

# Bhate & Raje Construction Co. Pvt. Ltd.

## Supplier Code of Conduct

Bhate & Raje Construction Co. Pvt. Ltd (BRCCPL) is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards of our Suppliers. We view our Suppliers as partners and we care about the way they do business when providing goods or services, including construction works and services.

The Supplier Code of Conduct (Code) describes the minimum expectations in the areas of: integrity, ethics and conduct; conflict of interest, gifts, benefits and hospitality; corporate governance; labour and human rights; health and safety; and environmental management. Suppliers are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

### Application of this Code

Bhate & Raje Construction Co.Pvt.Ltd seeks to work with its Suppliers to meet and exceed minimum expectations as outlined in this Code and continuously strives to improve the standard of its business practices. By Supplier, BRCCPL means any entity that supplies goods or services, including construction works and services, to BRCCPL. Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier and its related entities. Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured or services are performed. Fundamental to this Code is an expectation that all Suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations. BRCCPL expects all existing and new Suppliers to commit to the Code. Suppliers should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this code.

BRCCPL expects Suppliers to communicate the Code to their related entities, Suppliers and subcontractors who support them in supplying goods and services to BRCCPL, so that they are aware of, understand and comply with the Code.

### Reporting misconduct, unethical behaviour or suspected corruption

If a Supplier considers that another Supplier has deviated from or breached their obligations under this Code, it is expected to report these concerns to [report@bhateraje.com](mailto:report@bhateraje.com)

### Corrective action process

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with the relevant department personnel.

## A. Integrity, ethics and conduct

BRCCPL expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

### Business integrity

Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering, and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

### Record keeping and documentation

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

### Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring BRCCPL into disrepute.

### Confidentiality

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with BRCCPL.

## B. Conflict of interest; gifts, benefits and hospitality

BRCCPL believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

### Conflict of interest

Suppliers must:

- declare to the relevant department any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with BRCCPL; and
- avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with BRCCPL. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

