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## Message from Managing Director

Our success as a business entity has been defined by the culture of commitment and adherence to Organisation values, by all of us including employees, directors and partners.

Guided by our Code of Conduct, we continue to uphold our Organisation Values, build trust and pride while strengthening our business. The Code of Conduct explains our commitments and expectations towards employees and all personnel who are part of our entire supply chain.

We ensure to hire right talent at the right role by having a structured Talent Management and Talent Development Program.

We will continue to not only comply with the laws and regulations that govern our business interests around the world, but will continue to set new standards of ethical conduct that will generate deep respect and inspire emulation by others.

Looking forward to working together with integrity while continuing to build on the strength of our brand!

## About the Company

**Bhatia Alloy** was established in 1996 as a Privately owned company by Er. Ramesh Bhatia and Er. Dheeraj Bhatia, was ventured to manufacture forged machined valves in Brass for High Pressure Applications.

During these years, the Organisation and its members/employees had built and maintained reputation for integrity and technical competence. Today, Bhatia Alloy has a specialized team of professionals & self-motivated workforce who are the most treasured assets of the organisation.

Bhatia Alloy is proud to have long-lasting relationship for over 27 years now, with renowned companies of all industrial sectors. We support our customers with Just-In-Time (JIT) and Direct-On-Line (DOL) capabilities. Not compromising on delivery schedules, every forging receives due attention.

With a capability to forge shapes varying from simple to complex, with a capacity to forge 300 thousand pieces per month varying from smallest of closed die forgings of 50gms to largest of 10 kgs per piece, Bhatia Alloy has the expertise and infrastructure to cater to the most challenging customers' requirements.

## About Our Customers

BAFPL have its business relations with all to notch brands who are leaders in their respective industry/domain. While rendering services to our customers we abide by the best industry standards. In this regard, we expect that to whom so ever this policy applies should also follow the best industry practise and should abide by this policy.

## **Mission and Vision**

### **Mission**

We are driven by our passion to build components using innovative sustainable practices and dedicated towards on-time delivery, dependable quality and prudent pricing.

### **Vision**

Be that vital Cog for the Automotive World, by providing increased safety & comfort, Pre-Emptying the needs of Happy Customers in a Sustainable Way.

### **Values**

- Be THE Symbiotic Partner
- Lead with Empathy
- Be Safe; Be Frugal
- Always go THAT extra mile
- Honour Individual; Respect Team
- Leave IT Better

### **Success Definition**

- When sourcing AI forged parts is no longer a challenge for the customer partner.
- Scalability for the customer partner to have more revenue.
- Premium and Consistent Quality.
- Seamless Integration of Deliveries to help customer partner achieve HIS GOAL.
- Prudent Pricing

### **Purpose**

This code helps to recognize, report and mitigate a potential ethical or legal issue. This code acts as a guide to all employees and various stakeholders on the values, ethics and business principles expected of them in their personal and professional conduct. This Code summarizes the major Policies and Directives of the Company that applies to our operations.

### **Scope**

This Code applies to Bhatia Alloy Forgings Pvt. Ltd (BAFPL) and all of its managed operations. It thereby applies to all regular, part-time, temporary employees, as well as to agency personnel, independent contractors including but not limiting to its suppliers and other personnel who are part of BAFPL's entire supply chain while they are performing services for Bhatia Alloy Forgings Pvt. Ltd (BAFPL).

## Policy

### 1. Business Ethics

#### 1.a Conflict of Interest

It is the policy of BAFPL to conduct its affairs in strict compliance with the letter and spirit of the law and to adhere to the highest principles of business ethics. Accordingly, all employees must avoid activities which are in conflict, or give the appearance of being in conflict, with these principles and with the interests of the Company.

The following are potentially compromising situations which must be avoided. The term “conflict of interest” describes any circumstances that could cast doubt on an individual’s ability to act with total objectivity regarding the best interest of BAFPL.

