

**RAYCHEM-RPG PRIVATE LIMITED****Trade and Responsible Conduct Policy****POLICY OUTLINING RAYCHEM-RPG'S COMMITMENT TOWARDS TRADE AND RESPONSIBLE BUSINESS CONDUCT**

RRPL\_CPP\_Trade & Business Responsible Conduct

**Effective Date: April 1, 2024**

**PURPOSE:**

Raychem-RPG Private Limited (“**Company**” for brevity) acknowledges its duty to conduct trade operations catering to consumers' infrastructure needs while complying with legal standards, prioritizing safety, and fostering ethical business practices. This policy outlining the Company’s guiding principles towards trade and responsible business conduct (“**Policy**”) extends to all suppliers, contractors, dealers, distributors and channel partners and affiliates of the Company, hereinafter referred to as the "**Raychem-RPG Trade Partners.**"

**COMPLIANCE WITH LAWS AND REGULATIONS:**

**Adherence to Legal Standards:** Raychem-RPG Trade Partners and the Company must each commit to complying with all applicable laws, regulations, and international conventions governing the trade, storage, handling, and transportation of regulated goods.

**Regulatory Compliance:** Raychem-RPG Trade Partners shall ensure strict adherence to national and international regulatory requirements concerning the labelling, packaging, storage, transportation, and disposal of regulated (electrical) materials.

**Legislative Compliance:** The laws required to be followed by Raychem-RPG Trade Partners in this regard, include but is not limited to:

- Legal Metrology Act, 2009 (as amended)
- Legal Metrology (Packaged Commodities) Rules, 2011
- Electronics and Information Technology Goods (Requirement of Compulsory Registration) Order, 2012 (as amended)
- Solar Photovoltaics, Systems, Devices and Components Goods (Requirement for Compulsory Registration) Order, 2017
- The Electrical Wires, Cables, Appliances and Accessories (Quality Control) Order, 1993
- Bureau of Indian Standards Act, 2016
- E-Waste Management Rules, 2022
- Goods and Services Act, 2017 and Rules framed thereunder

**RESPONSIBLE BUSINESS CONDUCT:**

**Ethical Standards:** Raychem-RPG Trade Partners shall conduct themselves at all times with a strong commitment to ethical standards, honesty, transparency, and integrity.

**Health:** Raychem-RPG Trade Partners shall prioritize the health and safety of employees, customers, communities and the environment.

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**Safety:** Raychem-RPG Trade Partners shall take measures to prevent accidents, minimize risks, and provide necessary training for safe handling of electrical and hazardous materials.

**Environmental Responsibility:** Raychem-RPG Trade Partners shall strive to minimize the environmental impact of trade operations involving hazardous materials. Efforts shall be made to reduce emissions, manage waste responsibly, and promote sustainable practices.

**Legislative Compliance:** Raychem-RPG Trade Partners agree to comply with the following laws in their implementation of health, safety and sustainable operations, to the extent it is applicable to their business including but not limited to:

- [State] Shops & Establishment Act and rules framed thereunder
- Maternity Benefit Act, 1961 (as amended)
- Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016
- Chemical Accidents (Emergency Planning, Preparedness, and Response) Rules, 1996
- The Factories Act, 1948
- Occupational Safety, Health, and Working Conditions Code, 2020
- Environment (Protection) Act, 1986
- Energy Conservation (Amendment) Act of 2022

**ADHERENCE TO INTERNATIONAL STANDARDS IN THE CONDUCT OF BUSINESS:**

In the trade of the Company's products and services, aligning with various United Nations protocols is crucial. These protocols encompass a spectrum of guidelines and agreements aimed at fostering sustainable trade practices, including environmental responsibility, fair labour conditions, and ethical business conduct. Adhering to these protocols ensures that the trade remains compliant with international standards, promotes responsible production and consumption, and contributes to global efforts in achieving economic growth while prioritizing social and environmental well-being. Each Raychem-RPG Trade Partner agrees to comply with the following guidelines to maintain the highest standards in industry in the conduct of business and trade:

- UN Convention on the Rights of the Child (CRC) which ensures protection of children's rights, including prohibiting child labor and exploitation.
- International Labour Organization (ILO) Convention No. 138 addressing minimum age for employment.
- UN Guiding Principles on Business and Human Rights which provides a framework for businesses to prevent human rights abuses within its organization.
- UN Global Compact which encourages businesses to adopt sustainable and socially responsible policies covering human rights, labour, environment, and anti-corruption.
- UN Framework Convention on Climate Change (UNFCCC) which urges reduction of greenhouse gas emissions and promoting sustainable development.
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal which provides guidelines to manage the movement and disposal of hazardous waste, including electronic waste (e-waste).
- Stockholm Convention on Persistent Organic Pollutants (POPs) which aims to eliminate or restrict the production and use of persistent organic pollutants, which can impact the environment and human health.

