



HUMAN RIGHTS AND WORKING CONDITIONS POLICY

Policy No. : MR/MP/31

Rev. No. 00 / 30.08.24

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1. Purpose and Scope

- **Purpose:** To outline our commitment to upholding human rights and ensuring fair, ethical, and legal working conditions across all operations.
- **Scope:** This policy applies to all employees, contractors, suppliers, consultants and business partners in all units where we operate.

2. Policy Statement

SKS is dedicated to respecting human rights and maintaining high standards of working conditions. We are committed to ethical practices and compliance with international standards and local laws.

3. Child Labor and Young Workers

Child & Young Labor: We strictly prohibit the use of child labour. All workers must be above 18 Years age for employment.

4. Wages and Benefits

- **Fair Compensation:** SKS ensures that all employees are paid fair wages that meet or exceed local minimum wage laws and industry standards. Overtime compensation is provided in accordance with legal requirements.
- **Benefits:** Employees receive comprehensive benefits, including health insurance, paid leave, and any other benefits mandated by local laws and industry standards.

5. Working Hours

- **Work Hours:** We adhere to legal limits on working hours and ensure that employees have reasonable working hours and adequate rest periods.
- **Overtime:** Overtime is managed in compliance with legal standards and is compensated appropriately. We take measures to prevent excessive overtime and ensure employees have time off for rest and recovery.

6. Modern Slavery

Prohibition of Modern Slavery: SKS do not tolerate any form of modern slavery, including forced labor, human trafficking, or involuntary servitude. All work must be voluntary, and employees must have the freedom to leave their employment as per contractual and legal terms.



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7. Ethical Recruiting

- **Recruitment Practices:** Our recruitment practices are transparent and fair. We ensure that all recruitment processes are free from coercion, deception, or exploitation and comply with all applicable laws and regulations.

8. Freedom of Association and Collective Bargaining

- **Freedom of Association:** SKS respect employees' rights to freely associate, form, and join unions or other employee organizations without fear of retaliation or discrimination.
- **Collective Bargaining:** SKS support and facilitate the process of collective bargaining and negotiations with representatives of employee organizations to address employment terms and conditions.

9. Non-Discrimination and Harassment

- **Non-Discrimination:** SKS are committed to providing equal employment opportunities and prohibit discrimination based on race, color, gender, sexual orientation, religion, disability, age, or any other protected characteristic.
- **Harassment:** SKS maintain a zero-tolerance policy towards harassment, bullying, and abusive behavior. All employees have the right to work in an environment free from harassment.

10. Women's Rights

- **Equal Opportunity:** SKS ensure that women have equal opportunities for employment, advancement, and remuneration. We are committed to addressing and eliminating gender-based disparities.
- **Supportive Environment:** SKS provide support for women, including maternity leave and accommodations for breastfeeding and parenting, in accordance with legal requirements and best practices.

11. Diversity, Equity, and Inclusion

- **Diversity:** SKS value and promote diversity in our workforce and strive to create an inclusive environment where all individuals are respected and valued.
- **Equity:** SKS are committed to fair treatment and equitable access to opportunities for all employees, addressing systemic inequalities and barriers.
- **Inclusion:** We foster an inclusive culture where diverse perspectives are welcomed and encouraged.



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12. Rights of Minorities and Indigenous Peoples

- **Respect for Rights:** SKS respect the rights of minorities and indigenous peoples, including their cultural, social, and economic rights.
- **Engagement and Consultation:** SKS engage with minority and indigenous communities in a respectful manner and seek to address any concerns related to their rights and interests.

13. Land, Forest, and Water Rights

- **Respect for Land Rights:** SKS respect the rights of communities to land, forest, and water resources. SKS ensure that our operations do not infringe upon or negatively impact these rights.
- **Consultation:** SKS engage in meaningful consultation with affected communities before undertaking projects that impact land, forest, or water resources.

14. Forced Eviction

- **Prohibition of Forced Eviction:** SKS do not engage in or support forced evictions. Any relocation or displacement of communities is conducted in a lawful and respectful manner, with appropriate compensation and support.

15. Use of Private or Public Security Forces

- **Responsible Security Practices:** SKS ensure that any use of private or public security forces is conducted in a lawful and ethical manner. Security forces must respect human rights and operate under strict codes of conduct.
- **Training and Oversight:** SKS provide training for security personnel on human rights standards and monitor their activities to ensure compliance with this policy.

16. Implementation and Compliance

- **Responsibilities:** Management and all HoDs are responsible for enforcing this policy and ensuring compliance within their teams.
- **Training:** Regular training on human rights and working conditions is provided to employees.
- **Reporting:** Clear, confidential reporting channels are available for employees to raise concerns or report violations.
- **Investigation:** All reports of policy violations will be investigated thoroughly, with corrective actions taken as needed.



