Steel Strips Wheels Limited

SUPPLIER CODE OF CONDUCT

Document Number: SSWL/PUR/SCOC/01

Classification: Internal

Address:

Steel Strips Wheels Limited

S.C.O. 49-50, Sector 26, Madhya Marg,

Chandigarh-160019, India

CONTROLLED COPY

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

Document Control

Document Name	Supplier Code of Conduct
Document Number	SSWL/PUR/SCOC/01
Effective Date	01.04.2025
Issue No.	01
Revision No.	00
Next Review Date	01.04.2027
Classification	Internal
Custodian Department	Purchase Department
Prepared By	DGM-Purchase
Approved By	GM-Purchase

Revision History

Revision Number	Change Requested By	Approved By	Revision Date	Sections Modified / Summary of Changes

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

1. Preamble and Commitment

Steel Strips Wheels Limited (SSWL) is committed to responsible business conduct and to building a supply chain that operates ethically, respects human rights, protects the environment, and supports safe and lawful working conditions. Suppliers are critical partners in SSWL's ability to deliver quality products and services while meeting regulatory obligations, customer requirements, and stakeholder expectations.

This Supplier Code of Conduct (CoC) sets out

(a) minimum mandatory requirements and

(b) Best-practice expectations for Suppliers.

The CoC is intended to be publicly available and may be incorporated into supplier onboarding terms, purchase orders and contracts. Compliance with the CoC is a condition of doing business with SSWL.

2. Scope and Applicability

This CoC applies to all direct suppliers and service providers, contractors and subcontractors engaged for work at or for SSWL, logistics partners, and any agents or intermediaries acting on behalf of a Supplier in connection with SSWL business. Where relevant, SSWL may extend assessments to sub-tier suppliers for high-risk categories, geographies, or materials.

Suppliers shall communicate applicable requirements of this CoC to their subcontractors and shall take reasonable steps to ensure compliance in the portion of their supply chain supporting SSWL. Where local law and this CoC differ, Suppliers shall meet the more stringent requirement unless prohibited by law.

3. Definitions

For the purpose of this CoC:

- Supplier means any entity that provides goods or services to SSWL (including employees, agents and subcontractors).
- Workers includes permanent, temporary, contract, agency, apprentice/trainee, migrant workers and any other personnel engaged by the Supplier.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

- Child labour means work performed by a person below the minimum legal working age or below 15 years, whichever is higher.
- Forced labour includes bonded labour, trafficking, involuntary labour, and work performed under threat or coercion.
- Business Partner includes agents, consultants, brokers and intermediaries.
- Confidential Information includes all non-public information shared by SSWL or generated in the course of working with SSWL.

4. Supplier Responsibilities and Management Systems

Suppliers shall:

(i) Comply with all applicable laws and this CoC.

(ii) Establish internal policies and procedures commensurate with their risk profile;

(iii) maintain records to demonstrate compliance; and

(iv) Ensure personnel are trained and aware of relevant requirements.

Suppliers shall promptly notify SSWL of any material breach of this CoC, serious incident, investigation by regulators, or significant ESG/compliance risk that could affect SSWL.

SSWL encourages Suppliers to adopt recognised management systems where relevant (e.g., ISO 14001 for environmental management and ISO 45001 for occupational health & safety. These are not mandatory unless contractually required, however, having clear and demonstrable systems strengthens compliance assurance

5. Environment

5.1 Carbon Neutrality

Suppliers shall set time-bound emission reduction goals and renewable energy objectives that are aligned with the Paris Agreement and SSWL's objectives on ESG, and to ensure measures that drives on decarbonization of the entire value chain.

5.2 Energy Use, Renewable Energy and Greenhouse Gas Emissions

Supplier shall implement an energy reduction strategy that includes increasing its use of renewable energy to support SSWL's objectives to reduce greenhouse gas and emissions through the supply chain.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

5.3 Environmental Compliance and Permits

Suppliers shall comply with applicable environmental laws and maintain valid permits/authorizations for air emissions, wastewater discharge, waste handling and disposal, and storage/transport of hazardous substances. Suppliers shall maintain air & water quality, monitoring records and submit statutory filings as and when required.

5.4 Pollution Prevention and Chemical/Hazardous Material Management

Suppliers shall implement controls to prevent pollution and accidental releases. Chemical and hazardous materials must be appropriately labelled, stored, handled and safely disposed in an environmental friendly manner. Spill prevention and response measures, secondary containment and worker training shall be implemented where relevant.

5.5 Waste Management and Resource Efficiency

Suppliers shall manage waste responsibly, including segregation, lawful disposal and controls over hazardous waste. Suppliers are encouraged to pursue resource efficiency initiatives such as reduction of scrap, reuse/recycling, and reduction of packaging impacts in alignment with the SSWL's objective to achieve zero waste to landfill. Where relevant, Suppliers shall maintain waste manifests and vendor authorizations for disposal/recycling.

