

BUSINESS PARTNER CODE OF CONDUCT (COMMITMENT POLICY)

MASTER COPY



Policy No.	Process Owner	Effective Date
SEPL/HR/012	FH - HR	02/05/2019

Purpose	The purpose of BUSINESS PARTNER CODE OF CONDUCT is to share Shaily Engineering Plastics Ltd.'s ideology with External Business Partners on standards of code of business.
Scope	This policy applies to all employees and stakeholders of the company (including but not limited to customers, suppliers, contractors, etc.)

Policy:

Shaily Engineering Plastics Ltd. (Shaily) is committed to support sustainable development across corporate end-to-end supply chain. We want to provide a better quality of life for everyone, now and for generations to come. Our responsibility to meet these commitments requires our organization & employees take responsibility for conducting transparent and ethical businesses maintaining the highest standards of legal and ethical conduct; we expect the same from our suppliers. SHAILY expects every supplier to read, understand and agree the Code and its application to the performance of their supplier responsibilities.

SHAILY's BUSINESS PARTNER CODE OF CONDUCT states that:

Principle of Legality - There shall be compliance with all applicable laws and regulations of the country where operations are undertaken.

Honesty and Fairness - Business will be conducted with integrity. There will be no payments, services, gifts, entertainment or other advantages offered or given to any Shaily employee or third party which are intended to influence the way in which Shaily employee, or third party goes about performing his or her duties. Similarly, Shaily will not offer or give such payments, services, gifts, entertainment, brokerage/commission or any other advantages to any supplier which are intended to influence the way in which the supplier goes about performing their duties.

Prohibition of bribery - Shaily shall prohibit bribery in any form. Bribery is offering, promising or giving, as well as demanding or accepting any monetary or other advantage, whether directly or indirectly, in order to obtain, retain or direct business to a particular enterprise or to secure any other improper advantage in the conduct of business. Instances of bribery which are the subject of these principles may involve transactions by, or in relation to, employees, subsidiaries, joint ventures, agents, representatives, consultants, brokers, contractors, suppliers or a third party are strictly prohibited. There will be no actual or attempted money laundering

Trust and Cooperation - It is mandatory for all the Suppliers to make themselves & their employees and also their subcontractor's employees assigned to work on the Shaily account thoroughly aware about this Supplier Commitment Policy & strict adherence to it's principles.

Confidential Information - Suppliers undertake to safeguard and respect Shaily's Intellectual Property and related rights. Suppliers shall ensure to protect confidential information & data which Shaily entrusts with them in the course of routine business for providing products or services.

Prepared By		Approved By		Revision Date
Name:	Kiran Pradhan	Signature	Amit Sanghvi	02-05-2019
Date:	02-05-2019			Revision No.
			02-05-2019	R00

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BUSINESS INTEGRITY CONTROLS LIKE ANTITRUST, EXPORT CONTROLS, SANCTIONS ETC.:

We are committed to fair competition. We comply with the antitrust laws in our interactions with our business partners. We limit the disclosure of personal information and respond to any unintentional disclosure according to the laws of the applicable jurisdictions.

Antitrust regulations aim at preserving fair competition. We do not enter into any prohibited arrangements, and we comply with the applicable rules of fair competition and antitrust regulations.

We adhere to applicable export controls. All employees responsible for the international movement of goods or who may be involved in sharing technology are required to comply with applicable export control provisions. Violations of export control provisions may trigger severe sanctions. Therefore, any employees who deal with the cross-border export or import of goods, services, technologies and cross border payments have to be strictly comply with the applicable export control provisions.

Shaily is dedicated to implement a zero-tolerance approach and will initiate disciplinary actions against any employee or business partner, who has violated antitrust regulations.

SANCTIONS: Suppliers agree & understand that any non-compliance of the above policy will be treated with zero tolerance & can result in heavy penalties, stop payments & legal prosecution against them for breach of trust.

FREE, PRIOR, AND INFORMED CONSENT (FPIC) & NO LAND GRABBING:

The rights and title to property and land of the individual, indigenous people and local communities are respected, protected and promoted. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure. There is zero tolerance of land grabbing.

Shaily follows the definition of FPIC:

- Free - Consent to the sale of land is given voluntarily and absent of "coercion, intimidation or manipulation."
- Prior - Consent is sought sufficiently in advance of any authorization or commencement of activities from an existing land owner.
- Informed - Ensures that information is provided prior to seeking consent to acquire and that information is provided as the acquisition process proceeds.
- Consent - Refers to the collective decision made by the land rights-holders and reached through the customary decision-making processes of the affected peoples or communities

NOTIFICATION OF CODE BREACHES OR MISCONDUCT:

Shaily deals fairly and honestly with all business partners. This means that our relationships with suppliers are based on price, quality, service and reputation. Shaily will carry out due diligence before selection of suppliers. Any act of breach or violation against Shaily's Business Partner code of conduct will be viewed seriously and suitable disciplinary action will be initiated.

Prepared By		Approved By		Revision Date
Name:	Kiran Pradhan	Signature	Amit Sanghvi	02-05-2019
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YOUR VOICE MATTERS:

Shaily believes in open and honest communications, business partners/ Suppliers have a responsibility to report promptly any suspected, potential or actual violation of the Supplier Commitment Policy that could affect the business relationship. The issue should be reported even if anyone believes the issue may have been resolved or if any individual is not sure whether it constitutes a violation. The Customers and suppliers may directly contact the **Directors at sales@shaily.com** on confidential basis without fear of retaliation. Internal staff can report through the mailbox: sales@shaily.com. The contact phone +91-2667-244348 (extension 200)

COMMITMENT:


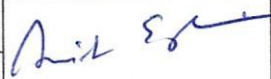
We are jointly committed to perform our duties in compliance with Zero-Tolerance Policy as well as in line with all applicable laws and regulations and we encourage our External Business Partners to commit the same. We are committed to strengthen our relationships with customers, suppliers, and other business associates for conducting our business and pursuing our interests with the highest standards of legal and ethical conduct creating excellent reputation with successful business.

Shaily reserves the right to discontinue any relationship should the external business partner violate, fail to correct, or have a pattern of violating these guidelines.

All Shaily staff and stakeholders have obligation to supervise on the policy.

Revision History:

R00- New Release

	Prepared By		Approved By		Revision Date
	Name:	Signature	Name:	Signature	Revision No.
	Kiran Pradhan		Amit Sanghvi		02-05-2019
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