1. BAFPL expects its employees not to be involved in any arrangement or circumstances, including family or other personal relationships, which might discourage them from acting in the best interest of BAFPL.
2. No employee shall act on behalf of a third party in transactions involving or potentially involving BAFPL. Employees or their relatives shall not have any financial interest in any outside enterprise which is currently doing business or seeks to do business with or is a competitor of the Company. If the employee finds out that BAFPL is doing business with any organization/ individual with which he/she is directly or indirectly involved, the employee is obliged to bring it to the notice of the Plant Head and Managing Director.
3. An employee should not be the final decision maker for any business contract or arrangement with any organization wherein his/her immediate family member are related to such an organization in any manner. In the event an employee finds himself / herself in a position of having to decide on such a contract or arrangement, he/she should refrain from taking such a decision and refer the matter to his/her manager for taking a decision, clearly informing his/her superior of his/her interest in the concerned organization.
4. Employees should not solicit or promote any personal / public cause or organization/association during working hours.
5. Employees should not attend Training/Promotional Programs organized by supplier/ vendor/ customers. However, if the business relationship necessitates, it should be approved by the Managing Director.

Other potential conflict of interest situations that can arise and should be avoided are:

6. Outside employment or any other obligation or relationship which could cause the employee to use his position and influence within the Company which tantamount to conflict of interest.
7. Unauthorized divulging of information knowingly or unknowingly (including sharing physical material) is a violation of the conflict of interest policy.

8. Accepting or offering substantial gifts, excessive entertainment, favours or payments which may be deemed to constitute undue influence or otherwise be improper or embarrassing to the Company.
9. Participating in civic or professional organizations that might involve divulging confidential information of the Company.
10. Initiating or approving any form of personal or social harassment of employees.
11. Investing or holding outside directorship in suppliers, customers, or competing companies, including financial speculations, where such investment or directorship might influence in any manner a decision or course of action of the Company.
12. Borrowing from or lending to employees, customers or suppliers.
13. Improperly using or disclosing to the Company any proprietary information or trade secrets of any former employer or other person or entity with whom obligations of confidentiality exist.
14. Unlawfully discussing prices, costs, customers, sales or markets with competing companies or their employees.
15. Making any unlawful agreement with distributors with respect to prices.
16. Improperly using or authorizing the use of any inventions which are the subject of patent claims of any other person or entity.
17. Engaging in any conduct which is not in the best interest of the Company.
18. Each employee must take every necessary action to ensure compliance with these guidelines and to bring problem areas to the attention of higher management for review.

Violations of this conflict of interest policy may result in discharge without warning.

### **1.b Integrity in Personal Conduct**

Workplace integrity starts with honesty, decency and trustworthiness, following through on commitment and being honourable with our actions.

BAFPL expects its employees to:

1. Conduct themselves with integrity and professionalism in all situations and at all levels, be it in dealing with customers, colleagues, vendors, within the framework of BAFPL values and culture
2. Transact with others in a fair and dignified manner, including being diversity sensitive.
3. Be responsible for fair representation and accuracy of information in the documents prepared, authorized or approved or signed off.

### **1.c Outside Employment**

Employees (at all grades) shall not participate in any outside activity that could or appears to interfere with the performance of their or other employees' duties and responsibilities, affect their independent and objective judgment, compete with an BAFPL business, or discredit BAFPL. Employees should not use BAFPL image or influence, directly or indirectly, for personal gain or benefit. In this regard, an employee, while on the job or as an BAFPL representative, should not solicit customers to hire or contract with him/her for outside work of any kind.

### **1.d Receiving and Giving Gifts and Entertainment**

1. BAFPL should not pay or accept / receive any gift and Entertainment, consideration or favour in cash or kind for self (or any family members or relatives) from any person including, but not limited to, vendor, customer, stake holder, business partners or any one with whom they are dealings with on behalf of BAFPL.
2. However, if the business relationship necessitates accepting any gift, such individual may accept the same and should be forwarded to the HR team for necessary action.
3. All gifts received, irrespective of the value should be reported to the HR team so they can register the content and open the gift item. Gifts of value of Indian Rupees (Rs.1000/-) or below can be handed over to the recipient. If the value of the gift exceeds the limit specified, the HR team will bring it to the notice of Managing Director who will in turn determine the next course of action.
4. Notwithstanding the foregoing, in no circumstances should the gift be accepted in the form of cash, whatever the value is.

