

	<p>DEPARTMENT MANUAL MANUAL NO. : DM-HRD-10 DOCUMENT LEVEL : 2 DEPT. / SECTION: HRD</p>	<p>CHAPTER : DM-HRD-10-08 DOC-HRD-01 REV : 02 DATE : 01.10.2025 Page 1 of 12</p>
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1. Code of Conduct Policy

Purpose:

This Code of Conduct defines the ethical standards, behavioural expectations, and compliance requirements for all employees and representatives of the Company engaged in forging, heat treatment, machining, finishing, inspection, and allied activities.

The objective is to ensure safe operations, ethical business practices, product quality, and legal compliance.

Applicability:

This policy applies to:

- Permanent, temporary, contractual, apprentice, and trainee employees
- Shop-floor workers, supervisors, engineers, and managers
- Directors and senior management
- Contractors, job workers, and suppliers working on Company premises

Principal:

- Safety First – No job is more important than safety
- Integrity – Honest and ethical conduct in all activities
- Quality Excellence – Zero tolerance for intentional quality deviations
- Respect – Dignity and fairness for all employees
- Compliance – Adherence to laws, standards, and customer requirements

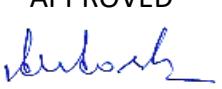
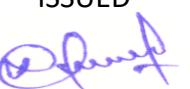
Workplace Safety and Health:

Based on company's operations / nature of work we need to ensure that

- Safety procedures, SOPs, and work instructions must be strictly followed
- PPE (helmets, gloves, safety shoes, ear plugs, goggles, etc.) must be worn as required
- Machine guards, interlocks, and emergency systems must not be bypassed
- Alcohol, drugs, or intoxication at the workplace are strictly prohibited
- All accidents, near misses, and unsafe conditions must be reported immediately

We believe in and follow this

- Intentional quality violations will be treated as serious misconduct.
- Employees must Conduct all business dealings honestly and transparently
- Employees must Avoid fraud, misrepresentation, or manipulation also protect customer trust and company reputations.
- Bribery, kickbacks, facilitation payments, or improper advantages are prohibited in the company.
- Don't accept the Gifts or hospitality from suppliers or customers.
- Corruption: Abuse of entrusted power for private gain.
- Bribery: Offering, giving, receiving, or soliciting anything of value to influence a business decision.
- Facilitation Payments: Small unofficial payments to expedite routine actions (strictly prohibited).
- Conflict of Interest: Personal interests interfering with official duties.

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- Anti- Money Laundering: Concealing or disguising the origin of illegally obtained funds to make them appear legitimate.
- Any demand or offer of bribes must be reported immediately in Legal / HR Dept.
- Employees must disclose situations where personal, financial, or family interests may conflict with Company interests like Dealings with suppliers or contractors
- The Company maintains a zero-tolerance approach in Discrimination based on gender, caste, religion, age, disability, abuse, threats, or physical or verbal misconduct or any other status
- All employees must treat colleagues, contract workers, and visitors with respect.
- Employees are responsible for safeguarding Machinery, tools, dies, molds, gauges, and fixtures, Company information, software, and documents, raw materials, consumables, and finished goods, Misuse, theft, or damage of assets is strictly prohibited.
- Employees must Protect proprietary manufacturing processes, designs, and customer data, also, Not disclose confidential information without authorization.
- Employee has to protect the company's confidentiality obligations continue even after separation from the Company.
- Employees shall follow waste management, scrap handling, and pollution control procedures also, they have to Prevent oil leaks, excessive emissions, and unsafe disposal of waste.
- Employee has Support energy conservation and sustainable manufacturing practices inside the company.
- Employees are encouraged to report Safety violations, Ethical misconduct, Harassment or discrimination to the concern authority. Reports can be made through the grievance or whistleblower mechanism without fear of retaliation.
- Mobile ring tone should be always in low volume during working hours.
- Mobile ring should be in silent mode while we are in meeting
- Respond immediately the unattended official calls after the meetings. (If possible, send the SMS for why not attending calls).
- Try to lift incoming call of mobile & intercom in 2 or 3 rings. Try to avoid discussions loudly in open office area.
- Respect to seniors and seniors will do the same.
- Attend the official visitors/guests immediately or convey the message when you could meet them.
- Always go with diary while attending the meetings and officially approaching the Seniors/Directors.
- Try to reach in time (Scheduled time) in the meetings (Pl. Convey the message to the convener of the meeting if you are unable to attend the meeting or reach in time).
- We shall be always in our dress code while on duty.

