



## Supplier Code Of Conduct

<b>Company Name:</b>	Uni Tritech Private Limited
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## **Introduction**

We take social and environmental factors into consideration alongside financial factors and customer specified requirements in making decisions on the purchase of Products, materials and services. Our purchasing decisions should where practicable consider whole life cost and the associated risks and implications for society and the environment.

Procurement can make a significant contribution to our goals of sustainable economic development and resource minimisation by ensuring that the products and services we procure considers optimum environmental performance.

Procurement has an additional role to play in minimising any risk of social exploitation within the supply chain. We believe that this not only makes business sense, it also has the potential to improve the living and working standards of people around the world. We would not knowingly purchase from a supply chain where the source of the product or service came from companies / agents who exploit the workforce / employ child labour / or employ dangerous business practices. This is why where possible we procure direct from known sources, whom we have dealt with personally and have built a good understanding, or where we can accurately determine the source of product and materials and where and how they were produced.

This policy standard sets out the requirements and minimum expectations of our policy of sustainable and ethical procurement. Specifically, it addresses the expectation that our staff and suppliers have a natural respect for our ethical standards in the context of their own particular culture and that relationships with our suppliers are based on the principle of fair and honest dealings at all times.

The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

## **Applicability, Scope and Acceptance**

This Supplier Code of Conduct (“Code”) applies to all suppliers, contractors, service providers and other third parties providing goods or services to the Company in connection with its business. Suppliers selected and managed by the Company are expected to comply with the requirements of this Code and ensure that relevant requirements are communicated to their subcontractors and sub-tier suppliers.

In cases where suppliers are customer-approved or customer-directed, and supplier selection is mandated by the customer, the Company recognises that it may have limited influence over supplier selection and oversight. In such cases, the Company shall support applicable customer-led legal, environmental, social and ethical requirements, to the extent of its influence.

All suppliers are required to acknowledge acceptance of this Code and demonstrate compliance upon request, in line with contractual arrangements and degree of influence.

## **Objectives**

### **Sustainable Procurement**

Our sustainability objective is to ensure a continuous improvement in procurement decisions measured against delivering sustainable and ethical trading. More specifically, we seek to avoid adverse social and environmental impact in the supply-chain, the reduction of environmental impact from the purchase of products/materials that meet recognised environmental standards.

### **Ethical Procurement**

Our ethical objective is to ensure that people in the supply-chain that we deal with directly and can influence are treated with respect and have rights with regard to employment including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with national laws, equal opportunities, recognised employment relationship, freedom from intimidation and to a safe and healthy working environment.

## **Our Commitment**

Sustainable Procurement Standard Working in partnership

We will seek out suppliers that share our commitment to sound environmental performance and improvement. Where applicable, we will offer assistance to our suppliers in raising their environmental awareness. We will develop partnerships with our suppliers and work together to minimise the environmental and social impacts of our supply chain.

Sustainability requirements will be considered and where appropriate will be specified agreements / contracts and orders for suppliers, to ensure suppliers are aware of our environmental and social criteria at an early stage in the tender process.

## **Environmental impact**

Where practicable, we will purchase products and materials that have a minimal impact upon the environment, (e.g. use of local sources where possible).

Wherever possible we will consume and purchase less by identifying and eradicating, wasteful practices within our own operation and those operations where we have influence.

We will re-use / re-cycle goods such as packaging, where this is possible and where it is not possible ensure disposal in the most environmentally sound manner.

Where possible we will purchase products and services from sound environmental sources.

## **Procurement process**

Compliance with this Supplier Code of Conduct is a mandatory requirement for doing business with the Company. The requirements of this Code may be incorporated into supplier contracts, purchase orders and/or other legally binding agreements either directly or through reference to this Code. Non-

compliance with this Code may require corrective actions and may result in suspension or termination of the supplier relationship, as applicable.

We will use our own purchasing power and also encourage customers by providing a choice in supply options, where practicable, to influence and encourage suppliers in order to create a more reliable market for environmentally and ethically produced products and services. .

We will encourage our suppliers to add sustainability into the procurement cycle: identifying needs; appraising options; looking at different product / material variations and supplier development.

## **Supplier Sustainability Due Diligence (Risk-Based Approach)**

The Company adopts a risk-based approach to supplier sustainability due diligence. Suppliers may be evaluated and categorized based on sustainability risk factors such as geographic/country risk, nature of goods and services supplied, supplier criticality, and potential environmental and social impacts. Based on the risk category, suppliers may be subject to sustainability assessments, enhanced monitoring and/or audits, as required.