## **2. Positive Work Environment**

BAFPL shall not discriminate any person based on age, race, caste, ethnic origin, religion, political affiliation, gender, marital status, or disability. Unless any law or regulations or the subject job warrants us to do otherwise, BAFPL will recruit, select, develop, transfer, advance people solely on merit basis and reward people on the basis of their performance and potential, without discrimination on grounds of age, race, caste, ethnic origin, religion, political affiliation, gender, marital status, or disability.

### **2.a Anti-Bribery, Anti-Corruption, Anti-Fraud and Anti-Money Laundering**

1. BAFPL shall comply with all applicable Anti-Bribery, Anti-Corruption, Anti-Fraud and Anti-Money Laundering laws and will establish to check, report and prevent any breach of such Laws.
2. Employees will always encourage to show meritocracy and shall follow it as a principle while interfacing with others including other employees, government officials, business partners, Suppliers, contractors, agents etc. Therefore, giving or receiving an undue reward /bribe/corruption/extortion/embezzlement or anything to influence the behaviour of someone to obtain commercial advantage is discouraged. As law-abiding employees, you will not directly or indirectly pay any bribe to any other employee, Governmental officials, business associates, contractors, vendors, agents, etc.

### **2.b Enabling Work Environment & Harassment Free workplace**

1. BAFPL fosters an environment that is open, honest, straightforward and fair, respectful of the roles and views of others. BAFPL, with guidance from the Values, will encourage sharing of

required information with co-employees, to enable them to perform their jobs effectively efficiently and to contribute to the overall growth of BAFPL.

2. BAFPL is committed to provide a constructive work environment, free of any kind of harassments. Sexual harassment and/or discrimination based on age, race, religion, caste, gender, ethnic origin, disability, marital status, or any other base is prohibited. BAFPL expects that no employee will indulge in harassment of any kind. Employees are encouraged not to indulge in any activity, such as quarrels/ fights / violence of any nature which disturbs the work and the environment. Any act seen violating this norm, will attract disciplinary action.
3. Read, understand and abide by the Prevention of Sexual Harassment Policy (Refer Employee handbook for detail policy on Prevention of Sexual Harassment).
4. Treat all complaints in a sensitive, fair, timely and confidential manner
5. Employees will not use their position in the company to gain any illegal advantage or for committing any offence.
6. Bullying is unreasonable behaviour that is directed against an individual or group; by another individual or group and is derived from the misuse of power over the target of the behavior. This may include:
  - Verbal abuse, shouting
  - Excluding or isolating behaviour
  - Deliberately withholding information vital for effective work performance
  - Giving employees impossible assignments
  - Physical abuse
7. BAFPL expects and encourages its employees to ensure their personal conduct in public place and with the public should be dignified and reflect BAFPL's Values.
8. BAFPL respects the religious beliefs and practices of all employees

## **2.c Communication and Media Policy**

1. BAFPL encourages its employees to refrain from interaction/communication with the print and electronic media on matters related to the historical, current or future operations of BAFPL or which are likely to have an impact on the operations, reputation or image of BAFPL. Only authorized personnel are permitted to do so. Posting or discussing information concerning the BAFPL' services or business on blogs and social networking sites such as Twitter and Facebook are strictly prohibited, except for designated employees.
2. Employees should protect all trademarks, brand names and other proprietary material of BAFPL and of third parties in their care and control. Employees should not disparage products or services of competitors or any third party and should avoid political or religious remarks in advertisements or in communication - internal or external.