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 <p>ECHJAY INDUSTRIES</p>	<p>DEPARTMENT MANUAL MANUAL NO. : DM-HRD-10 DOCUMENT LEVEL : 2 DEPT. / SECTION: HRD</p>	<p>CHAPTER : DM-HRD-10-08 DOC-HRD-01 REV : 02 DATE : 01.10.2025 Page 3 of 12</p>
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2. Employee life (Human Right) and Working Conditions Policy

Policy Statement:

Echjay is committed to providing safe, healthy, fair, ethical, and respectful working conditions for all employees, subcontractors, and stakeholders. We uphold internationally recognized human rights and ensure responsible workplace practices across our operations and supply chain.

This Policy is guided by:

- United Nations Guiding Principles on Business & Human Rights
- Applicable Indian labour laws and international working-condition standards
- Echjay Code of Business Conduct and relevant internal manuals

Purpose

The purpose of this policy is to:

- Ensure safe, healthy, and humane working conditions
- Protect human rights of all workers
- Promote ethical recruitment, equality, and non-discrimination
- Ensure compliance with labour laws and global best practices
- Establish clear expectations for employees, contractors, and suppliers

Scope

This policy applies to:

- All employees of Echjay (permanent, contractual, trainees, apprentices)
- All subcontractor and contractor employees
- All suppliers and business partners engaged with Echjay

1. Child Labour

- Echjay strictly prohibits employment of individuals below 18 years in hazardous or full-time work.
- No worker shall perform tasks that compromise education, health, or development.

2. Forced Labour & Anti-Slavery Practices

- Forced, bonded, trafficked, or involuntary labour
- Confiscation or withholding of identity documents
- Supply-chain risk assessments
- Trainings on modern slavery
- Whistle-blowing mechanisms
- Audits of high-risk suppliers

3. Working Hours, Compensation & Benefits

- Working hours will comply with applicable labour laws.
- Employees are entitled to breaks, weekly off, and statutory leaves.
- Overtime must be voluntary and compensated according to legal norms.

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- Overtime / extra working will be paid as per the rule but company can't pressure the employees to work daily extra hours. It should be bound on as per factory act. Quarterly overtime should not be increase more than 125 hours.
- All employees must receive legally mandated benefits including:
- PF, ESIC, Bonus, Gratuity
- Living wage remuneration
- Workers Compensation / Group Accident Policy
- Medical allowance for all employees; goal to cover all employees under Group Mediclaim by 2030.
- Proper canteen facilities shall be provided.
- Periodic medical camps will be conducted for health monitoring
- Employee can take 2 hours short leave to maintain their family / friend and social work life balance.
- In case of illness of family members, company will give extra benefit for leave, ESIC facility and the company is also giving flexible working hours and also employee can delegate their work to overcome in the critical condition of family member. In some critical condition of family company will give flexi-leave facility and food tiffin services to hospital as well so, the employee mental stress can be reducing.

4. Workplace Environment

Echjay provides a safe, clean, hygienic, and well-maintained workplace:

- Adequate washrooms, drinking water, lighting, and ventilation
- Daily housekeeping checklist and twice-a-week housekeeping audits
- Monthly monitoring of exhaust systems, lighting, and noise levels by third-party auditors
- Ergonomically designed workspaces with sufficient working area

5. Health, Safety & Emergency Preparedness

Echjay is committed to a safe and healthy workplace:

- Compliance with ISO 14001 & ISO 45001 standards
- Annual Management Review with timely closure of action points
- Mandatory use of PPE; no work without required PPE
- Regular maintenance and safeguarding of machinery
- Strict investigation and action for all near-miss incidents
- Monthly internal safety audits
- 24x7 Occupational Health Center (OHC) facility
- Well-maintained emergency exits, alarms, firefighting equipment
- Mandatory safety training for employees and subcontractors
- Periodic fire and evacuation mock drills

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6. Diversity, Equity & Inclusion

- Echjay promotes respect, equal opportunity, and an inclusive culture.
- We support women, minority groups, persons with disabilities, and veteran-owned businesses.

