing waste to landfill and not causing human health risks.

Resource

- Suppliers will commit to utilize resources optimally to maximum lifecycle, and to only use what is needed.

5.3 Biodiversity

The Group aspires to positively contribute to sustainable and resilient communities and ecosystems through the protection of biodiversity.

- Wherever possible, Suppliers will make a positive contribution on biodiversity, in relation to the products and services they provide.

5.4 Water

The Group aspires to adopt best practices that promote sustainability and proper management of water resources.

- Suppliers will commit to sustainable use and proper management of water resources in all areas that they have control over, as well as to support and encourage others where they can meaningfully do so.

6.0 Community

6.1 Community Engagement & Development

The Group aims to make a positive contribution to our communities, people and environment.

- The supplier will commit to contribute to the communities which the Supplier impacts, as well as support their sustainable development.

7.0 Corporate Governance, Business Conduct and Ethics

The Group regards good corporate governance as being of critical importance to all of Group Stakeholders and a fundamental component to the Group's commitment to security holders. The Group 's Board strives to ensure that The Group meets high standards of governance across its operations and conducts its business with high standards of ethical behavior that is in accordance with the laws and regulations.

- Suppliers must strictly comply with all laws and regulations on bribery, corruption and prohibited trade and business practices.
- Suppliers must conduct their business in accordance with high ethical standards
- Suppliers must have effective and transparent allocation of responsibilities between the Board and management.
- Suppliers must have effective processes in place to prevent or immediately disclose a conflict of interest or the appearance of a conflict of interest related to its relationship with the Group as soon as possible to the Group.

8.0 Supply Chain

The group is committed to working in partnership with our suppliers to realize the full value of our relations and to positively contribute to our stakeholder communities and the environment.

- Suppliers must adopt similar principles outlined in this Code of Conduct to promote compliance among their own suppliers
- Suppliers must adhere to acceptance business practices with their own suppliers, including timely payment

9.0 Breach of Policy and Report of Concern

All Suppliers must abide by this Policy at all times and to avoid any activity which may lead to breach of this Policy. In this regard, if any Supplier that has any doubts or concerns as regards the Policy they may use the below contact

Email Contact: tbgethics@technobraingroup.com

Everyone to whom this Policy applies to, is free to report suspected acts of violation of this policy to the email as provided above. Suppliers are encouraged to raise genuine concerns under this Policy.

Any breach of this Policy by a Supplier will be considered as breach of contract with the supplier which may lead to the termination of the commercial contract. The aforesaid is in addition to consequences under applicable local laws. Breach of certain provisions under this Policy may also result in breach of certain legal provisions of the applicable laws. The consequences of breach of legal provisions vary from jurisdiction to jurisdiction and may at times lead to imprisonment and hefty fines.

Suppliers are assured that complete confidentiality shall be maintained as regards their communication with the above email ID.

10.0 Due Diligence and Selection of a Supplier

As part of its business, the Group liaises with Other Third Parties from time to time. The Group shall be performing a due diligence to any of its suppliers and their sub-contractors to confirm the requirements set out in this Code of Conduct are in place and in force.

The Group shall ensure the following while dealing with Suppliers:

- Undertake the Group's requirements of investigating (which includes conducting appropriate due diligence), pre-qualifying and internally certifying the Supplier. This process needs to be documented suitably.
- After approving any Supplier, a written agreement should be signed with the Supplier detailing the terms of the engagement.
- Each Supplier who is engaged by the Group should adequately be briefed about this Policy and also about the requirement of them adhering to this Policy.
- Each Supplier shall contain suitable wordings making it possible for the Group to terminate the agreement if the Supplier fails to abide by this Policy.
- All payments to the Supplier must be made to them directly. Payment must not be made to the Supplier through another party that has no contractual relationship with the Group.

11.0 Training / Awareness

The Group may create awareness of this policy to its Employees/ Group Representatives/ Suppliers for a better understanding of the policy.

12.0 Applicable Legislations

All local laws and regulations of the jurisdictions in which the Group operates are applicable to the Group, its Employees and Suppliers. These laws are in addition to this Policy and are to be complied with by the Group employees and the Suppliers to the fullest extent.

13.0 Policy Review

This policy shall be reviewed once every two years or when business needs arise.