## **2.d Respecting Privacy & Confidentiality of information**

1. Employees are expected to respect the privacy of other employees/Suppliers/Sub contractors/Customers and safeguard the confidentiality of information that BAFPL or you had about such employees/Suppliers/Customer/Sub Contractor etc.
2. BAFPL and its employees shall comply with any and all local and international privacy and data protection laws. Where needed non-disclosure agreement with employees/customer/suppliers etc. will be enforced.

### Guidelines:

- I. Sensitive information pertaining to an employee/customer/Suppliers must be obtained only with prior consent of such employee/customer/suppliers etc.
- II. Employee personal information gathered must be reasonable, relevant and not be intrusive in relation to the purpose for which it is collected. Such information shall only be used for the purpose for which it is collected and shall not be retained longer than necessary.
- III. All employee personal information shall be kept confidential and secure.

## **2.e Human Rights, Anti-Discrimination, Child Labour and Diversity**

BAFPL commits to providing a decent work environment by protecting our employees' security, property rights, privacy rights, civil and political rights, social and cultural rights as well as by preventing any form of harassment, moral and physical violence and inhumane or degrading treatment.

BAFPL prohibits any form of child labour which damages a child's physical, social, mental, psychological and spiritual development, depriving them of childhood and dignity. We do not tolerate any form of forced labour, involuntary prison and bonded labour

To prevent any form of whistleblowing, discrimination or harassment, we conduct regular audits of internal controls. We have also implemented a Code of Conduct as well as compulsory awareness trainings covering diversity, discrimination and human rights issues. Discrimination involves any distinction, exclusion or preference that has the effect of nullifying equality of treatment or opportunity based on illegitimate grounds: race, color, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, belonging to an indigenous people, political affiliation or other opinion, marital or family status, personal relationships and health status.

Candidates are informed prior to employment the terms and conditions of employment through offer letter and details are provided in appointment agreement. Upon hiring, company does not withhold any government issued identification or personal documentation in original. No fee is charged direct or indirect from the candidate before, during or after recruitment.

## **2.f Health, Safety and Environment**

As an organization, BAFPL:

- Is mindful of the impact of the activities, products and services of BAFPL on human health and environment over and above statutory requirements, to reduce adverse impact, if any.
- Takes particular care to adopt measures necessary to ensure the best possible protection against risks to health and safety, at the workplace, take steps to minimize the risk of accidents at the workplace.
- Expects its employees to follow all safety practices and procedures. Visitor's safety is the responsibility of the employee hosting the visitors.
- In keeping with its commitment to create a safe and healthy environment, prohibits the use of alcohol or illegal drugs or any other controlled/prohibited substance/material and tobacco products, including chewing tobacco, within campus.

## **2.g Fair Pay**

BAFPL ensures offering fair pay for job roles/work regardless of race or gender and being up-front and transparent with employees about compensation and benefits policies

## **3. Company assets, Confidentiality and Financial Integrity**

### **3.a Accurate and Complete Data, Records, Reporting & Funds**

BAFPL expects its employees to provide all stakeholders information that is correct and complete.

1. Records will be maintained as per requirements from customers, regulatory bodies or any other body etc., which is required as law of land.
2. Reporting of data will be as per company's reporting structure.
3. Employees will not misuse or misappropriate the funds of the company in any manner

### **3.b Usage of Company's Assets**

1. Protecting the assets of the company is a key responsibility of all the employees. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others or dealt with in a manner prejudice to the company.
2. BAFPL expects its employees to use diligence and responsibility in managing BAFPL funds under their care and responsibility. Funds must be used only for business purposes. All employees must take reasonable steps to ensure that BAFPL receives good value for its funds spent and must maintain accurate and timely record of expenditures.

### **3.c Electronic Resources Usage**

1. BAFPL encourages its employees to take back-up of all-important data regularly. Any usages that threaten the integrity of the system, the privacy, or that are otherwise unlawful, are hence forbidden.