7. Freedom of Association & Collective Bargaining (Company Trade Union)

- All Employees have the right to join trade unions.
- Echjay will not interfere with lawful collective bargaining activities. All employees are covered in the trade union. Employees are having right to discuss their issue as per describe the trade union process/ cycle no one can direct deal with top management without discussion with union president and vice president. 74% employees are already covered in the union only 26% employees still pending to cover in the year till 2028.

8. Anti-Discrimination & Harassment-Free Workplace

Echjay prohibits discrimination based on:

- Gender, caste, religion, age, disability, ethnicity, sexual orientation, or any protected characteristic
- Equal opportunity in hiring, promotion, and development based on merits employees promoted.
- A workplace free from verbal, physical, sexual, or psychological harassment
- Confidential grievance channels and POSH compliance

9. Diversity, Equity & Inclusion

- Echjay promotes respect, equal opportunity, and an inclusive culture.
- We support women, minority groups, persons with disabilities, and veteran-owned businesses in the next 3 years Echjay will increase the woman workers.

10. Ethical Recruitment

- Transparent and fair hiring
- Clear job descriptions and terms of employment
- No recruitment-related discrimination
- Worker welfare throughout the hiring process

11. Women's Rights and Safety

- Compliance with maternity laws and gender equality provisions
- Safe transportation for women employees working early or late hours
- Equal pay and equal access to opportunities
- Rights of Minorities & Indigenous Communities
- Cultural, linguistic, and spiritual practices

12. Career Management and Training to the employees for their development.

- Career Development policy statement.
- Under this policy, Department Heads will be responsible for:

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- Identifying the key management positions in the department for which career planning programs will be developed;
- Obtaining approval of Manager for positions so identified, and approval of the Top Management if applicable;
- Hiring employees who are capable of assuming the positions so identified;
- Working with these employees and helping them develop by creating and following formal career planning programs.
- Reviewing career plans with their manager/ HODs.

Procedures:

- The department head will identify the key management positions in the department for which long term career planning programs will be developed.
- The department head will work with employees in these positions to help them acquire the necessary job-related education, training, and work experience by developing a career plan for them.
- As these key management positions become vacant, the department head will hire employees with management potential to fill the positions.
- The agency head may, once a career plan is approved by the Manager, "underfill" a key management position (i.e., select an applicant who may not have as many years' experience as another applicant) to allow development of the individual through assumption of the duties of the position in increments (as a learning process). The career plan document must include steps, time frames, and the incumbent must achieve in order to progress to the targeted management position.
- The Human Resources Department will draft a temporary class specification for the underfilled job identifying it as a development classification. A copy of the career plan document and any incremental pay increases approved by the agency head as provided in the career planning document will become of part of the employee's personnel file.

Techniques that could be used to increase an employee's knowledge/skill level for their better career

- Encouraging affiliation with professional associations.
- Encouraging/requiring involvement in self-development activities such as:
- Attending job-related seminars
- Reading management literature (books, journals, magazines)
- Attending career planning and development workshops
- Using self-assessment tools to determine potential, evaluate aptitude, or identify strengths and areas in need of improvement (e.g., surveys on management style, skills inventories, aptitude tests)
- Pursuing job-related interests outside of work (e.g., enrolling in an advanced degree management program, teaching management courses at a community college, volunteering to serve on business school partnership committees)

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- Job rotations (involve shifting or transferring managers among jobs so that they are exposed to and learn new responsibilities).
- Committee assignments and task force memberships (expose promising employees to a wide range of organizational processes, issues, and problems; broaden knowledge).
- If the employee needs additional outside education or training to qualify for a higher-level position, the department head will advise him/her of an appropriate academic program and the county's tuition assistance program.
- After the career plan is developed, department heads under the direction of the Top Management will review developed career plans with their manager and HR Dept.
- The department head will be responsible for tracking the employee's progress and providing guidance as necessary.
- If the employee fails to complete the development plan on schedule and as described, or if his/her personal career plans change, the employee would revert back to the position in which he/she has permanent status.
- Echjay ensure that next 5 years they will 100% employee covered in Human rights by 2030.

