

Business Code of Conduct

At Roop Automotives Ltd. (RAL), we are steadfast in our commitment to maintaining the highest standards of ethical, professional, and legal conduct across all aspects of our business. This Code of Conduct encapsulates our principles and values, emphasizing **integrity, respect for human rights, and strict compliance with laws and regulations**. It reflects our aspiration to not only meet but exceed legal and ethical standards, fostering trust and long-term value for all stakeholders.

Scope

This Code applies to all employees, business partners, contractors and stakeholders associated with RAL. It provides a framework for ethical decision-making and conduct, ensuring consistency and accountability in every interaction and operation.

Policies

- 1. Ethical Business Practices:** We encourage ethical practices throughout our supply chain and support our business partners in aligning with our principles. Mutual respect, transparency, and integrity are foundational in all collaborations.
- 2. Child Labour:** Child is a person who has not attained the age of 15 years under law of land. However as a best practice, at Roop Auto we do not hire person who has not attained the age of 18 years. Our Child Labour Policy is our position on not employing Minors and aims to ensure that our organization, its subsidiaries unit/s and everyone we are connected with such as vendors, suppliers etc., follows the law of land and cares for children's interests. As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labour is fundamental to us. We want to make sure that our organization does not take part in children's exploitation and also helps end it to the best of our ability.
- 3. Prohibition of Forced Labor and Modern Slavery:** RAL has a zero-tolerance policy for any form of forced or bonded labor, modern slavery or human trafficking. Employment relationships are entirely voluntary, and termination is guided by lawful notice periods.

4. **Fair Wages and Benefits:** we at RAL and its allied subsidiary provides fair and competitive compensation that meets or exceeds industry standards. We ensure full compliance with all applicable wage laws and regulations. Benefits are structured to reflect the values of employee's contributions to the company. Further we ensure equal pay to all for the same job.

5. **Anti-Bribery and Anti-Corruption :** RAL is dedicated to conducting all business activities with integrity, honesty, and highest ethical standards. Hence we strictly prohibits all forms of bribery, extortion, fraud, embezzlement and any other corrupt activities, whether involving public officials or private individuals. We are unwavering in our commitment to maintaining a corruption-free environment. Employees, contractors, Retainers, consultants and Business partners must exercise discretion and ensure that any gifts, hospitality, or other benefits must not be offered or received. Our aim is to prevent, discourage, and detect any corrupt practices within our operations and foster a corporate culture rooted in ethics, transparency and integrity.

6. **Conflicts of Interest:** Any conflicts of interest resulting from employment are to be absolutely avoided. In the case that such a conflict were to arise, employees were to report this immediately to their HODs/PH/HR or at Ethics Helpline. Every employee, of RAL shall not-

- Engage in any business, relationship or activity that might detrimentally conflict, either directly or indirectly with the interest of the company.
- Receive improper personal benefits to him/her/them - self or they/them/their family as a result of one's position in the Company.
- Misuse the position associated with his / her / their office or coerce or induce a benefit for himself / herself /themselves or others.
- Receive and retain any gift or entertainment from any person / company with which the company has current or prospective business dealings.
- Have any significant ownership interest in any supplier, customer, development partner or competitor of the company, without disclosing the same to the management.
- Have any consulting or employment relationship with any supplier, customer, business associate or competitor of the Company.
- Involve or engage in any other activity that could create the appearance of a conflict of interest and thereby impair the company's reputation.

- Appoint any related party as consultant, advisor, agent, intermediary, broker, or representative.

Any proved conflict of interest will lead termination from the service.

7. **Sustainability:** RAL is committed to sustainable development. This involves operating responsibly, creating innovative solutions to address environmental challenges and investing in ventures that generate long-term positive impacts. Our sustainability efforts focus on minimizing our environmental footprint while maximizing social and economic benefits. For further details our Sustainability policy can be referred.

8. **Work place Equality and Non-Discrimination:** RAL is an equal opportunity employer and strictly prohibit discrimination based on race, color, religion, gender, sexual orientation, and other protected characteristics. Employment decisions are made based on merit, and we enforce a zero-tolerance policy towards harassment in any form, ensuring a respectful and inclusive workplace. The compensations are purely based on merits that aligned with industry standards and equal pay for the job.

9. **Women's Rights and Gender Equality :** RAL is dedicated to promoting gender equity, inclusivity and ensuring a harassment-free work environment. Our DEIB policy, POSHww policy and Shashakt (शशक्त) – ERG for Females work towards women empowerment and their holistic inclusivity in the organization across levels. Our Women's Rights Policy aims to eliminate gender-based discrimination and empower women by ensuring equity in all areas, including recruitment, compensation, and career advancement. We also provide support for work-life balance and family-friendly policies.

10. **Rights of Minorities and Indigenous People:** RAL's policy on the rights of minorities and indigenous people aims to create an inclusive work environment that respects and values diversity. We are committed to preventing discrimination and promoting equal opportunities for all, regardless of background or cultural practices.

11. **Substance Abuse:** RAL does not allow Smoking, alcohol and drugs in the workplace. Use of Alcohol & Drugs are not acceptable at the workplace. In keeping with RAL's intent to provide a

safe and healthy work environment therefore possession, smoking / consumption of alcohol, drugs and other substance abuse in the workplace is strictly prohibited.

