

Ascenten Code of Conduct 2017

Public Document

Version 1.0

1 About this Document

This document sets forth the Ascenten Code of Conduct as it applies to itself and its suppliers and establishes methods to report violation of the code and high-level actions upon ascertaining that violation occurred.

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3 Background

Ascenten practices a culture of safety, integrity, record-keeping and compliance in all aspects of its business and expects its management executives and suppliers to adhere to Code of Conduct (the "Code") as described in the following section.

Ascenten reserves the right to visit or have its representatives visit Supplier facility without notice to assess compliance with the Code. If the Supplier is found to be non-compliant with the Code, Ascenten may terminate the Supplier Agreement and in addition, may seek legal action.

If an Ascenten management executive is found to violate the Code, Ascenten may terminate her/his employment and perform a corrective action on its part to comply with the law and ethical business practices which may include a disclosure of the violation and reporting the violation to law enforcement personnel or regulation authorities, and may seek legal action against the employee responsible for the violation.

4 Ascenten Code of Conduct

SECTION 4 AND 5 MUST BE PERMANENTLY DISPLAYED WITH CLEAR VISIBILITY FROM THE OFFICE CHAIRS OF ALL MANAGEMENT EXECUTIVES OF ASCENTEN.

In the following description, “worker” means any employee or subcontractor who works in the same facility as the employee.

- You will comply with all applicable laws and have processes and procedures in place, as required by law, to deter, detect and take corrective action on any unlawful activity at workplace.
- You will treat your workers with dignity and respect.
- You will maintain a workplace free of harassment and discrimination.
- You will not subject your workers to intimidation, exploitation or inhumane treatment.
- You will take necessary measures including effective training, to create a workplace free of sexual harassment, threats, coercion and abuse.
- You will not create unreasonable restrictions on entering or exiting company facilities.
- You will pay your workers at least the minimum wages, benefits and the wages for any overtime work performed, as required by law.
- You will not directly or indirectly, via any third party, engage in human trafficking, child labor, bonded labor or involuntary prison labor.
- You will not confiscate, hide or destroy identity documents belonging to your workers.
- You will provide your workers with a healthy and safe working environment.
- You will train your workers with respect to health and safety aspects before commencing any new work.
- You will take adequate measures to prevent workers from working under influence of alcohol, illegal drugs and non-prescription drugs. You will take adequate measures to prevent workers from working under the influence of prescription medicines that may lead to a health or safety hazard.
- You will provide necessary protective equipment to your workers and establish hazard detection and protection equipment at your workplace as required by law.
- You will establish necessary processes, preventive measures, controls, emergency procedures and drills and comply with all laws with respect to ensuring health and safety of your workers.

- You will provide workers with clean sanitary facilities including clean toilets, clean drinking water and ensure adequate ventilation and adequate personal space at work.
- You will establish processes and systems to manage, investigate, track and implement corrective and preventive measures for work related injuries or sickness.
- You will ensure environmentally compliant manufacturing processes.
- You will maintain and renew environmental permits as required by law.
- You will take necessary precautions including displaying appropriate labels and warnings to identify, store, move, destroy or handle hazardous substances, as required by law.
- You will take necessary measures to reduce or eliminate pollution, waste, wastewater and emissions of pollutants, hazardous substances and environmentally damaging compounds as required by law.
- You will display appropriate labels, directions and warnings with respect to health, safety and emergency processes.
- You will engage in all business practices with utmost integrity.
- You will not engage in, appear to engage in, encourage or appear to encourage any corrupt practice.
- You will not solicit, appear to solicit, offer, appear to offer, deliver or appear to deliver bribes directly or via a third party.
- You will not supply, promote or advertise incorrect information including specifications, features and availability related to your product or services.
- You will take necessary measures to safeguard all intellectual property and confidential information while being stored, processed, transmitted or shared using appropriate physical and electronic means.
- You will take necessary measures to safeguard or destroy personal information about your suppliers, customers, workers, associates and whoever else you do business with, as required by privacy laws.
- You will create, maintain and retain accurate transaction records and documents as required by law, by your Supplier Agreement and by any mandated certification system.
- You will not change records or documents to obscure, cover up, hide or misrepresent the corresponding transactions or information.
- You will take due care with ensuring that your product quality meets or exceeds the applicable standards and contract requirements.

- You will implement a system to suitably update your quality assurance process upon detecting a defect to avoid recurrence of the defect.
- You will deploy a suitable management system to comply with this Code, the Supplier Agreement, customer requirements, all applicable regulations and the law. The management system shall be designed to
 - improve operations and mitigate risks on an ongoing basis by documentation, record maintenance, audits, corrective actions, self-updates, and updates to policies and processes.
 - identify a company representative responsible for ensuring that the management system is put into practice,
 - contain policy statements that establish management's commitment to adhering to the Code,
 - have a process to record, track and impart training to your workers on implementing policies and processes including this Code,
 - have a process to monitor, track and adapt to changes in applicable regulations
 - and have a process to communicate and sensitize your suppliers about this Code.

5 Reporting a Violation

If you discover a violation of this code, please report it by sending sufficient details to CodeViolation@ascenten.net. You may also write to us:

Attn: Compliance Officer,

Ascenten Group

301, 3rd Eye Complex,
Panchvati Cross Roads,
Ahmedabad-380006,
Gujarat, India.

We are committed to ensuring confidentiality of your report within the applicable limits of the law, investigating forward and taking necessary action based on the outcome of the investigation.