## **Ethical Procurement Standard**

We expect our suppliers to comply with legal requirements and to adopt the following moral principles:

## **Regulatory compliance**

Suppliers shall comply with all national and other applicable law and regulations, including International trade compliance, Suppliers *must be aware and comply with all applicable laws and regulations governing*

*(a) the export, re-export and retransfer of goods, technical data and software and services; (b) import of goods; (c) economic sanctions and embargos; (d) US antiboycott requirements. In any dealings with other countries, all compliance and regulations should be adhered to in their strictest form, most notably the ITAR regulations set down by the United States of America.*

Tritech Group and its supply chain, is required to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act which requires all U.S. publicly-traded companies to file annual disclosures with the Securities and Exchange Commission (“SEC”) related to the use of so-called “conflict minerals” (tantalum, tin, tungsten, and gold) in their products.

Tritech Group and its supply chain shall be committed to comply with this directive, the aim of which is to stop violent conflict in the Democratic Republic of Congo (DRC) and surrounding countries. Although reporting requirements only apply to publicly-traded companies required to report to the SEC, information needed to comply with these requirements must be obtained from the entire supply chain, encompassing both U.S. and non-U.S. suppliers.

Suppliers shall comply with REACH (Registration, Evaluation Authorisation and restriction of Chemicals; EC 1907/2006) European regulation applies to Tritech Group and our supply chain, e.g, all Tritech Group sites and Suppliers need to comply with the regulations and laws applicable within their operating countries and markets.

Where the national law and this Standard are in conflict, the highest standards consistent with national law should be applied. Where the provisions of law and this Standard are not in conflict but address

the same subject, the provision, which affords the greatest protection to people and the environment, should be applied.

## **Combating Fraud and Money Laundering**

The Supplier and all of its employees shall be committed to fair legal trade and as such, any transaction that appears suspicious or unusual may be reported to the relevant authorities.

## **Whistle Blowing**

The supplier shall be committed to lawful trade and non-discriminatory behaviour. Should any conflict to this goal be witnessed by any employee they have the freedom to report any such behaviour to any relevant internal or external parties without fear of reprisal or recrimination, provided it is done without malice or harmful intent.

Suppliers, their employees and other relevant stakeholders are encouraged to report any suspected misconduct, unethical behaviour or violations of this Code through the Company's grievance/whistleblowing mechanism. The Company does not tolerate retaliation against any individual who raises a concern in good faith. All reports shall be handled in a confidential manner, to the extent permitted by applicable law.

### **Employment**

There is no forced, bonded or involuntary prison labour.

All employees without distinction, have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively.

Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

## **Elimination of child labour**

The long-term elimination of child labour should take place in a manner consistent with the best interests of the children concerned.

Suppliers should develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

Children and young persons under 18 shall not be employed at night or in hazardous conditions.

## **Right to a living wage**

Wages paid for a standard working week meet or exceed national (or, where applicable, local) legal standards.

In any event, wages should not be paid in kind and should be enough to meet basic needs.

All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure should not be permitted. Deductions from wages

not provided for by national law should only be permitted with the expressed permission (without duress) of the worker concerned. All disciplinary measures should be recorded.

## **Avoidance of excessive working hours**

Standard working hours must comply with national laws and national benchmark industry standards; whichever affords greater protection to the employee.

All Employees should not on a regular basis be required to work in excess of 48 hours per week and should be provided with at least one day off for every 7-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

## **No discrimination**

A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

## **Provision of regular employment**

To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should not be avoided.

Examples include the abuse of labour-only contracting, sub-contracting, or home-working arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or the excessive use of fixed-term contracts of employment.

## **No harsh or inhumane treatment**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse of other forms of intimidation shall be prohibited.

## **Anonymous Reporting and Misconduct Reporting**

It is a requirement for our suppliers for you to provide your employees and your business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this code by you or your business partners without fear of retaliation, including opportunities for anonymous reporting.

In the event you become aware of misconduct related to Tritech Group Business by any of your employees or any of your business partner employees we expect you to notify Tritech Group immediately to your business contact or directly to Tritech Group head office.

## **Safe and Healthy Working Conditions**

We expect our suppliers:

To provide a safe and healthy working environment bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards.

To take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working practice and environment.

Provide workers with suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise the risks.

Provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.

To assign responsibility for health and safety to a senior management representative.

## **Environment**

**We expect our suppliers:**

To have an effective environmental policy, to implement the policy at all levels throughout the company and to include a commitment to continual improvement in environmental performance and prevention of pollution.