12. **Confidentiality:** All employees are required to maintain the confidentiality of sensitive information related to the company, its clients, and its partners. This information should only be used for business purposes and must not be disclosed without proper authorization.

13. **Environment:** RAL is committed to protecting the environment by complying with all relevant environmental, health, and safety regulations. We promote safe handling of products, reduce emissions, and minimize waste. Our goal is to operate sustainably, minimizing our impact on biodiversity, climate change, and water resources. We are committed to:

- Implement environmental friendly practices in all our business processes.
- Protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the identified external and internal issues.
- The effective control of environmental pollution (air, water, noise and stack emission etc.) and prevention of land pollution.
- Management of waste water and other industrial effluents effectively.
- Effectively implementing the environmental policy to fulfill the compliance obligations.
- Controlling the consumption of renewable resources (water, packing material & paper etc.) within limit & reducing the consumption of non-renewable resources (electricity, oil, petroleum products, natural gas etc.) & promoting the use of alternate source of energy.
- Instilling awareness among employees for maintaining a pollution free environment and enhancing environmental consciousness among interested parties.
- Continual improvement of the environmental management system to enhance environmental performance.

14. **Occupational Health & Safety :** The Occupational Health and Safety of all employees working for Roop Automotives Ltd. is of utmost importance & priority. RAL is dedicated & committed to providing a safe & healthy environment for its employees, associates, visitors, Community & Interested Parties. To support this, the organization has following in place:

- The Occupational Health & Safety Management Systems that are continuously reviewed for effectiveness by Top Management and Leadership Team.
- The resources including equipment & training to manage Health and Safety which will continually enhance Business Performance, minimize work-related incidents & ill health, Optimize Productivity & Motivate the Workforce.
- The Processes to identify hazards and eliminate risks wherever possible & method for setting & reviewing EHS Objectives & Targets for continual improvement.

15. **Ethics Escalation and Whistleblower Policy:** RAL has implemented a whistleblower mechanism (Speak Up) that allows employees/suppliers/business partners/stakeholders to report unethical behavior or policy violations by RAL employees, confidentially. This system is managed by an independent third-party service (Integrity Matters) to ensure reports are handled impartially and professionally. Incidents related to conflict of interest, business misconduct, violation of anti-bribery policy, anti-corruption policy, shall be reported via ethics helpline (Speak-Up). We are committed that whistleblowers are protected against any form of retaliation, ensuring a safe avenue for addressing concerns.

16. **Workplace Bullying :** bullying at work is strictly prohibited. Bullying includes behavior that intimidates, degrades, offends, or humiliates an employee, often in front of others. Bullying behavior creates feelings of defenselessness to the target and undermines an individual's right to dignity at work. Bullying is different from aggression. Whereas aggression may involve a single act, bullying involves repeated attacks against the target, creating an on-going pattern of behavior.

17. **Human Rights Policy:** RAL is committed to upholding the human rights of all individuals associated with the company. We ensure that everyone is treated with dignity, respect, and fairness, and we strictly prohibit any form of discrimination or harassment.

18. **Working hours :** RAL offices including manufacturing plants are compliant with law of land and best industry practices, in terms of working hours. To ensure a better work life balance multiple practices are been followed. RAL also strongly condemn the practice of extended working hours beyond the limit set by law to ensure mental and physical wellbeing of all associated human beings.

19. **Employee Participation :** RAL is committed to encourage employee participation resulting in fair, ethical, transparent and inclusive work culture. There are adequate number of formal and informal employee committees/groups at work which includes but not limited to safety committee, canteen committee, works committee, grievance redressal committee, employee resource groups etc. These committee/group represents all level of employees and ensure that their voice are heard.

20. **Chemical and Hazardous Substances :** RAL ensures the implementation of appropriate checks and practices to ensure the proper storage, handling, disposal of chemical and hazardous

substances, that are occur/consumed during its operational activities. The company does follow the practices but not limited to chemical inventory list having sufficient information, labelling, identification & storage of chemicals & hazardous substances, documented chemical emergency response, Valid MSDS, lists of restricted / banned chemicals for manufacturing, Foot operated eye washer, Safety warning sign indicating hazards, Risk Assessment with action plan; which ensuring a safe working place.

21. Financial Records: RAL shall prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the company conducts its business affairs. Internal control and audit procedures should comprehensively cover all the company's material business transactions and disposition of assets. All required information shall be accessible to company auditors and other authorised parties and government agencies

22. Ethical Conduct: RAL expects all its directors, employees, associates to act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct, at the company's premises, offsite locations, company sponsored business and social events, or at any other place where they are representing on behalf of the company. They shall also act and conduct free from fraud and deception.

This Code of Conduct is integral to RAL's commitment to ethical business practices. By adhering to these policies, we ensure that RAL operates with integrity, respects human rights, and fosters a sustainable and inclusive workplace.

Communication:

The policy shall be communicated internally and disseminated to all employees to raise awareness and establish system of accountability. The policy shall be available in our HRMS system The policy also stipulates expectations of business partners and other relevant external parties and so should be communicated actively to those with whom RAL has a contractual relationship.

AMENDMENT/WITHDRAWAL:

1. The Management further reserves the right to amend/alter and/or extend these rules at any time at its sole discretion.
2. This Policy supersedes all other policies, procedures, instructions, practices, rules or written or verbal representation to the extent that they are inconsistent.

Mr. Gaurav Jain

Director

Mr. Mohit Oswal

Chairman & Managing Director