CODE OF CONDUCT FOR BUSINESS PARTNERS
FOREWORD

Dear Business Partners

In keeping with global best practices and regulatory changes in our country (India), BIPL have drawn Code of conduct for our stakeholders in September 2017. This code document explicitly references our values, is linked with our vision, which defines our commitment towards our stakeholders reasonable aspirations, outlines the duties and responsibilities of all the stakeholders of our business ecosystem. These include our commitment to sustainable development as well as adoption of basic principles in the fields of human rights and working conditions, quality and environmental management, health and safety of employees, fair market behavior and combating corruption.

We expect the same fundamental understanding from our business partners. In this respect, these principles go beyond mere adherence to the laws and regulations. For BIPL, mutual trust and compliance with the contents of these principles are therefore indispensable elements of a successful business partnership. We expect the business partners endeavour to ensure that sub suppliers engaged also comply with this code of conduct.

C Shyamsundar
Sr Vice President ,SDI

P Krishnan
Vice President, QA
Treatment of Employees
Our business partners observe fundamental labour rights on the basis of the applicable national legislation.

Human rights
Business partners undertake to adhere to the national and international applicable laws and regulations at their locations worldwide. They ensure that human rights are preserved and, in particular that human dignity is safeguarded.

Child labour
Our business partners employ only people to perform work who have reached the corresponding age according to applicable national legislation. Our business partners will observe and respect the rights of children.

Forced labour
Our suppliers reject all forms of forced labour and respect the principle of freely chosen employment.

Freedom of association
Business partners must respect the freedom of association and the right to form interest groups. They thus grant their employees the right to serve their interests, within the framework of national laws and regulations.

Equal opportunities
Our business partners do not tolerate any discrimination against employees on the grounds of race, religion, gender, age, social or ethnic origin, nationality, disability or sexual orientation, political or trade union engagement, belief and ideology.

Fair working conditions
Our business partners pay remunerations and social benefits which are at least in accordance with the national legal stipulations, provisions or agreements. The applicable regulations governing working time and leave are observed.

Work safety and health protection
Our business partners promote the safety and health of their employees through appropriate provisions such as preventive and rigorous occupational safety and health measures and a safe and healthy working environment.

Environmental Protection
Business partners are committed to sustainable, responsible, and considerate handling of resources and raw materials.
In manufacturing products and executing procedures, they ensure an efficient deployment of energy and resources, management of waste and hazardous material and adhere to the applicable environmental standards. They require their employees to minimize environmental endangerment while performing their jobs and to support the considerate handling of resources.
We shall endeavour to offset the effect of climate change in our activities.
Working hours and compensation
Business partner shall comply with applicable laws, agreements and industry standards on working hours and compensation.

Responsible Raw material procurement
The business partners support all efforts to ensure responsible procurement of resources. They advocate a carefully considered allocation of resources in order to avoid procurement and utilization of raw materials that were attained unlawfully or by ethically objectionable or unacceptable means (conflict minerals). To exclude future procurement in this manner, and to identify possible conflict minerals in the products along the supply chain, the business partners are obliged to take measures to disclose the origin or source of their resources.

Avoiding conflicts of interest
Transparency in all business processes is extremely important to business partners. Brakes India expects its business partners to make decisions based solely on factual considerations and to avoid in particular those personal or familial conflicts of interest that could lead to irrelevant considerations.

Free competition
Our business partners behave fairly in competition and observe the applicable legal provisions that safeguard free competition. Our business partners do not make agreements or concerted practices with other companies aimed at or resulting in the prevention, restriction or distortion of competition in accordance with the applicable antitrust regulations and do not abuse any dominant position on the market in an unlawful manner.

Corruption
Our business partners ensure compliance with applicable anti-corruption laws. In particular, they ensure that their associates, subcontractors or representatives do not offer, promise or grant advantages to employees of Brakes India with the purpose of obtaining a contract or other preferential treatment in the course of business. These principles also apply where our suppliers cooperate with other third parties in connection with the activity for Brakes India Pvt Ltd.

Donations and Sponsoring
In the allocation of donations, business partners follow the principle of altruistic action. Their donations are solely voluntary and in accordance with the applicable legislation. Business partners sponsor individuals, groups, or organizations without any intention of gaining unfair business advantages.

Trade secrets
Our business partners ensure that confidential information from Brakes India is kept confidential. This also applies upon termination of the business relationship. Examples of confidential information include drawings, standards, pricing information, manufacturing methods, financial data and sales plans.
Money laundering
Our business partners observe the legal provisions to prevent money laundering.

Brakes India expects its business partners to report indications of possible criminal offenses, wrongdoings, and special risks that could impact BIPL. To be reported to Head SDI.

COMPLIANCE WITH THE CODE OF CONDUCT

Our suppliers must communicate this Code of Conduct to suppliers/sub suppliers they engage to fulfil their contractual obligations towards Brakes India, take the principles of the Code of Conduct into consideration when selecting such third parties and endeavour to ensure such third parties compliance with the Code of Conduct.

Brakes India reserves the right to verify supplier's compliance with the principles of this Code of Conduct by means of an audit with prior intimation.

Violation of this Code of Conduct constitutes a deterioration of the business relationship between Brakes India and the supplier. In this event we shall have the right to demand clarification of the facts and initiation of countermeasures by the supplier. In case the supplier fails to provide evidence within a reasonable period of time that appropriate measures for improvement have been initiated, or in case the violation is so serious that continuation of the business relationship is unacceptable for Brakes India, we reserve the right to terminate the contractual relationship concerned.