

# SUPPLIER CODE OF CONDUCT

The Elica PB India Private Limited (Elica PB) Supplier Code of Conduct (“Code”) formalizes the key principles under which suppliers to Elica PB India Private Limited are required to operate.

In selecting suppliers, Elica PB works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of Elica PB.

This Code formalizes Elica PB’s practices and makes clear that, recognizing differences in cultures and legal requirements, we expect that wherever our suppliers are located, producing products for us, producing components that we use in our products, and wherever services are performed for us (collectively “Suppliers”), that they are produced and/or provided in a manner compatible with the high standards that contribute to the outstanding reputation of Elica PB and our brands. Suppliers are required to comply with this Code and to have and maintain practices similar to those in Elica PB’s Code of Ethics (available at [www.elicaindia.com](http://www.elicaindia.com)).

This Code applies to all Suppliers of Elica PB including every facility of a Supplier.

Elica PB strongly encourages Suppliers to exceed the requirements of this Code and promote best practices and continuous improvement throughout their operations and those of their suppliers, service providers, and extended networks. If there is a conflict between applicable laws and this Code, or there is no

local legal requirement, the stricter standard shall apply if it does not violate local law. A Supplier must contact Elica PB to discuss any inconsistency between a Code requirement and applicable local law.

## **Laws and Regulations**

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate and also in full compliance with this Code.

## **Corruption**

Bribery, extortion and kickbacks are prohibited. Suppliers must comply with all applicable anti-bribery and anticorruption laws including the U.S. Foreign Corrupt Practices Act (“FCPA”), which prohibits bribery of foreign government officials (including employees of state-owned enterprises). Improper payments by Suppliers can create FCPA liability for Elica PB and Suppliers.

## **Child Labor**

Suppliers must comply with local laws regarding the minimum age of employees. The minimum age for workers must be the greater of: (a) 15 years of age or 14 years of age where local law allows such an employment age consistent with International Labor Organization guidelines; or (b) the age for completing mandatory (compulsorily) education; or (c) the minimum age established by law in the country of manufacture.

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In addition, Suppliers must comply with all legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, safety, working conditions, and the handling of certain materials.

## **Forced Labor**

Suppliers must not use any type of involuntary or forced labor, including indentured, bonded, prison, slave or human trafficked labor.

## **Harassment**

Suppliers must treat all workers with respect and dignity. No work shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Suppliers will not use monetary fines as a disciplinary practice.

## **Wage and Benefits**

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. In addition, Suppliers must provide accident insurance to their workers for work-related accidents and compensation for work-related accidents resulting in permanent disability.

## **Hours of Work**

Suppliers must ensure that on a regularly scheduled basis, except in extraordinary business circumstances, workers are not required to work more than (a) 60 hours a week, including overtime, or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture. In addition, except in extraordinary business circumstances, all workers are entitled to at least one day off in every seven day period.

## **Health and Safety**

Suppliers must provide workers a clean, safe and healthy work environment in compliance with all legally mandated standards for workplace health and safety in the countries in which they operate. This includes any residential facilities a Supplier provides to its workers.

## **Nondiscrimination**

Suppliers must ensure employment – including hiring, payment, benefits, advancement, termination and retirement – is based on ability and not on beliefs or any other personal characteristics such as color, race, caste, religion, age, maturity, nationality, social or ethnic origin, status, sexual orientation, gender, gender identity or expression, HIV, marital status, pregnancy, political affiliation, military service (Veterans), union membership, disability or any other status or characteristic that is not related to the individual's merit or the inherent requirements of the job.

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## **Women’s Rights**

Suppliers will ensure women workers receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment and pregnancy testing – to the extent provided – will be voluntary and the option of the worker. In addition, workers will not be forced to use contraception.

## **Freedom of Association and Collective Bargaining**

Suppliers must recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers also must respect any legal right of workers to bargain collectively.

## **Environment**

Suppliers must comply with all local environmental laws applicable to the workplace, the products produced, and the methods of manufacture. Additionally, Suppliers must not use materials that are considered harmful to the environment, but should encourage the use of processes and materials that support sustainability of the environment.

## **Subcontracting**

Suppliers must not use subcontractors to manufacture Elica PB products or product components that contain “Elica” or Elica PB trademarks or tradenames without prior approval from Elica PB, and only after the subcontractor has agreed to comply with this

Code. Suppliers must ensure that their suppliers, service providers, and extended networks have ethical and business practices that are similar to Elica PB’s practices.