COMPLIANCE GUIDELINES FOR HEALTH AND SAFETY POLICY

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1. Purpose

The purpose of this compliance guidelines for Health Safety Policy is to establish guidelines and procedures to ensure a safe and healthy work environment. This compliance guidelines aims to protect employees, visitors, and contractors from workplace hazards and to promote a culture of safety within the organization.

2. Scope

This compliance guidelines applies to all employees, contractors, and visitors at all company-operated sites.

3. Personal Protective Equipment (PPE)

- **General Requirements:** Employees must wear appropriate PPE when performing tasks that could pose a risk to their health or safety.
- **Provision and Maintenance:** SKS provides PPE to employees. All PPE must be maintained in good condition, and any damaged or defective equipment must be reported immediately.
- **Training:** Trainings are provided to Employees on the correct use, maintenance, and limitations of PPE.

4. Machine Safety

- **Guarding:** Machines must be equipped with appropriate safety guards to prevent accidental contact with moving parts.
- **Maintenance:** Regular maintenance and inspections are conducted to ensure machines are in safe working order. Maintenance logs are kept and reviewed.
- **Training:** Employees operating machinery are trained on safe operating procedures and emergency shutdown processes.
- **Lockout/Tagout:** Procedures for Lockout/Tagout (LOTO) must be followed to ensure machines are properly shut off and cannot be started up again until maintenance is completed.

5. Emergency Preparedness

- **Emergency Plans:** Comprehensive emergency plans, including evacuation routes, emergency contact information, and procedures for various scenarios (e.g., fire, natural disasters), are developed and communicated.
- **Training and Drills:** Regular emergency drills are conducted to ensure employees are familiar with emergency procedures. Trainings on emergency response are provided frequently.
- **Emergency Equipment:** First aid kits, fire extinguishers, and other emergency equipment are accessible and regularly inspected.



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- **Incident and Accident Management**
- **Reporting:** All incidents and accidents must be reported immediately to a supervisor and documented. Incident reports include a detailed description, causes, and any corrective actions taken.
- **Investigation:** All incidents and accidents are investigated to determine root causes and to prevent recurrence. Findings and recommendations are communicated to all relevant parties.
- **Record Keeping:** Records of all incidents, accidents, and investigations are maintained and reviewed regularly.
- **Workplace Ergonomics**
- **Assessment:** Regular ergonomic assessments are conducted to identify and address potential ergonomic hazards.
- **Adjustments:** Workstations are designed and adjusted to fit the needs of employees, including adjustable chairs, desks, and equipment.
- **Training:** Employees are trained on proper ergonomics practices, including correct posture, lifting techniques, and workstation setup.
- **Handling of Chemical and Biological Substances**
- **Identification and Labeling:** All chemicals and biological substances are properly labelled with safety information. Safety Data Sheets (SDS) are available and accessible to all employees.
- **Storage:** Chemicals and biological substances are stored in accordance with manufacturer guidelines and legal requirements.
- **Training:** Employees handling chemicals and biological substances are trained on proper handling, emergency procedures, and personal protective measures.
- **Spill Response:** Procedures for responding to spills and leaks, including containment, cleanup, and reporting, are established and communicated.
- **Fire Protection**
- **Prevention:** Regular inspections are conducted to ensure fire hazards are identified and mitigated. This includes maintaining clear access to fire exits and ensuring electrical systems are safe.
- **Detection and Suppression:** Smoke detectors, fire alarms, and sprinkler systems are installed and maintained. Fire extinguishers are strategically placed and regularly checked.
- **Training:** Employees are trained in fire prevention, evacuation procedures, and the use of fire extinguishers.



COMPLAINE GUIDELINES FOR HEALTH AND SAFETY POLICY

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6. Review and Revision

This policy will be reviewed annually and revised as necessary to reflect changes in regulations, technology, and organizational needs. Feedback from employees and safety audits will be considered in the review process.

7. Compliance

All employees, contractors, and visitors are expected to comply with this Health Safety Policy. Non-compliance will result in disciplinary actions.

Change Summary

Change Summary		
Sr.	Rev. No. / Date	Change Details
01	00 / 30.08.2024	New Release
Prepared By : Aswani Nayak (QMS)		Approved By : Vinod Jain (Director)



BUSINESS ETHICS POLICY

Policy No. : MR/MP/33

Rev. No. 01 / 09.09.2024

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1. Anti-Corruption and Anti-Money Laundering

Policy Statement:

SKS is committed to conducting business with integrity and in compliance with all applicable anti-corruption and anti-money laundering laws and regulations. SKS do not tolerate bribery, corruption, or any form of illicit financial transactions.

