

Supplier Code of Conduct

Naseem Bukhari Pvt. Limited

Effective Date: 01-Jul-2024

1. Introduction

Naseem Bukhari Pvt. Limited is dedicated to sourcing, trading, and delivering critical materials and technologies that support the renewable energy transition. Our operations span high-impact sectors such as solar, wind, hydrogen, geothermal, energy storage, and industrial decarbonization. To ensure our supply chains reflect our commitment to ethical conduct, sustainability, and compliance, we have developed this Supplier Code of Conduct.

This Code outlines the minimum standards that our suppliers, vendors, subcontractors, and business associates must adhere to in their dealings with us and throughout their own supply chains. We recognize that strong partnerships require shared values and responsible conduct across all links in the value chain.

2. Scope and Applicability

This Supplier Code of Conduct applies to:

- All entities that supply goods, materials, components, or services to **Naseem Bukhari Pvt. Limited**;
- Subcontractors and business affiliates of our suppliers involved in any part of our value chain;

- Any individual or company acting as an agent, consultant, or intermediary for the purposes of sourcing or delivery on our behalf.

All suppliers are expected to ensure that this Code is communicated to their employees and subcontractors and that it forms an integral part of their business practices.

3. Legal and Regulatory Compliance

Suppliers must comply with all applicable local, national, and international laws and regulations, including those related to:

- Labor rights;
- Environmental protection;
- Trade compliance and export controls;
- Anti-bribery and anti-corruption statutes;
- Health and safety standards;
- Taxation and financial reporting;
- Conflict minerals and critical raw material disclosure.

Suppliers should also be familiar with and uphold international frameworks such as:

- The Universal Declaration of Human Rights;
 - The UN Guiding Principles on Business and Human Rights;
 - The ILO Core Conventions;
 - The OECD Due Diligence Guidance for Responsible Supply Chains.
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4. Ethical Business Practices

Suppliers are expected to uphold high standards of integrity, fairness, and transparency in all business dealings.

4.1 Anti-Bribery and Corruption

- Suppliers must not engage in, condone, or tolerate any form of bribery, corruption, extortion, or embezzlement.
- All payments, including commissions, must be legal, documented, and authorized.
- Gifts, hospitality, or any form of personal advantage offered to employees of **Naseem Bukhari Pvt. Limited** must be modest, lawful, and not intended to influence decision-making.

4.2 Conflict of Interest

Suppliers must avoid situations that could create a conflict of interest with their role in providing goods or services to **Naseem Bukhari Pvt. Limited**. Any actual or perceived conflict must be disclosed without delay.

4.3 Fair Competition

Suppliers must compete fairly and comply with all applicable antitrust and competition laws. Practices such as price fixing, market sharing, or abuse of dominance are strictly prohibited.

5. Human Rights and Labor Standards

5.1 No Child or Forced Labor

Suppliers must not employ individuals below the legal working age or engage in any form of forced, bonded, indentured, or involuntary labor.

5.2 Working Hours and Compensation

Working hours must not exceed legal limits, and all workers must be compensated fairly, including overtime where applicable. Wages must meet or exceed minimum legal requirements.

5.3 Non-Discrimination

Employment decisions must be based on qualifications and merit. Discrimination based on gender, ethnicity, religion, disability, or any other protected characteristic is strictly prohibited.

5.4 Freedom of Association

Suppliers must respect the rights of employees to organize and engage in collective bargaining, in accordance with applicable laws.

6. Health, Safety, and Welfare

Suppliers are responsible for providing a safe and healthy working environment for their employees. This includes:

- Identifying and mitigating health and safety risks;
- Providing appropriate safety training and personal protective equipment (PPE);
- Ensuring access to potable water, sanitation, and emergency exits;

- Investigating and reporting all workplace incidents.
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7. Environmental Stewardship

7.1 Compliance and Resource Efficiency

Suppliers must comply with all relevant environmental laws and aim to minimize their environmental footprint through responsible use of resources.

7.2 Emissions, Waste, and Pollution Control

- Hazardous substances must be properly labeled, stored, and disposed of.
- Air emissions, wastewater, and waste materials must be controlled and treated as required by applicable laws.

7.3 Climate Action and Sustainable Innovation

Naseem Bukhari Pvt. Limited encourages suppliers to actively reduce greenhouse gas emissions and pursue energy-efficient, circular, and low-carbon innovations wherever feasible.

8. Responsible Sourcing and Supply Chain Transparency

Suppliers are expected to:

- Perform due diligence on the origin of raw materials and critical minerals;
- Avoid sourcing from conflict-affected or high-risk areas unless robust traceability and human rights safeguards are in place;

- Maintain accurate and transparent documentation on sourcing and supply chain practices;
 - Provide relevant disclosures to **Naseem Bukhari Pvt. Limited** upon request.
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9. Confidentiality and Data Security

Suppliers must protect confidential business information related to **Naseem Bukhari Pvt. Limited**, its clients, and its partners. Sensitive data must be stored securely and only shared with authorized parties for legitimate business purposes.

10. Monitoring, Assessment, and Continuous Improvement

Naseem Bukhari Pvt. Limited reserves the right to assess supplier compliance through:

- Audits and site visits;
- Self-assessments and questionnaires;
- Independent third-party verification.

Suppliers must take prompt corrective actions to address any identified non-compliance. We expect suppliers to collaborate in continuous improvement initiatives and demonstrate a commitment to responsible business conduct.

11. Enforcement and Consequences of Non-Compliance

Suppliers that fail to meet the standards outlined in this Code may be subject to:

- Requests for corrective action plans;
- Suspension or termination of contracts;
- Disqualification from future business.

Naseem Bukhari Pvt. Limited is committed to working constructively with suppliers to address and resolve compliance challenges. However, violations involving human rights abuses, corruption, or serious legal non-compliance may result in immediate termination of the relationship.

12. Acknowledgment and Commitment

Suppliers are required to acknowledge this Code of Conduct and commit to its principles. A signed copy of the Supplier Code of Conduct must be submitted to **Naseem Bukhari Pvt. Limited** as part of the onboarding and annual compliance processes.

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