



JAMNA AUTO INDUSTRIES LIMITED

Code of Conduct for Suppliers and Vendors

At Jamna Auto Industries Limited, we are committed to conducting business ethically, lawfully, and responsibly. We believe that a responsible and sustainable supply chain is fundamental to delivering high-quality products and maintaining the trust of our stakeholders. This Supplier & Vendor Code of Conduct (the "Code") sets forth the principles and standards that all suppliers, vendors, service providers, and contractors are expected to follow while conducting business with or on behalf of Jamna Auto Industries Limited ("the Company").

The purpose of this Code is to promote ethical decision-making and foster fair, legal, and responsible business practices throughout our supply chain. Ensure consistency in business conduct and reinforce our commitment to maintaining high standards of integrity and responsibility.

1. Applicability

This Code applies to all third parties who provide goods and/or services to the Company, including agents, contractors, dealers, distributors, retailers, service providers, consultants, and business intermediaries ("the Suppliers").

2. Honest and Ethical Business Conduct

You are required to uphold the highest standards of personal and professional integrity and honesty in all your dealings. All transactions and interactions must be conducted with integrity, honesty, and transparency, ensuring accurate representation of facts, capabilities, and performance. You must act in a manner that supports the Company's reputation and business interests, even when not directly on Company premises.

3. Fair Labour Practices and Human Rights

The Company is committed to upholding human rights and maintaining the highest standards of working conditions. Suppliers must uphold the fundamental human rights of their employees and treat them with dignity and respect, in accordance with internationally recognized standards and applicable laws.

a) Working Conditions, Health, and Safety

- **Safe Environment:** You must provide a safe, healthy, and clean environment that minimizes occupational hazards and ensures the well-being of all workers and employees.
- **Compliance:** Adopt practices and procedures to ensure health and safety in the workplace, complying with all relevant EHS (Environmental, Health, and Safety) laws and standards.
- **Training:** Workers must be provided with necessary safety training and proper personal protective equipment (PPE).

b) Prohibition of Forced and Child Labour

- **Zero Tolerance:** You must strictly prohibit all forms of slavery, modern slavery, servitude, child labour, forced or compulsory labour, and human trafficking within your operations and across your entire supply chain.



- **Voluntary Employment:** All employment must be voluntary, and workers must have the freedom to leave or change employment after reasonable notice, in compliance with contracts and law.
- **Minimum Age:** Do not employ children below the minimum legal working age in the country of operation, or under the age of 18 for hazardous work.

c) **Non-Discrimination and Diversity**

- **Equality and Dignity:** You must foster a culture where all individuals are treated with dignity, respect, and fairness.
- **Prohibition of Discrimination:** Do not engage in or tolerate behaviour or practices that discriminate or offend individuals based on their race, caste, religion, gender, color, nationality, ethnic origin, disability, sexual orientation, political opinions, or other protected characteristics.
- **Fair Wages and Working Hours:** Adhere to all applicable laws regarding wages, benefits, and standard working hours, including overtime and compensation.

d) **Anti-Harassment:** Suppliers must provide a work environment free from any form of harassment, including sexual, verbal, psychological, or physical harassment. All workers must be treated with dignity, fairness, and respect. Suppliers are expected to implement measures that prevent sexual harassment and promote a safe, respectful, and inclusive workplace. This includes establishing clear policies and procedures for reporting and addressing harassment complaints, as well as setting up a confidential whistle-blower mechanism to enable employees to report concerns without fear of retaliation.

e) **Workplace Ergonomics:** Suppliers shall adopt ergonomic workplace design to support employee well-being and efficiency. This included that workstations, tools, and machinery are designed to minimize strain, support proper posture, and reduce the risk of injury from repetitive tasks or poor setup. Equipment are suitable for all workers, including persons with disabilities. Adequate working conditions—including lighting, temperature, noise, and vibration—are maintained.

4. **Ethical Business Practices**

Suppliers must adhere to the highest standards of ethical conduct. Company maintains a strict zero-tolerance policy toward all forms of corruption, bribery, and fraudulent activity.

