



SUPPLIER CODE OF CONDUCT

UNIVERSAL PRECISION SCREWS

NH-10, KHARAWAR BYE-PASS, DELHI-ROHTAK ROAD, ROHTAK, HARYANA (IN) - 124001

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1) Introduction

This Code of Conduct reflects values of the company* and its Suppliers.

The Supplier Code of Conduct is to ensure that values of company are being followed by the suppliers and all their personnel including but not limited to employees, officers, and directors. The matters covered in the Code are important for the company and its Suppliers, for their business conduct.

All personnel of suppliers shall observe and implement the code of conduct in their official day to day activities.

Last page of this code of conduct is "[Declaration](#)", share the signed copy as acceptance of this code of conduct.

2) Ethical Conduct

All personnel of the supplier shall deal on behalf of their company with professionalism, honesty, and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

3) Regulatory Compliance

All personnel of the supplier shall, in his or her business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which he or she operates.

4) Accounting and Reporting

All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

5) Money Laundering

The supplier shall not accept, facilitate, or support money laundering.

6) Bribery, Corruption, Extortion and Embezzlement

The supplier shall not offer or provide an undue monetary or other advantage to any person or persons, including public officials, customers or employees or consultants or any other third party dealing with company, in violation of laws and the officials' legal duties in order to obtain or retain business.

7) Marketing and Sales

The supplier shall not make false statements or provide misleading information regarding its products or their performance, including the safety and environmental attributes of the products.

* Universal Precision Screws (UPS) and Universal Precision Screws Private Limited (UPPL)

8) Fair Competition Practices

Supplier shall compete with other suppliers in a fair manner and with integrity. Supplier shall not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that improperly influences the marketplace or outcome of a bidding/negotiation process.

9) Conflict of Interest

The duty of all personnel of supplier towards the company demands that he or she avoids and discloses actual and potential conflicts of interest. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the company.

If a supplier is considering investing in any customer, supplier, developer, or competitor of the company, he or she must first take care to ensure that these investments do not compromise on their responsibilities towards company. The company's policy requires that information to be given while making such an investment.

Notwithstanding that conflict of interest exist due to any historical reasons, adequate and full disclosure by the supplier should be made to the company's management.

10) Protecting company's Assets

The assets of the company shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, and resources as well as intangible assets such as Intellectual Property Rights, Knowhow & Technology, proprietary information, relationships with customers and suppliers, etc.

The supplier must maintain physical and electronic security for all confidential information. Supplier's employees should use extreme care in protecting confidential or proprietary information of any kind. Face-face discussions should be conducted in a secure location.

If confidential information to be discussed or exchanged between company and the supplier, or the supplier and a Third Party, the parties must first ensure that a confidentiality or Non-Disclosure Agreement has been signed and is being complied with.

11) Privacy, Data Protection and Disclosure of Information

Suppliers shall protect the privacy & confidentiality of personal information of everyone with whom they do business, including suppliers, customers, consumers, and workers.

12) Protecting Environment

The supplier must comply with all applicable requirements of environmental / pollution control* laws and regulations, sustainable resources management and waste reduction and responsible chemical management.

* GHG emissions, energy efficiency and renewable energy, water quality and consumption and air quality.

13) Providing Safe and Healthy Environment

The supplier shall strive to provide a safe and healthy working environment and comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical, and structural safety.

The supplier should have strict procedures that prevents the use of illegal drugs or alcohol in the factory and that prevent impaired employees from working. The supplier must inform any reportable accident(s) to company immediately with corrective action to be taken to avoid such accident(s) in future.

14) No Child or Forced, bonded, exploitative prisoner, indentured, trafficked or slave labour

The supplier shall not hire any child. Also, supplier must not use involuntary labour of any kind, including debt bondage, forced labour, bonded, exploitative prison, indentured, trafficked or slave labour. Additional standards include the following:

- A supplier must comply with all applicable child & young labour laws, including those related to hiring, wages, hours worked, overtime and working condition. Vocational or developmental programs for young people require an exception to the age requirements.
- The supplier must maintain official documentation that verifies a worker's date of birth, employment, and training history. company reserves the right to review this information whenever required.

15) Equal-Opportunities Employer

The supplier shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Employees of the Supplier shall be treated with dignity and in accordance with maintaining a work environment free of sexual harassment, whether physical, verbal, or psychological.

16) Wages and Hours

The supplier must follow all applicable laws regarding working hours, wages and overtime pay. Workers must be paid at least the minimum legal wage or a wage that meets local industry standards. The supplier must pay overtime and any incentive rates that meet all legal requirements or the local industry standard. Workers should receive necessary time off, paid annual leaves and holidays as required by local laws.

17) Harassment and Non-Discrimination

The Supplier must provide a work environment that is open, mutually supportive, and free of inappropriate behaviour of all kinds and harassment on account of physical contact, a demand or request for sexual favors, making Sexually colored remarks, showing pornography or other offensive or derogatory pictures,

cartoons, representations, graphics, pamphlets, or sayings, violence or gender-based violence, mental or physical coercion, corporal punishment, sexual abuse, bullying, public shaming, verbal abuse, any other unwelcome physical, verbal or non-verbal conduct of sexual nature physical, verbal, or psychological.

18) Gifts and Donation

The supplier shall not (directly or indirectly) offer any gift, entertainment, trip, discount, service, or other benefit from his organization to any official of company which would or reasonably appear to be capable of influencing such person to act in a manner which is against the interest of the company.

19) Compliance to company provided Drawings and Control Plan

Company expects its suppliers to comply with the drawings and control plans (Specifications, Material Grade, Chemical, Mechanical and Metallurgical properties). Any deviations without information will not be accepted. Debit will be enforced on supplier if any rejection occurs due to supplier problem. Supplier is liable, if any warranty issue or recall of final product is caused due to supplier issue/ problem.

20) Right to Conduct Audit

Company reserves the right to conduct a full audit if necessary to ensure compliance of Supplier Code of Conduct.

21) Grievance, Whistleblowing, and protection against retaliation

Suppliers are expected to permit workers to openly communicate and share grievances with management about working conditions without any fear like reprisal or harassment, and protection of employee and whistle-blowers are to be maintained by supplier. Supplier shall follow the Grievance policy available on www.upsind.com.

22) Freedom of Association and Collective Bargaining

The right of employees to freedom of association and collective bargaining shall be recognized and respected.

23) Responsible Sourcing of Minerals

We seek to ensure that our sourcing practices safeguard human rights. Our Suppliers must do the same by implementing and maintaining robust systems and processes to ensure that minerals are not unlawfully sourced from areas of conflict. Where our Suppliers supply us with products, components and materials that contain Tin, Tungsten, Tantalum, Gold, and Cobalt, we expect them to have conducted thorough due diligence on the source of those minerals to ensure that they have been sourced under the applicable law and internationally recognized standards. Suppliers should follow the guidance published by the Organization for Economic Co-operation and Development (OECD) on Due Diligence to ensure Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("CAHRAs").

24) External Party's Code of Conduct

We stand committed to complying with all the requirements of the external party's Code of Conduct shared by Universal Precision Screws.

25) Information to company regarding Violation and Correction Action

Company expects its suppliers to comply with the conditions of the Supplier Code of Conduct and maintain a system to monitor compliance.

If company determines that a supplier has violated this code, the supplier must provide information relating to the incident(s) and show within 10 days the action taken to correct the condition. Company may follow up to make sure the condition has been corrected.

Document History

Revision	Date	Amendment	Page No.
00	01-01-2016	Initial Release	All
01	06-08-2022	Reviewed and updated	All
02	02-01-2023	Reviewed and updated	All