5.6 Water Stewardship

Suppliers shall monitor water withdrawal and discharge, implement water efficiency practices to reduce fresh water consumption, and ensure treated effluent quality meets legal norms. Suppliers operating in water-stressed regions are encouraged to adopt stronger conservation practices and to prevent adverse impacts on local communities. Suppliers shall ensure necessary arrangements to meet water, sanitation, and hygiene requirements.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

5.7 Climate Responsibility

Suppliers are strongly encouraged to measure energy use and greenhouse gas emissions; implement energy efficiency and reduction initiatives; and support supply chain decarbonisation collaborations when requested.

Under SSWL's current approach, ESG reporting is treated as best practice and may be requested from high-impact suppliers.

6. Social

6.1 Prohibition of Child Labour and Protection of Young Workers

Suppliers shall not employ child labour. Suppliers must verify age through reliable documentation as permitted by law. Where young workers are legally employed, Suppliers must ensure work does not interfere with schooling; working hours comply with youth labour protections; and young workers are not assigned hazardous tasks.

Remediation: If child labour is identified, Suppliers must implement a remediation plan prioritising the child's wellbeing and continued education, and must cooperate with SSWL's remediation expectations.

6.2 Prohibition of Forced Labour, Bonded Labour and Human Trafficking

Suppliers shall ensure all work is voluntary. Suppliers must not retain identity documents, require deposits, charge recruitment fees to workers, restrict freedom of movement, or use threats/coercion. Workers must receive clear terms of employment in a language they understand. Recruitment shall be ethical and transparent.

6.3 Freedom of Association and Collective Bargaining

Suppliers shall respect workers' lawful rights to freedom of association and collective bargaining. Where legal restrictions exist, Suppliers must provide lawful means for worker representation and dialogue and must not interfere with or retaliate against worker representatives.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

6.4 Non-Discrimination, Dignity and Respect

Suppliers shall provide a workplace free from discrimination, harassment and abuse. Employment decisions shall be based on merit and job requirements. Physical, sexual, verbal or psychological harassment or intimidation is prohibited. Suppliers shall implement complaint handling procedures and awareness training.

6.5 Wages, Benefits and Working Hours

Suppliers shall comply with wage laws, provide statutory benefits, and ensure working hours, overtime and rest periods are lawful. Wages must be paid on time, documented, and workers shall receive understandable pay slips. Deductions must be lawful and transparent.

6.6 Occupational Health and Safety

Suppliers shall provide safe and healthy working conditions. At minimum, Suppliers shall: identify hazards and assess risks; implement safe operating procedures; provide appropriate PPE and training; ensure machine guarding and electrical safety; maintain emergency preparedness (fire safety, first aid, evacuation); report and investigate incidents; and provide access to potable water and sanitary facilities.

For on-site work at SSWL locations, Suppliers must comply with SSWL's EHS rules, Permit to Work Systems and site instructions.

7. Governance

7.1 Anti-Bribery, Anti-Corruption and Improper Payments

SSWL maintains zero tolerance for bribery and corruption. Suppliers shall not directly or indirectly offer, promise, authorize, give, solicit or accept any bribe, kickback, facilitation payment or improper advantage in connection with SSWL business. This includes improper benefits to public officials (including customs, inspectors and regulators), as well as corrupt payments made through third parties (agents, consultants or subcontractors).

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

Suppliers shall maintain adequate controls including due diligence and oversight of intermediaries, approvals for gifts and hospitality, segregation of duties, transparent accounting, and accurate books and records. Any suspected corruption related to SSWL business must be reported promptly.

7.2 Conflicts of Interest

Suppliers shall avoid situations where personal, financial or other interests conflict—or appear to conflict—with their obligations to act fairly and transparently with SSWL. Suppliers must disclose any actual or potential conflict, including ownership or financial interests involving SSWL employees (or close relatives), personal relationships that may influence procurement decisions, or any arrangement that could compromise impartiality.

7.3 Fair Competition and Anti-Trust

Suppliers shall comply with applicable competition laws and shall not engage in bid rigging, collusion, price-fixing, market allocation, or the inappropriate exchange of confidential competitor information. Suppliers shall compete fairly and independently.

7.4 Gifts, Hospitality and Business Courtesy

Suppliers shall ensure that any gifts or hospitality are lawful, reasonable, infrequent and transparent and are not intended to influence business decisions. Cash gifts or equivalents (gift cards, vouchers) are prohibited where they could influence or appear to influence decisions. Suppliers must comply with SSWL's policy expectations communicated during onboarding.