- a) **Anti-Corruption and Anti-Bribery:** Suppliers must not engage in any form of bribery, kickbacks, or corruption. Offering, soliciting, or accepting bribes or any form of improper payment or advantage is strictly prohibited.
- **Prohibited Acts:** You must never, directly or indirectly, offer, promise, or give anything of value (including money, gifts, services, or entertainment) to any Company director, employee, or government official to improperly influence any business decision or secure an unfair advantage.
 - **Acceptance of Favours:** You must not demand or seek bribes, benefits, or favours from Company employees.



- **Gifts and Hospitality:** Any gifts, entertainment, or business courtesies offered to Company employees must be modest, reasonable, and customary in the course of business, clearly documented, and must not exceed a value that could influence an employee's professional judgment (the Company's internal threshold is Rs. 5,000).

- b) **Conflict of Interest:** You must avoid situations where your personal interests, or those of your employees, may conflict with or appear to conflict with the interests of the Company. Any potential or actual conflict of interest related to your dealings with the Company must be promptly disclosed to the Company's Legal & Compliance team.

5. Protection of Assets and Information

- a) **Confidential Information and Trade Secrets:** You are responsible for protecting the Company's Confidential Information (written, oral, visual, and electronic) from loss, damage, misuse, or unauthorized disclosure. This includes, but is not limited to, business plans, drawings, designs, proprietary formulas, market strategies, unpublished financial data, customer details, and employee data.

Confidential Information may only be shared within your organization on a strictly need-to-know basis and solely for the purpose of fulfilling your contract with the Company. You must sign and adhere to all terms of any Non-Disclosure or Confidentiality Agreements (NDAs) executed with the Company.

You must implement appropriate security measures to safeguard any Company data, especially personal data, from misuse, loss, or unauthorized access.

- b) **Intellectual Property Rights (IPR):** You must respect the IPR of the Company and its other business partners, and must not infringe upon or unlawfully use Company's logos, trademarks, patents, or trade secrets. All work created for the Company, as defined in the contract, shall be considered the property of Jamna Auto Industries Limited.

6. Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national, and international laws, rules, and regulations in all jurisdictions where you operate or transact business with the Company. This includes but is not limited to laws relating to:

- Labour and employment:
- Health and safety
- Environmental protection
- Anti-corruption
- Trade and export controls
- Competition and antitrust
- Data privacy and protection

7. Anti-trust and Fair Competition

Suppliers must compete fairly in compliance with antitrust and competition laws. Practices such as price fixing, bid rigging, division of markets, allocation of customers or territories, boycotts and collusive bidding are strictly prohibited.



8. Export Control and Economic Sanctions

You must comply with all applicable export controls, economic sanctions, embargoes, and customs laws related to the cross-border transfer of goods, technology, and services.

The Company will not engage with any party that is sanctioned, embargoed, or otherwise prohibited by relevant government authorities. You must perform necessary due diligence to ensure compliance.

9. Responsible Sourcing and Counterfeit Prevention

- a) **Responsible Sourcing and Manufacturing:** Your selection as a Business Partner is based on quality, delivery service, price competitiveness, ESG (Environmental, Social, and Governance) parameters, and reputation. You must not deal with or purchase from parties that directly or indirectly finance or benefit terrorism, narcotics, or human trafficking.
- b) **Counterfeit Parts:** You must guarantee the authenticity and quality of all parts, components, and materials supplied to the Company. The use, procurement, or distribution of counterfeit, fraudulent, or suspect parts in the production of any goods for the Company is strictly prohibited. All materials must be sourced from verifiable, authorized, and lawful suppliers.

10. Environmentally Responsible

The Company encourages Suppliers to embed environmental sustainability into their operations. Suppliers shall ensure compliance with applicable environmental laws and regulations and expected to demonstrate continuous improvement in environmental performance.