## **Communication**

Suppliers should communicate, through their existing ethical operating standards/practices or through this Code, so that their workers, supervisors and permitted subcontractors are aware of the expectations /requirements detailed in this Code.

## **Monitoring and Compliance**

Elica PB will take affirmative measures, such as announced and unannounced inspections of production facilities, to ensure compliance with this Code. Suppliers must allow employees from Elica PB or its designated representatives full access to facilities, documents, worker records and workers for confidential interviews in compliance with local laws. In certain circumstances, Elica PB may require Suppliers to allow Elica PB customers to accompany Elica PB’s representatives during an audit. Those customers may also require full access to facilities, documents, worker records and workers for confidential interviews in compliance with local laws under the terms of a customer’s code of conduct.

*Suppliers are expected to take necessary corrective actions to promptly remedy any identified noncompliance. Elica PB reserves the right to terminate its business relationship with any Supplier*

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*who is unwilling or unable to comply with this Code when termination is allowed by local laws.*

This Code generally includes standards that are objective, measurable and linked to applicable local laws. However, in certain areas there are terms that may benefit from further explanation.

## **Definitions of Key Terms**

### **Application of the Code of Conduct**

The Code represents Elica PB's core values, which apply to our entire supply network – from raw materials and components through finished goods and service providers. Elica PB takes active steps to communicate its Supplier Code of Conduct to all business partners.

To the extent Elica PB becomes aware – through either internal or external sources of information – of violations of the terms of the Code anywhere along the supply network, Elica PB will actively investigate and follow-up on any identified noncompliance.

### **Hours of Work – Extraordinary Business Circumstances**

Extraordinary Business Circumstances: Circumstances that allow for working more than 60 hours in a single week or working seven days without a day off are limited to the following instances:

- Natural disasters, including but not limited to earthquakes, typhoon, hurricanes and fires, directly affecting a supplier.
- Unforeseeable disruption in production resulting from a natural disaster at a supplier facility (for example, a typhoon disrupts the production at an oil refinery facility that has a direct impact on a resin facility's operation), Bandhs etc called by outfits political or local etc .
- Unforeseeable business events at a facility, including but not limited to peak season machine malfunction.

These exceptions for *Extraordinary Business Circumstances* do **not** provide a basis for exceeding the local laws limiting hours of work – or number of days worked without a day off.

### **Hours of Work – Regularly Scheduled Basis**

Regularly Scheduled Basis: This means that working more than 60 hours in a single week – is limited to the following instances:

- Hours of work exceeding the limits stated in the Supplier Code of Conduct will be considered “regularly scheduled” to the extent that in any 12 week period, more than 25 percent of the total hours worked in any given week are greater than 60 hours.

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- For example, it would be a violation of the Code if, in any 12 week period, the actual hours worked exceed the requirements of the Code for more than three weeks.

The exception provided under *Regularly Scheduled Basis* does **not** provide a basis for exceeding local laws limiting the hours of work or number of days worked without a day off.

## **Health and Safety – A clean, safe and healthy work environment in compliance with all applicable, legally mandated standards.**

Clean, safe and healthy work environment includes all requirements of the applicable local law (for example, the Occupational Safety and Health Act for factories in the United States). The principle areas of focus in this regard will initially be:

- Fire Safety
- Machine Guards
- Personal Protective Equipment
- Lighting, Temperature and Ventilation
- Toilet Facilities

## **Environment – Materials that are considered harmful to the environment and/or are regulated by governmental agencies**

Materials that are regulated by governmental agencies or are considered harmful to the environment, including chemicals, as per applicable regulations should not be used by Elica PB Suppliers.

In addition, regulated minerals known as “3TG” metals – cassiterite/tin, columbite-tantalite/tantalum, wolframite/tungsten and gold (and others determined by the U.S. Secretary of State as financing conflict in the DRC countries); and originating from the Democratic Republic of Congo (DRC) or adjoining countries, need to be disclosed to Elica PB in advance and Supplier must produce documentation tracing the origin of these minerals.

**Subcontracting – Subcontractors in the manufacture or assembly of Elica PB’s products for whom the Supplier Code of Conduct also applies.** Facilities, other than the facility identified for the production of a product for Elica PB, involved in either the final assembly of the product or the manufacture of product components bearing any Elica or Elica PB -owned trademark or logo.