

CODE OF BUSINESS CONDUCT

TOPICS

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- Reporting Potential Code Violations
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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 our 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.

Below are the various functions of Bhatia Alloy:

Core Functions	Support Functions	Enabling Functions
Production – Forging and Machine Shop	Purchase and Stores	Finance and Accounts
Quality Assurance and Quality Control	Materials	Human Resources
Engineering		Sales and Marketing
New Product Development		Digital Marketing
Machine Maintenance		Data Management

About our customers

BAFPL have its business relations with all top 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.



Why do we need Code of Conduct:

Code of conduct clarifies an organization's mission, vision and values, linking them with standards of professional **conduct**.

The **code** articulates the values the organization wishes to foster in leaders, employees, customers, vendors and, in doing so, defines desired behavior.

- Strengthens desirable behavior; prevent and deter undesirable behavior
- Enhances company's core values, beliefs and sets the right culture
- Builds a reputation of the company in the market
- Keeps the company and its employee's from violating laws and regulations
- Fosters an environment of trust and ethical behavior

CODE OF BUSINESS CONDUCT

Purpose of Code:

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 of Code:

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).

CODE OF BUSINESS CONDUCT

Policy

Business Ethics

- Conflict of Interest
- Integrity in Personal Conduct
- Outside Employment
- Receiving and Giving Gifts and Entertainment

Positive Work environment

- Anti-Bribery, Anti-Corruption, Anti-Fraud and Anti-Money Laundering
- Enabling Work Environment & Harassment Free workplace
- Communication and Media Policy
- Respecting Privacy & Confidentiality of information
- Human Rights, Anti-Discrimination, Child Labour and Diversity
- Health, Safety and Environment
- Fair Pay

Company Assets, Confidentiality, financial Integrity

- Accurate and Complete Data, Records, Reporting & Funds
- Usage of Company's Assets
- Electronic Resources Usage
- Protecting Resources handling Confidential Information
- Intellectual property

Relations with customer

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Business Ethics

Conflict of Interest

“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.

Key Highlights:

1. Employees should not to be involved in any arrangement or circumstances, including family or other personal relationships.
2. 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
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(s) are involved.
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.

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Business Ethics Integrity in Personal Conduct

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

Key Highlights:

1. Integrity and professionalism in all situations and at all levels
2. Being Fair, dignified and **diversity sensitive**
3. Responsible for accuracy of information in the documents

Business Ethics 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

Key Highlights:

1. Employees should not use BAFPL image or influence, directly or indirectly, for personal gain or benefit
2. 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.

CODE OF BUSINESS CONDUCT

Business Ethics

Receiving and Giving Gifts and Entertainment

Key Highlights:

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 with whom they are dealing with on behalf of BAFPL.
2. 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. Gifts of value of Indian Rupees (Rs.1000/-) or below can be handed over to the recipient
4. In no circumstances should the gift be accepted in the form of cash, whatever the value is

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Positive Work Environment

Anti-Bribery, Anti-Corruption, Anti-Fraud and Anti-Money Laundering

Key Highlights:

1. BAFPL shall comply with all applicable Anti-Bribery, Anti-Corruption, Anti-Fraud and Anti-Money Laundering laws
2. Employees will always encourage to show meritocracy and shall follow it as a principle while interfacing with others
3. Giving or receiving an undue reward /bribe/corruption/extortion/embezzlement or anything to influence the behaviour of someone to obtain commercial advantage is discouraged

Positive Work Environment

Enabling Work Environment & Harassment Free workplace

Key Highlights:

1. BAFPL fosters an environment that is open, honest, straightforward and fair, respectful of the roles and views of others
2. BAFPL is committed to provide a constructive work environment, free of any kind of harassments.
3. Treat all complaints in a sensitive, fair, timely and confidential manner
4. BAFPL respects the religious beliefs and practices of all employees
5. 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.

CODE OF BUSINESS CONDUCT

Positive Work Environment

Communication and Media Policy

Key Highlights:

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. Only authorized personnel are permitted to represent BAFPL
2. Employees should protect all trademarks, brand names and other proprietary material of BAFPL and of third parties in their care and control.

Positive Work Environment

Respecting Privacy & Confidentiality of information

Key Highlights:

1. Employees are expected to respect the privacy of other employees/Suppliers/Sub contractors/Customers and safeguard the confidentiality of information
2. BAFPL and its employees shall comply with any and all local and international privacy and data protection laws

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Positive Work Environment Human Rights, Anti-Discrimination, Child Labour and Diversity

Key Highlights:

1. BAFPL commits to providing a 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.
2. BAFPL prohibits any form of child labour
3. To prevent any form of whistleblowing, discrimination or harassment, regular audits are conducted and compulsory awareness trainings are conducted on Code of Business conduct covering diversity, discrimination and human rights issues.

Positive Work Environment Health, Safety and Environment

Key Highlights:

1. BAFPL is mindful of the impact of the activities, products and services of BAFPL on human health and environment
2. BAFPL takes particular care to adopt measures necessary to ensure the best possible protection against risks to health and safety
3. BAFPL, 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

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Positive Work Environment

Fair Pay

Key Highlights:

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

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Company Assets, Confidentiality and Financial Integrity

Accurate and Complete Data, Records, Reporting & Funds

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

Key Highlights:

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.

Company Assets, Confidentiality and Financial Integrity

Usage of Company's Assets

Key Highlights:

1. Protecting the assets of the company is a key responsibility of all the employees.
2. BAFPL expects its employees to use diligence and responsibility in managing BAFPL funds under their care and responsibility

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Company Assets, Confidentiality and Financial Integrity

Electronic Resources Usage

Key Highlights:

1. BAFPL encourages its employees to take back-up of all-important data regularly.
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.
3. Employees are strictly prohibited from accessing online content of any nature not essential to perform their job.

Company Assets, Confidentiality and Financial Integrity

Protecting resources handling Confidential Information

Key Highlights:

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.
2. Employees should take special care in handling confidential information of its customers, potential customers, suppliers, potential suppliers or any other third party, with responsibility.
3. Employees should not, knowingly, or unknowingly make false or misleading statements regarding its competitors or the products of its competitors, customers or suppliers.

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Company Assets, Confidentiality and Financial Integrity

Intellectual Property

Key Highlights:

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.

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Relations with Customer

BAFPL recognizes its customers with paramount importance

Key Highlights:

BAFPL always expects its employees to:

1. Promptly respond to all customer complaints and queries
2. Handle all customers fairly and diligently
3. Deliver quality services that reflect professional capabilities that are appropriate to the specific issues and needs of the customers.
4. Comply with all the code of conducts and terms agreed with customer.
5. Comply with all applicable laws and regulations

CODE OF BUSINESS CONDUCT

Compliance with Law, Rules, Regulations and Policies

1. Employees are required to comply with all the applicable laws
2. Custom of local practices never take precedence over applicable legal requirement

Reporting Potential Code Violations

1. All employees have an obligation to uphold the ethical standards of BAFPL
2. Employees should not deride or criticize BAFPL, its businesses and policies in any forum
3. Any concerns/feedback can be raised by writing to feedback@bhatialloy.com

Disciplinary Action for Code Violations

Ignorance of the Code would be viewed as a serious breach of the Code. The actions shall include but not limited to termination of the employee.