

Responsible Sourcing & Business Partner Code

Naseem Bukhari Pvt. Limited

Effective Date: 01-Jul-2024

1. Introduction

At **Naseem Bukhari Pvt. Limited**, responsible sourcing and ethical partnerships are central to our mission to drive a sustainable global energy transition. This Code outlines our expectations for sourcing practices and partner conduct across all our business relationships.

Our responsibility spans beyond price and logistics — we seek to ensure that the origin of every material and every transaction supports integrity, traceability, and sustainability.

2. Scope

This Code applies to all:

- Material and component suppliers;
- Logistics and trade partners;
- Commodity and finance intermediaries;
- Technology and service vendors;
- Long-term offtake, tolling and representation partners.

Partners are expected to comply with these requirements and cascade them through their own operations and supply chains.

3. Ethical Sourcing Principles

3.1 Human Rights and Labor Standards

- Uphold freedom of association, living wages, and workplace safety;
- Prohibit child labor, forced labor, or harassment;
- Respect land, water, and indigenous rights in sourcing regions.

3.2 Environmental Sustainability

- Minimize environmental footprint through emissions reduction, water management, and biodiversity conservation;
- Disclose environmental metrics, including carbon and waste data;
- Support material circularity and climate resilience.

3.3 Conflict-Free and Traceable Supply Chains

- Avoid materials from conflict zones or illicit operations;
 - Ensure full traceability to mine or manufacturing source;
 - Participate in due diligence programs aligned with OECD, IRMA, or RMI frameworks.
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4. Legal and Regulatory Compliance

Partners must comply with:

- National and international trade, labor, and environmental laws;

- Sanctions, customs, and export control regimes;
 - Applicable conflict minerals regulations;
 - Anti-bribery, anti-money laundering, and financial crime laws.
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5. Due Diligence Expectations

In certain situations and for high-risk commodities, we may require:

- Country-of-origin identification;
- Disclosure of mines, smelters, refiners, and sub-suppliers;
- Internal policies on risk screening, ESG, and grievance handling.

Due diligence documentation may be requested at any stage of a commercial relationship.

6. Partner Integrity and Ethics

Partners are expected to:

- Operate transparently and truthfully;
 - Implement anti-corruption programs and whistleblower channels;
 - Avoid conflicts of interest and disclose any financial or political exposure relevant to the partnership.
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7. Monitoring, Auditing, and Improvement

- **Naseem Bukhari Pvt. Limited** may request self-assessments, audits, or site visits;

- In case of non-compliance, we will work constructively to support corrective actions;
 - In severe or repeated breaches, business relationships may be suspended or terminated.
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8. Commitment to Continuous Collaboration

We view responsible sourcing as a journey. We expect our partners to actively contribute to:

- Capacity building and training in ESG topics;
 - Innovation in sustainable materials and supply chain technologies;
 - Joint planning for resilience and decarbonization.
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9. Acknowledgment

Engagement with **Naseem Bukhari Pvt. Limited** constitutes acceptance of this Code and agreement to its principles. All new and existing suppliers will be asked to acknowledge this Code in writing.

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