Guidelines:

- **Bribery and Corruption:** Employees must not offer, give, solicit, or receive any bribe or kickback, directly or indirectly.
- **Money Laundering:** Employees must not participate in or facilitate money laundering activities. SKS maintains robust practices to prevent and detect money laundering.

2. Data Protection and Data Security

Policy Statement:

SKS is committed and dedicated to protecting the privacy and security of personal and business data. Our practices comply with relevant data protection laws as applicable to our operations.

Guidelines:

- **Data Protection:** Personal data must be collected, processed, and stored only for legitimate business purposes and in compliance with legal requirements.
- **Data Security:** Implement appropriate technical and organizational measures to protect data from unauthorized access, alteration, disclosure, or destruction.

3. Financial Responsibility (Accurate Records)

Policy Statement:

SKS is committed to maintaining accurate and complete financial records. All transactions are recorded transparently and in accordance with accounting principles and legal requirements.

Guidelines:

- **Record Keeping:** Ensure that all financial records and reports are accurate, complete, and timely.
- **No Falsification:** Do not falsify any financial documents or engage in deceptive accounting practices.



BUSINESS ETHICS POLICY

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4. Disclosure of Information

Policy Statement:

SKS believe in transparency and will disclose information accurately and timely, in accordance with legal requirements and business obligations.

Guidelines:

- **Public Disclosure:** Ensure all public communications are truthful and not misleading.
- **Confidential Information:** Protect and handle confidential information appropriately, disclosing it only when authorized or legally required.

5. Fair Competition and Anti-Trust

Policy Statement:

SKS is committed to fair competition and shall comply with all relevant anti-trust and competition laws.

Guidelines:

- **Anti-Competitive Practices:** Avoid engaging in anti-competitive practices such as price-fixing, market allocation, or bid-rigging.
- **Competition Laws:** Ensure business practices comply with applicable competition laws and regulations.

6. Counterfeit Parts

Policy Statement:

SKS does not tolerate the use or distribution of counterfeit parts and is committed to ensuring the authenticity of all parts used or sold.

Guidelines:

- **Supplier Verification:** Implement robust procedures to verify the authenticity of parts and materials.
- **Reporting:** Report any suspected counterfeit parts immediately to the relevant authorities.



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7. Intellectual Property

Policy Statement:

SKS respect intellectual property rights and expect all employees to adhere to intellectual property laws and respect the intellectual property of others.

Guidelines:

- **Respect Intellectual Property Rights:** Do not infringe on patents, copyrights, trademarks, or trade secrets.
- **Use of Intellectual Property:** Ensure proper authorization for using any intellectual property that belongs to others.

8. Export Controls and Economic Sanctions

Policy Statement:

SKS is committed to comply with all relevant export controls and economic sanctions regulations to prevent illegal or unauthorized exports.

Guidelines:

- **Export Compliance:** Ensure all exports are in compliance with applicable laws and regulations.
- **Sanctions List:** Avoid engaging with individuals or entities that are subject to economic sanctions or trade restrictions.

9. Whistleblowing and Protection Against Retaliation

We encourage employees to report any unethical behavior or violations of this policy. Whistleblowers shall be protected from retaliation. Refer Policy No. MR/MP/27.



COMPLIANCE GUIDELINES FOR ENVIRONMENTAL POLICY

Policy No. : MR/MP/34

Rev. No. 00 / 30.08.2024

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1. Purpose

To establish a framework for managing the organization's environmental impacts and to demonstrate commitment to sustainable practices and compliance with environmental regulations.

2. Scope

This guideline applies to all operations, processes, and activities conducted by the organization, including those related to greenhouse gas (GHG) emissions, energy use, renewable energy, water management, air quality, chemical management, resource use, waste management, animal welfare, biodiversity, land use, soil quality, and noise emissions.

3. Greenhouse Gas (GHG) Emissions

SKS is committed to reducing our GHG emissions through:

- Implementing energy-efficient technologies and practices.
- Enhancing our energy management systems.
- Investing in renewable energy sources.
- Promoting energy conservation and efficiency across our operations.
- Setting and pursuing targets for decarbonization and achieving net-zero emissions.

4. Energy Efficiency and Renewable Energy

SKS shall

- Promote energy efficiency in our operations and facilities.
- Support and invest in renewable energy projects and technologies.
- Encourage the use of renewable energy sources where feasible.
- Continuously seek opportunities to reduce our energy consumption and increase energy efficiency.

5. Water Quality and Management

SKS is committed to:

- Protecting water quality by preventing pollution and managing wastewater effectively.
- Reducing water consumption through efficient use and conservation practices.
- Implementing water management strategies to ensure sustainable water use.

6. Air Quality

To maintain and improve air quality, SKS shall :

- Implement measures to reduce emissions of pollutants.
- Monitor and manage air quality impacts from our operations.
- Adopt best practices for minimizing air pollution and enhancing air quality.