13. External stakeholder Human Rights – Suppliers, Contractors, Customers and Clients

- Comply with the Company's Human Rights Policy and Code of Conduct
- Ensure no child labour, forced labour, or human trafficking in their operations
- Provide fair wages, safe working conditions, and legal working hours
- Allow audits, inspections, and corrective action plans
- Cascade human rights expectations to their subcontractors
- Encourage responsible and ethical business practices
- Support compliance with human rights standards through responsible sourcing
- Collaborate on corrective actions when human rights risks are identified

14. Performance Reviews

- Performance reviews allow each employee an opportunity to note major accomplishments and progress as well as performance concerns and areas for improvement.
- The employee's performance will be evaluated by Department HODs in the following interval: every one year.
- The performance evaluations may vary depending upon the period of service, designation, priority, etc.
- Factor considered in the performance review includes quality of your job performance, your attendance, meeting the requirements of your job description, Production Target vs Achievements, warning letters given by HR team, compliance with the Company policies, etc.

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3. Business Ethics Policy

Policy Subject:

This CODE OF ETHICS AND BUSINESS CONDUCT of the Echjay Industries Pvt. Ltd. serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, Echjay are committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for the Echjay Industries Pvt. Ltd. (including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor or consultant staff), and also include other organisations who do business with us.

Echjay Industries Pvt. Ltd. expects its staff to be impartial and honest in all affairs relating to their job. All staff bear a responsibility in general, to be of good faith and do nothing to destroy the trust necessary for employment.

The success of our business is based on the trust we earn from our employees, customers. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.

Echjay Industries Pvt. Ltd is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith.

Managers and leaders has higher responsibility for demonstrating, also through their actions, the importance of this Code. Managers and leaders are responsible for promptly addressing every raised ethical question or concern. Employees must cooperate in investigations of potential or alleged misconduct.

Non-compliance to this Code considered as a misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.

Our Core Values are:

- CUSTOMER FIRST
- ETHICAL AND TRANSPARENT BUSINESS PRACTICES.
- QUALITY AS A WAY OF LIFE
- ADDRESSING ENERGY CONSERVATION & CONCERNS IN ENVIRONMENT & SOCIAL WELFARE
- ENCOURAGE EMPOWERED TEAM WORKING

Ethical Decision-making

Ethical conduct is a value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal.

Sustainability: People + Profit + Planet:

We are committed to meet current requirements without compromising the needs of future generations. To this, we combine economic, environmental and social factors in our operation and our business decisions.

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Compliance with laws and regulations:

Our commitment to integrity begins with complying with laws, rules and regulations. We understand and comply with the legal requirements and commercial practices of lawful business. We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights. Our staff must follow applicable laws and regulations, including the Code at all times and must ensure compliant operation.

Human rights:

We are committed to respect human dignity and rights of each individual and community whom we interact with during the course of work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.

Intellectual Property:

We, Echjay industries are having the policy statement on intellectual property. We have protected by a patent, copyright, trademark, or trade secret. Trademarks protect a word, phrase, sign, symbol, shape, or label that is a distinctive identifier of the goods or services of the creator when placed in the market that is used to distinguish goods or services from those of any other person or business for an indefinite term. The work is covered under the Intellectual Property (IP). Intellectual property protection is important to prevent counterfeiting and profit laws from infringement.

Export controls & economic sanction:

Echjay will respect the restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

Fair labour practices and working conditions:

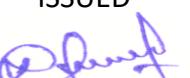
We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws. We are firmly opposed to employ or contract child or slave labour or any form of forced or compulsory or bonded labour. We condemn all forms of illegal, unfair, unethical labour practice that exploits workforce, destroys social security or serves as tax evasion, including but not limited to undeclared and "grey" work or holding back wages. Our staff shall act with integrity and treat their colleagues and others through the work with full respect.