2. BAFPL reserves the right to access and monitor all messages and files on its system, including information regarding employee internet use, as and when deemed necessary and appropriate. The electronic resources shall be used in an effective, ethical and lawful manner.
3. Employees are strictly prohibited from accessing online content of any nature not essential to perform their job.
4. Employees, who receive or notice obscene or inappropriate messages or content, are advised to report the same immediately to their Manager or the HR Department. BAFPL will not be responsible for actions of employees deemed illegal with respect to the usage of electronic resources.

### **3.d Protecting Resources handling Confidential Information**

1. Employees are expected to use the information received in the course of their employment, only for the purpose it is intended for or normally used, and never for personal gain or for a third party's gain, nor disclose the confidential data or information to expect on need basis and with a confidentiality undertaking from such third parties.
2. BAFPL has many kinds of business relationships with many organizations and individuals. BAFPL expects its employees to take special care in handling confidential information of its customers, potential customers, suppliers, potential suppliers or any other third party, with responsibility.
3. In keeping with the terms of employment, all employees are expected to devote themselves fully to the responsibilities entrusted upon them while engaged with the BAFPL full time. They are expected not to serve as an employee, agent, director, partner or consultant of any other business enterprise which could lead to conflict of interest. Any employee including the newly joined employee at the time of joining, shall disclose any association with the third parties as and when such association is established.
4. Employees should not, knowingly, or unknowingly make false or misleading statements regarding its competitors or the products of its competitors, customers or suppliers.

### **3.e Intellectual property**

1. BAFPL expects its employees to secure the BAFPL's rights in the inventions and any copyrights, patents, trademarks or other intellectual property rights including all BAFPL pertinent information and data.
2. All obligations with respect to any intellectual property should continue to remain the same even after separation from BAFPL.

## **4. Relations with Customer**

BAFPL recognizes its customers are of paramount importance and we will prosper and succeed only to the extent that we meet and exceed the needs of our customers. Our relationships with customers must reflect BAFPL standards of service, excellence and integrity.

BAFPL always expects its employees to:

1. Promptly respond to all customer complaints and queries
2. Handle all customers fairly and diligently
3. Commit themselves, as professionals, to uphold the trust placed by the customers and ensure all the commitments that are legitimately made are honoured.
4. Deliver quality services that reflect professional capabilities that are appropriate to the specific issues and needs of the customers.
5. Not solicit the customers support for any purpose, not associated with the official duties and responsibilities of their positions.
6. Comply with all the code of conducts and terms agreed with customer.
7. Comply with all applicable laws and regulations

### **Compliance with Law, Rules, Regulations and Policies**

Employees are required to comply with all the applicable laws including but not limited to Minimum Wages Act, Laws pertaining to Anti Bribery, Laws pertaining to labour and employees. This Code of Conduct sets a higher standard than, but does not conflict with, legal requirements.

Custom of local practices never take precedence over applicable legal requirement. If any conflict between this Code and applicable laws are found, concerns can be raised as prescribed under this Code.

### **Reporting Potential Code Violations**

All employees have an obligation to uphold the ethical standards of BAFPL. If any violation is observed concerning behaviour or one that may represent a violation of Code, the same should be raised promptly. Doing so, will allow BAFPL an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, security or the reputation of BAFPL.

Employees should not deride or criticize BAFPL, its businesses and policies in any forum – public, social media or otherwise. Criticism, complaint or concern should be shared within the organization with members of the management team, including the reporting manager and HR team, for its resolution.

Any concerns/feedback can be raised by writing to [feedback@bhatialloy.com](mailto:feedback@bhatialloy.com)

### **Disciplinary Action for Code Violations**

Ignorance of the Code is not an excuse and any breach, whether intentional or otherwise, would be viewed as a serious breach of the Code. The actions shall include but not limited to termination of the employee.



### Contact Information

Email: [feedback@bhatiaalloy.com](mailto:feedback@bhatiaalloy.com)

### Disclaimer

The company reserves the right to modify, suspend or revoke the Code and any related policies, procedures, and programs at any time.