- a) **GHG emissions:** Suppliers shall actively measure, monitor, and reduce their greenhouse gas (GHG) emissions across their operations. Suppliers shall take proactive measures to reduce their carbon dioxide (CO₂) emissions and develop and implement plans to reduce their carbon footprint. This involves implementing energy-efficient technologies, minimizing power consumption, improving energy efficiency, transitioning to low-carbon and renewable energy sources, and adopting best practices to reduce their overall carbon footprint.
- b) **Use of Renewable Energy:** Suppliers are encouraged to transition to renewable energy sources and develop a clear roadmap toward achieving higher renewable energy usage and installing RE infrastructure as part of long-term operations.
- c) **Energy Efficiency:** Suppliers are expected to actively improve energy efficiency across their operations by adopting energy-saving technologies, optimising processes, and reducing overall energy consumption. Wherever feasible, Suppliers should transition to cleaner energy sources and implement energy management practices to support the Company's sustainability goals.
- d) **Air Quality and Emissions Control:** The Company expects Suppliers to integrate air quality management into their operational and to continuously work toward reducing their environmental footprint. Suppliers shall take active measures to maintain and improve ambient air quality as part of its broader Environmental, Social, and Governance (ESG) Policy. Suppliers shall comply with applicable air quality regulations and standards and adopt best practices to minimize emissions, including improving production processes, using safer and more environmentally responsible substances and chemicals, cleaner fuels and implementing cleaner technologies where feasible.



- e) **Waste Minimisation:** Suppliers are expected to implement effective waste minimisation practices as part of their commitment to environmental responsibility. This includes optimising processes, substituting materials with better alternatives, and adopting cleaner production techniques to reduce the volume and toxicity of waste generated. Suppliers should also reduce reliance on landfill disposal by promoting recycling, reusing materials, and implementing efficient waste segregation and treatment methods.
- f) **Chemical Management:** Suppliers must ensure the safe identification, handling, storage, use, transportation, and disposal of chemicals to protect employee health and safety, prevent environmental harm, and comply with applicable regulations. Suppliers are expected to minimize chemical risks by using proper labelling, segregation, and storage practices, and to prevent incidents such as fire, explosion, leakage, or contamination. Wherever feasible, Suppliers should replace hazardous chemicals with safer alternatives and strive to reduce overall chemical usage.
- g) **Water Stewardship:** Suppliers shall take active steps toward optimizing water usage within their operations, implementing rainwater harvesting systems, and maximizing the recycling, reuse, and recovery of process water. Suppliers are expected to ensure that water discharges meet applicable quality standards to prevent contamination of local water bodies. They are encouraged to adopt sustainable water management practices, monitor water consumption, and continuously seek opportunities to reduce their water footprint in alignment with local regulations and environmental standards.

11. Alignment with Company's ESG Targets

The Company's Environmental, Social, and Governance (ESG) targets are available on Company's website at <https://www.jaispring.com/esg-related-policies.html>.

To support the Company's commitment to environmental sustainability and responsible business practices, Suppliers are expected to align their operations with the Company's ESG goals. Suppliers are encouraged to adopt responsible practices that contribute to achieving these targets and to integrate ESG considerations into their own operations and business.

Suppliers are expected to take proactive measures to achieve these goals, maintain records of their ESG performance, and demonstrate measurable and transparent progress.

13. Dealing with the Company

All information provided to the Company (including quality certifications, financial data, and compliance reports) must be accurate, clear, and not misleading. Contractual Adherence: You must abide by the terms and conditions of all contracts executed with the Company.

14. Grievance Mechanism

Suppliers are encouraged to report any unethical behaviour, suspected violation of this Code, or illegal activity involving their dealings with Jamna Auto. Reports can be submitted to the Company at grievance@jaispring.com.

Company ensures confidentiality and prohibits retaliation against any individual who reports concerns in good faith.



15. Audits, Assessments & Compliance Monitoring

Suppliers must maintain accurate records to demonstrate compliance with this Code. Company reserves the right to conduct audits or assessments of suppliers and their operations, including visits to facilities and review of records. Any violation of this Code may lead to immediate termination of the business relationship, exclusion from future business.

16. Communication and Training

Suppliers are expected to communicate the principles outlined in this Code to their employees, subcontractors, and other relevant parties within their supply chain. Appropriate training should be provided to relevant personnel to promote awareness, understanding, and compliance with ethical business practices. Additionally, Suppliers should establish and maintain effective policies, procedures, and management systems to support and uphold the standards set forth in this Code.

17. Acknowledgment and Acceptance

Suppliers are required to acknowledge and agree to abide by this Code as a condition of doing business with Jamna Auto Industries Ltd.

For any questions or concerns regarding this Code, please contact at email **thomson.reddy@jaispring.com**.