Financial Responsibility:

Suppliers commit to a company's responsibility to accurately record, maintain and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports and submissions to customers or regulatory authorities, when appropriate. Books and records are expected to be maintained in accordance with applicable law and generally accepted accounting principles.

Anti-Fraud:

Fraud – the act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g., submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited. **The Echjay give assurance that**

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they have given training on fraud and cover 65% emp. Also, next 5 years they will give this training to all 100% employee.

Fair competition and business conduct:

Our relationships with business partners are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to comply with all applicable trade controls, restrictions, sanctions and import-export embargos.

We do not allow any violence of the fairness of any tendering process in any way. We refrain from damaging competition and the reputation of any business partners and any behaviour that harms competitor's creditability.

We do not hold back maliciously, unlawfully or unduly payments towards our partners, and we do not allow such practices in our supply chain, we fight the unethical practice of "debt chain".

Our staff is responsible for ensuring fair business during their job and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

Security, protection and proper use of company assets:

We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment and information are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not affect job performance or disrupts workplace morale.

All staff is obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

Confidentiality, information security, proprietary information and intellectual property:

We Echjay industries are believing the data security that's why we have taken **TISAX certification from External body**. We are committed to business information confidentiality, integrity and accessibility, we implement proper technical security measures this and it is our staff's obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All information like collection, processing, third party data storage should be kept in top security. All staff must handle any such information as secret. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed all times.

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

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**Our TISAX certification we have covered 80% IT security risk assessment till 2025 and it valid till 2028.
Till 2028 we will 100% comply the policy.**

Conflict of Interests:

Echjay requires that employees of its suppliers avoid any conflict between their own interests and the interests of their company in dealing with suppliers, customers and other third parties. It is also a conflict of interest for an employee during or subsequent to employment and without proper authority to give or make available to anyone or use for his/her own benefit information of a confidential nature derived from his/her employment.

We ensure that all business decisions are made in the best interest of the organization and are free from any undue influence arising from personal, financial, or other external interests. The organization is committed to integrity, transparency, and ethical conduct in all its operations

Conflict policy is based on below principles:

- Acting with honesty, fairness, and impartiality
- Disclosing conflicts promptly and transparently
- Managing conflicts effectively to prevent harm to the organization
- Ensuring no retaliation against individuals who disclose conflicts in good faith

Qualitative Targets and Commitments:

- Employees demonstrate awareness and confidence in identifying and reporting conflicts without fear.
- Stakeholders perceive organizational decisions as fair, unbiased, and transparent.
- Ensure leaders model ethical behavior and compliance
- All business decisions reflect merit, objectivity, and organizational interest.
- Conflict management processes evolve based on lessons learned and stakeholder feedback.

Quantitative Targets for Conflict of Interest Management:

Indicator	Quantitative Target
New joiners submitting COI declaration within 30 days	>90 %
Timely disclosure of newly identified conflicts	100% within 7 working days
COI cases identified through self-disclosure	>90 %
Average time to resolve COI cases	< 30 days
Employees receiving COI training annually	>80%
COI cases reported to the Board/Audit Committee	100% of high-risk cases
COI compliance checks conducted	At least 1 per year
Disciplinary actions implemented within timeline	>80%

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Counterfeit Parts:

Echjay will fulfill the requirement for companies to develop, implement and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Business partners are also expected to establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials and notify the Original Equipment Manufacturer (OEM) customer and/or law enforcement as appropriate. Finally, companies are expected to confirm that any sales to non-OEM customers are compliant with local laws and those products sold will be used in a lawful manner.

Privacy, personal data protection:

We respect people's privacy and we acknowledge customers, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.

Fair Competition and Antitrust Law:

Echjay expects all those involved in the business process to submit to the regulations of antitrust law and international agreements on fair competition.

Discloser of Information:

Echjay is responsible for to disclose the financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, when applicable, disclose information regarding labour force, health and safety practices, environmental practices, business activities, financial situation and performance.

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