



# Code of Conduct for Suppliers Policy

## Introduction

Techno Electric & Engineering Company Limited (TEECL) is dedicated to achieving sustainable growth by integrating Environment, Social and Governance (ESG) principles into its operations and when managing relationships with the value chain. The Company encourages its suppliers, who are a part of the value chain, to carry out their activities responsibly while complying to all applicable laws at any given time. Furthermore, TEECL insists its suppliers to introduce suitable processes, functions, and systems within their organisations that support compliance to the requirements of the Code of Conduct (CoC). We expect our suppliers and business partners to share and uphold these principles to their best knowledge.

This CoC will guide all suppliers who do business with TEECL including contractors, sub-contractors, vendors, consultants, business partners, and others to engage in ethical, responsible, and legal business practices, comply with all regulatory requirements, and implement policies and standards, provide training, as and when necessary.

## Implementation of Code of Conduct

1. Laws and Regulations
  - a. Suppliers must comply with all applicable laws, regulations, and industry standards in the countries where they operate. This includes, but is not limited to, laws regarding labour and human rights, health and safety, environmental protection, anti-corruption, and fair competition.
2. Non-Compliance
  - a. Failure to comply with this Code of Conduct may result in various consequences, including but not limited to termination of the contract, removal/suspension from bidding on future contracts, and any legal actions if necessary.

## Reporting Violations

1. Suppliers must promptly report any potential or actual violations of this Code of Conduct, laws, regulations, and others.
2. Suppliers should establish internal mechanisms for reporting, investigating, and addressing any compliance concerns or breaches.
3. TEECL will investigate and review the concerns and discuss the findings with the supplier.
4. Appropriate action must be undertaken by the supplier to resolve this breach and to avoid future violations.
5. All reported violations will be kept confidential.

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## **Compliance Audits:**

1. TEECL reserves the right to conduct periodic audits or assessments to verify supplier compliance with this Code of Conduct for Suppliers.
2. Suppliers shall cooperate with such audits and provide access to relevant records.
3. Suppliers are also urged to conduct due diligence of their suppliers, contractors and others to enable compliance throughout their supply chain.

## **Declaration**

1. All suppliers will provide a declaration confirming their understanding of TEECL's Code of Conduct. The format of the declaration is enclosed below as Annexure A.
2. All Procurement teams shall incorporate a Clause in all Purchase Orders (PO) on TEECL's Code of Conduct and the requirement of providing a Declaration as per Annexure B.

## **CODE OF CONDUCT FOR SUPPLIER**

TEECL requires suppliers, including their personal (employees or subcontractors), to endorse and adhere to the following Code of Conduct (CoC), in addition to complying with all relevant national and international laws and regulations. TEECL encourages suppliers to surpass mere compliance and fully embrace sustainability principles. During supplier evaluations, TEECL will consider regulatory compliance and ESG performance as significant criteria based on the requirements outlines in the Code.

### **Environmental Sustainability**

All Suppliers must comply with applicable environmental laws and regulations, including those related to waste management, emissions, and pollution control. Additionally, suppliers are encouraged to adopt sustainable practices and strive for continuous improvement in their environmental performance.

### **Labour and Human Rights**

Suppliers are required to uphold, honour, and safeguard human and labour rights, ensuring that their organization/entity does not participate in any form of abuses or violations.

1. Suppliers must uphold fundamental labour rights, including freedom of association, the right to collective bargaining, and the elimination of forced labour and child labour.
2. Suppliers must provide fair wages, overtime compensation, legally mandated benefits, maximum working hours, and in compliance with applicable laws.
3. Suppliers must provide a safe and healthy working environment for their employees, contractors, and visitors.
4. Suppliers must comply with all applicable health and safety laws and regulations and implement appropriate measures to prevent accidents, injuries, and occupational illnesses.
5. Employment or engagement of individuals below 18 years of age in any occupation or process is strictly prohibited.
6. There is a strict policy of zero tolerance towards any form of child labour within their establishments and supply chain.

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7. Suppliers are strictly prohibited from engaging in any form of forced labour, including compulsory or trafficked labour, indentured labour, bonded labour, or any other coercive practices involving direct or indirect use of force or intimidation
8. There is a zero-tolerance policy regarding slavery, mental and physical coercion, human trafficking, and debt bondage within the supply chain.
9. Suppliers must treat all employees and job applicants with fairness, dignity, and respect, regardless of race, colour, gender, gender identity, sexual orientation, religion, age, disability, national origin, or any other protected characteristic.
10. Suppliers must promote diversity and inclusion within their workforce and strive for equal opportunities.

### **Ethical Business Practices**

Suppliers are expected to exemplify the utmost level of integrity, ethics, and business conduct.