7.5 Sanctions, Trade Compliance and Anti-Money Laundering

Suppliers shall comply with applicable import/export controls, customs requirements, sanctions and anti-money laundering obligations. Suppliers must maintain records to demonstrate lawful trade and shall not use SSWL transactions to facilitate money laundering or unlawful financial flows.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

7.6 Data Protection, Confidentiality and Intellectual Property

Suppliers must protect SSWL's Confidential Information and any personal data processed in connection with SSWL business. Suppliers shall implement reasonable cybersecurity controls, access restrictions and incident response procedures. Any data breach affecting SSWL data must be notified promptly with details of impact and corrective actions. Suppliers shall respect intellectual property rights and shall not use SSWL branding or confidential designs without written authorization.

7.7 Speak-Up, Grievance and Non-Retaliation

Suppliers shall maintain accessible grievance channels for workers and stakeholders and shall prohibit retaliation against individuals who raise concerns in good faith. Suppliers must cooperate with SSWL investigations where issues relate to SSWL business or supply chain. Where appropriate, Suppliers may also report concerns through SSWL's grievance/ethics channels communicated during onboarding.

8. Responsible Purchasing and Supply Chain Due Diligence

8.1 Responsible Sourcing and Subcontracting Controls

Suppliers must ensure that goods and services supplied to SSWL are produced and delivered in compliance with this CoC. Suppliers shall not subcontract SSWL work to third parties without appropriate authorisation where such authorisation is required under contract or SSWL onboarding conditions.

8.2 Risk-Based Supplier Management and Assessments

SSWL may apply risk-based supplier management considering category risk, geography risk, spend and criticality, ESG/compliance exposure and prior performance. Suppliers may be requested to participate in assessments, provide evidence documents, complete Self-Assessment questionnaires (SAQ) and/or implement improvement actions aligned with EcoVadis themes.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

8.3 Responsible Minerals and Materials

Where relevant to supplied materials, Suppliers are encouraged to conduct due diligence to avoid sourcing from conflict-affected metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.) & conflict minerals (3TGs,) and alloy inputs with traceability concerns and high-risk areas and to prevent human rights abuses in upstream extraction and processing. Suppliers shall maintain traceability information and provide supporting documentation when requested.

8.4 Audit Rights, Information Requests and Cooperation

To verify compliance, Suppliers must cooperate with reasonable requests from SSWL, including document reviews, management interviews and site audits (announced and, in specific cases, unannounced where legally permissible). SSWL may conduct audits via Supplier Assessment Questionnaire directly or through third parties. Suppliers must provide accurate information and must not obstruct audits or retaliate against workers participating in audits.

8.5 Corrective Actions, Remediation and Continuous Improvement

If non-compliance is identified, Suppliers must conduct root-cause analysis; implement corrective actions within agreed timelines; and provide evidence of closure. For serious human rights issues (e.g., child labour, forced labour), remediation must prioritise protection of affected individuals, not only termination of employment.

Suppliers are encouraged to train relevant personnel on ethics/anti-corruption, EHS, labour practices, grievance handling and environmental compliance, and to continually improve performance over time.

8.6 Consequences of Non-Compliance

Depending on severity and recurrence, SSWL may take actions including issuance of corrective action plans, suspension of new business, removal from approved supplier lists, termination of contracts and/or reporting to authorities where required by law.

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.

9. Product Integrity, Quality and Legal Compliance

Suppliers must comply with applicable product quality, safety and regulatory requirements relevant to the goods and services provided to SSWL. Suppliers shall not deliver counterfeit materials, falsified certificates, or non-conforming goods. Where applicable, Suppliers must maintain inspection/test records and ensure traceability consistent with contractual and statutory requirements.

10. Communication, Reporting and Queries

Suppliers may seek clarification on this CoC or report concerns through SSWL Procurement and/or Compliance contact points communicated during onboarding. Suppliers must ensure that internal reporting channels exist and that no retaliation occurs for raising concerns in good faith. SSWL will review reported concerns and may request additional information or remediation actions.

Annexure A — Supplier Acknowledgement Template

We, [Supplier Name], acknowledge that we have read and understood SSWL's Supplier Code of Conduct. We commit to comply with the Code of Conduct and applicable laws, to maintain adequate controls and records, and to cooperate with assessments and audits as required. We will promptly notify SSWL of any material breach or significant risk relevant to SSWL.

Authorized Signatory Name: _____

Designation: _____

Signature (with Company Stamp): _____

Date: ____ / ____ / _____ Place: _____

Prepared By:	**Approved By:**
DGM-Purchase	GM-Purchase

STEEL STRIPS WHEELS LTD. Chandigarh

CONTROLLED COPY

** End of Document**

Attention: The information is intended for the internal use of "Steel Strips Wheels Limited". By viewing this document, you agree to keep the contents in confidence and not copy, disclose, or distribute this without written request to and written confirmation from " Steel Strips Wheels Limited ". If you are not the intended recipient, be aware that any disclosure, copying, or distribution of the contents of this document is prohibited.