To comply with all environmental legislation, regulations and all local laws which relate to the organisations environmental aspects to facilitate the protection of the environment.

To have a process that ensures conformity to local regulations, including those relating to the reduction, reuse and recycling of waste and the elimination and safe disposal of dangerous materials.

To identify a person within its business who has responsibility for environmental compliance issues and to be able to demonstrate that responsible personnel are adequately trained in environmental matters.

To routinely identify risks of adverse environmental impact associated with their operations and where operations with identified risks are planned to ensure they are carried out under controlled conditions with the objective of minimising potential adverse impact upon the environment.

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## **Social**

**We expect our suppliers:**

The Company expects suppliers to comply with all applicable labour, human rights and occupational health & safety laws and regulations. Suppliers are expected to provide safe and healthy working conditions for all workers and implement appropriate controls to prevent occupational injuries and illnesses. Suppliers shall not employ child labour, forced labour or bonded labour and shall ensure fair wages and working hours in line with legal requirements. Suppliers are also expected to promote non-discrimination and equal opportunity and treat all workers with dignity and respect, with no tolerance for harassment, abuse or inhumane treatment.

# Quality Flow Down Compliance

## We expect our suppliers:

To implement a quality management system. (Eg ISO 9001, AS9100 or AS9120)

Suppliers that utilise Special Processes shall have Nadcap accreditation or have a specific customer approval.

Suppliers that could affect product quality shall have counterfeit part and obsolescence policies /procedures.

Supplier that could affect product quality shall have a FOD awareness program/procedure.

Suppliers shall not sub contract any work without notification and approval from Tritech.

Retain documented information in line with retention periods and customer specific requirements.

Ensure all staff are aware of the importance of the contribution given to the product and service conformity.

Suppliers shall train / inform staff of any product safety requirements in relation to our products, Vital parts etc (this shall be noted throughout the routing process)

## Principles

We will use the following best practice principles to guide the implementation of our policy:

### Principle 1: Working together

We will:

work collaboratively with suppliers in pursuit of this standard;

guide relationships by the principle of continual improvement;

welcome rather than penalise suppliers identifying activities that fall below this standard and who agree to pursue their aspirations;

### Principle 2: Making a difference

We will, and we expect our suppliers to:

use an environmental, sustainable and social risk-based approach to the supply of products and services;

focus attention on those parts of their operation supply chain where the risk of not meeting ethical and sustainable norms is highest and where the maximum difference can be made with resources available.

### Principle 3: Awareness raising and training

We will, and we expect our suppliers to:

Ensure that all relevant people are provided with appropriate training and related to ethical and sustainable issues in the supply chain.

### Principle 4: Monitoring and independent verification

We will:

Recognise that implementation of this standard may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.

We will expect our suppliers to:

provide reasonable access to all relevant information, premises, and workers and co-operate in any assessment by ourselves or independent verifiers.

Suppliers may be required to complete a sustainability self-assessment questionnaire and provide supporting documents (where applicable) related to legal compliance, environmental practices, labour practices, occupational health & safety management, and business ethics. Suppliers shall provide accurate and complete information and shall inform the Company in a timely manner of any significant incidents, legal non-compliance, or violations relevant to this Code.

### **Principle 5: Continuous improvement**

We will, and we expect our suppliers to:  
apply a continual improvement approach in ethical, sustainable, environmental and health and safety and quality issues and develop improvement plans as required;

Ultimately, Trittech will not do business with a supplier where serious breaches are identified by ourselves or independent bodies and where the supplier consistently fails to take corrective action within an agreed timescale.

The Company encourages suppliers to continuously improve their sustainability performance. Where feasible, the Company may support supplier capability development through guidance, awareness sessions, sharing of best practices and/or improvement plans, particularly for suppliers identified as high-risk or high-impact.

### **Supplier Audits and Corrective Actions**

The Company may assess supplier compliance with this Code through sustainability assessments and audits (remote and/or on-site), where applicable. Suppliers are expected to cooperate with such assessments/audits and provide access to relevant records, documentation and facilities, to the extent legally permissible. Where gaps or non-conformities are identified, suppliers shall develop and implement corrective and preventive actions within agreed timelines and provide evidence of completion upon request.

### **Responsibility and Authority**

This policy standard is issued under the authority of the Directors of Trittech Group. Responsibility for implementation of this policy standard is set out below.

Responsibility for the achievement of this policy standard rests with the Directors

Directors are responsible for implementing the policy standard, monitoring its implementation and reporting to the board