**SANCTION LAWS AND TRADE EMBARGOES**

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Laws and regulations related to economic sanctions, imports, export controls and trade embargoes (“**Trade Compliance Regulations**”) are regulatory measures imposed by various nations to control trade activities, often targeting specific countries, regions or goods for various reasons. Trade Compliance Regulations restrict or entirely prohibit financial transactions, imports, or exports of particular goods.

Within this Policy framework Raychem-RPG Trade Partners are required to assert that they do not engage in any form of trade with the parties or countries identified under the Trade Compliance Regulations issued by India, the United States of America, the European Union, the United Kingdom and Switzerland or any other relevant country to the extent applicable. This stance underscores the requirement for careful evaluation of trade practices. To navigate these intricate frameworks effectively, the Board of Directors<sup>1</sup> within the Company retains the exclusive discretion to periodically assess and designate countries that will be included in the Company's authorized trade network, ensuring alignment with the evolving dynamics of international relations and trade regulations. Raychem-RPG Trade Partners must not engage in any transaction or dealing with or for any party that is associated with or located in

- Belarus
- Crimea, Donetsk, Kherson, Luhansk, Sevastopol, and Zaporizhzhia (regions of Ukraine)
- Cuba
- Iran
- North Korea
- Russia
- Syria

**RISK ASSESSMENT AND MITIGATION:**

**Risk Evaluation:** Raychem-RPG Trade Partners agree to conduct regular (*quarterly and annual*) risk assessments to identify, assess, and mitigate potential risks associated with the trade, storage, or transportation of electrical goods.

**Emergency Preparedness:** Each Raychem-RPG Trade Partner will develop and implement robust emergency response plans to address incidents or accidents involving hazardous materials. Where requested by our Company, the Raychem-RPG Trade Partner shall submit a detailed emergency response plan in vogue in its organization.

**TRADE PARTNER ENGAGEMENT:**

**Screening:** Our Company will engage exclusively with Raychem-RPG Trade Partners who share a dedication to maintaining equivalent safety, environmental, and ethical standards within the industry. Raychem-RPG Trade Partners are expected to comply with any screening procedures established by the Company periodically.

**Training and Education:** Raychem-RPG Trade Partners are required to participate in ongoing education and training initiatives designed to elevate awareness and ensure adherence to safety protocols among employees, suppliers, and collaborators.

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<sup>1</sup> The Board of Directors refers to the duly appointed directors on the board of the Company under the Companies Act, 2013 from time to time.

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**CONTINUOUS IMPROVEMENT:**

**Performance Monitoring:** Raychem-RPG Trade Partners consent to routine monitoring, audits, and evaluations of trade operations to evaluate adherence and pinpoint avenues for enhancement.

**Feedback and Adaptation:** Our Company welcomes feedback from stakeholders to improve trade practices.

**COMPLIANCE:**

Our Company is committed to conducting trade operations with the highest regard for legal compliance, safety, ethical conduct, and environmental responsibility. This Policy serves as a guide for all Trade Partners and stakeholders to uphold these principles in all trade activities. Raychem-RPG Trade Partners must acquaint themselves with this Policy and strictly abide by its principles.

Our Company further pledges to internally adhere to the same guiding principles as outlined in this trade and responsible business conduct Policy. This commitment encompasses strict compliance with applicable laws, a steadfast focus on safety, ethical business practices, and maintaining environmental responsibility across all facets of the organization. Our Company undertakes to actively promote - continuous improvement in processes, employee training and cultivation of an ethical culture that mirrors the standards expected from its Trade Partners. Emphasizing transparency and accountability, our Company undertakes to take guidance from this Policy to debate robust compliance measures, including comprehensive reporting structures and internal committees, thus demonstrating its unwavering dedication to upholding these values throughout its operations.

**REPORTING**

Our Company fully extends its support to transparent and fearless reporting. Any instance of breach of this Policy, whether reported anonymously or otherwise, must be directed to the Compliance Officer/Chief Compliance Officer<sup>2</sup> or an assigned officer responsible for overseeing compliance and ethics within the Company at [legal\\_compliance@raychemrpg.com](mailto:legal_compliance@raychemrpg.com). The Chief Compliance Officer is authorized to initiate inquiries, investigations, and determine disciplinary measures or commence legal actions. Decisions made by the Company through its Compliance Officer will be conclusive.

**Publication History:**

**Original Issue Date: April 1, 2024**

<b>Prepared By</b>	<b>Approved by</b>	<b>Approval Date</b>	<b>Issuance Date</b>
Suchi Agarwal	Compliance Committee of Partners (Members: Rajat Bhargava, Pramod Menon, Henno Groell, Viswanath S)	March 28, 2024	April 1, 2024

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<sup>2</sup> Chief Compliance Officer means an officer appointed in the position of the Compliance Officer by the shareholders of the Company, and who is appointed for overseeing compliance and ethics within the Company.