1. Suppliers must not offer, provide, or accept bribes, kickbacks, or any other form of illicit payments or benefits.
2. Suppliers must maintain accurate records of all business transactions and financial activities.
3. Suppliers must avoid any actual or perceived conflicts of interest that could compromise their ability to act in the best interests of TEECL.
4. Suppliers must disclose any potential conflicts of interest promptly so that appropriate action can be taken.
5. Suppliers must guarantee that all business and commercial transactions are conducted transparently and accurately documented in the company's books and records.
6. Suppliers are required to adhere to relevant anti-money laundering laws, conduct business exclusively with partners who uphold ethical responsibility, and accept funds solely from legitimate sources.
7. Suppliers must not offer or accept gifts, entertainment, or other favours that could influence business decisions or create the appearance of impropriety.
8. Modest and reasonable gifts or entertainment may be permissible, provided they do not violate applicable laws or create conflicts of interest.
9. Suppliers must respect the confidentiality of TEECL's proprietary information, trade secrets, and any other confidential or sensitive data obtained during the course of the business relationship.
10. Suppliers must ensure proper safeguards are in place to protect confidential information from unauthorized access or disclosure.
11. Suppliers must refrain from engaging in any activities that could be considered illegal practices of unfair competition and must ensure compliance with relevant competition laws.
12. Suppliers must respect and protect the intellectual property rights of TEECL and third parties.
13. Suppliers must ensure compliance with relevant laws and regulations regarding accounting and taxation, and fulfil their tax obligations promptly.
14. Products and services must meet the specifications, quality standards, safety requirements, and environmental criteria outlined in the relevant contract documents, as well as those mandated by applicable laws.

## **Review and Revision**

This Code of Conduct for Suppliers will be reviewed periodically to ensure its effectiveness, relevance, and compliance with changing laws, regulations, and societal expectations. Any necessary revisions will be made accordingly.

By adhering to this Code of Conduct for Suppliers, suppliers demonstrate their commitment to responsible and ethical business practices and contribute to the shared values of TEECL.

**Annexure A**  
(To be printed on Supplier's Letterhead)

**Declaration of Compliance to TEECL Code of Conduct**

To,  
Procurement Department  
Techno Electric & Engineering Co. Ltd.

Sub: Declaration of Compliance to TEECL Code of Conduct

I, [Your Name], on behalf of [Company Name], hereby declare our commitment to upholding and complying with the Code of Conduct established by TEECL. We understand the importance of maintaining ethical standards, promoting a respectful work environment, and conducting business with integrity. By adhering to this Code of Conduct, we strive to foster trust, transparency, and responsible practices within our company and in our interactions with stakeholders.

As representatives of TEECL, we affirm the following:

1. We have read, understood, and familiarized ourselves with TEECL's Code of Conduct.
2. We undertake to comply with TEECL's Code of Conduct, all applicable laws, regulations, and industry standards in our business operations.
3. We will conduct ourselves in a professional manner, treating all individuals with respect, fairness, and dignity, regardless of their race, colour, gender, gender identity, sexual orientation, religion, age, disability, national origin, or any other protected characteristic.
4. We will uphold high standards of integrity, honesty, and ethical behaviour in all our dealings with clients, colleagues, suppliers, and other stakeholders.
5. We will promote a safe and inclusive work environment, free from discrimination, harassment, or any form of offensive behaviour.
6. We will responsibly manage environmental resources, minimize our ecological footprint, and comply with environmental laws and regulations.
7. We agree that these clauses form an integral part of TEECL's purchase order, work order, or any contact.
8. We will promptly report any suspected or observed violations of the Code of Conduct to the appropriate channels within our organization. In the event of failure, we will promptly take necessary actions to comply with the Code of Conduct.
9. We authorise TEECL to conduct due diligence/ audit/ inspection and assure cooperation in the process if required.
10. We acknowledge that non-compliance with the Code of Conduct may result in disciplinary action, including but not limited to retraining, warnings, suspension, or termination of employment or business relationships, as deemed appropriate by TEECL.

By signing this Declaration of Compliance, we affirm our commitment to upholding the values and principles outlined in the Code of Conduct of TEECL.

Printed Name: [Your Name]  
Title: [Your Position within the Company]  
Name of the Company:  
Date: [Date]

Signature & Seal

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## **Annexure B**

Clause to be included in the PO/ WO/ Agreement/ Contract, etc.

All suppliers are expected to adhere to our Suppliers Code of Conduct, available on our website: [techno.co.in](http://techno.co.in) and provide a Declaration of Compliance to TEECL Code of Conduct, as an integral part of their agreement with us, ensuring ethical and responsible business practices throughout our partnership.