7. Responsible Chemical Management

SKS shall :

- Use chemicals responsibly and minimize their environmental impact.
- Ensure proper storage, handling, and disposal of chemicals.
- Promote the use of safer alternatives and reduce hazardous substances in our operations.

8. Sustainable Resource Management

SKS is committed to:

- Using resources efficiently and sustainably.
- Reducing our consumption of non-renewable resources.
- Supporting practices that enhance resource conservation and sustainability.

9. Waste Reduction, Reuse, and Recycling

Our waste management practices includes:

- Reducing waste generation through process improvements and efficiency measures.
- Promoting the reuse of materials and products where possible.

10. Animal Welfare

SKS is committed to:

- Ensuring the humane treatment of animals.
- Adhering to ethical standards and regulations related to animal welfare.



COMPLAINCE GUIDELINES FOR ENVIRONMENTAL POLICY

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11. Biodiversity

SKS shall:

- Protect and enhance biodiversity by minimizing our impact on natural habitats and ecosystems.
- Support conservation efforts and sustainable practices that preserve biodiversity.

12. Land Use and Deformation

SKS shall:

- Manage land use practices to prevent and mitigate land deformation and environmental degradation.
- Adopt sustainable land management practices to protect and restore natural landscapes.

13. Soil Quality

Our practices aim to:

- Prevent soil contamination and degradation.
- Implement measures to protect and enhance soil quality and health.

14. Noise Emission

To manage noise emissions, SKS shall:

- Monitor and control noise levels to minimize disturbances.
- Implement noise reduction measures and best practices to manage noise impacts.
- Use of PPE

15. Implementation and Review

We shall regularly review and update this guideline to reflect changes in regulations, technology, and best practices. Our commitment to environmental management shall be reflected in our organizational culture, operations, and practices.

Change Summary

Sr.	Rev. No. / Date	Change Details
01	00 / 30.08.2024	New Release
Prepared By : Aswani Nayak (QMS)		Approved By : Vinod Jain (Director)



RESPONSIBLE SOURCING OF RAW MATERIAL POLICY

Policy No. : MR/MP/35

Rev. No. 00 / 30.08.2024

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1. Purpose

The purpose of this Responsible Sourcing Policy is to establish and promote ethical, sustainable, and compliant practices in the procurement of raw materials. This policy aims to ensure that all sourced materials are obtained in a way that respects environmental and social standards and supports long-term sustainability.

2. Scope

This policy applies to all departments and personnel involved in the sourcing, procurement, and management of raw materials across all operations and supply chains.

3. Policy Statement

SKS is committed to responsible sourcing of raw materials. We are dedicated to ensuring that our sourcing practices contribute to environmental sustainability, uphold human rights, and foster economic development. Our sourcing practices shall reflect our commitment to ethical standards, transparency, and continuous improvement.

4. Principles

4.1. Environmental Management:

- **Sustainable Sourcing:** Prioritize materials from suppliers that practice environmental sustainability and have certifications such as ISO 14001.
- **Resource Efficiency:** Choose materials that support efficient use of resources and have a lower environmental impact.
- **Waste Management:** Ensure that suppliers manage waste responsibly and reduce their environmental footprint.

4.2. Social Responsibility:

- **Human Rights:** Support suppliers that respect human rights, including fair wages, safe working conditions, and freedom from discrimination and forced labor.
- **Community Engagement:** Engage with suppliers that positively contribute to their local communities and support social development initiatives.



RESPONSIBLE SOURCING OF RAW MATERIAL POLICY

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4.3. Regulatory Compliance:

- **Legal Adherence:** Ensure all raw materials comply with relevant local, national, and international regulations, including restrictions on hazardous substances and trade regulations.
- **Certifications:** Verify that suppliers have necessary certifications and adhere to industry standards and regulations.

5. Supplier Requirements

5.1. Evaluation and Selection:

- **Criteria:** Evaluate suppliers based on their environmental and social practices, certifications, and compliance with regulations. Use objective criteria to assess potential risks and benefits.
- **Audits:** Conduct regular audits and assessments to ensure suppliers meet our responsible sourcing standards.

5.2. Agreements:

- **Contracts:** Include responsible sourcing requirements in supplier contracts, specifying expectations for environmental and social practices.
- **Commitments:** Require suppliers to commit to continuous improvement and adherence to responsible sourcing standards.

6. Risk Management

6.1. Risk Assessment:

- **Identification:** Identify potential risks associated with sourcing raw materials, including environmental, social, and regulatory risks.
- **Mitigation:** Develop and implement strategies to mitigate identified risks and address any non-compliance issues.

6.2. Monitoring and Reporting:

- **Performance Monitoring:** Continuously monitor supplier performance and sourcing practices through supplier performance index on regular reviews.



CSR / SUSTAINABILITY REQUIREMENTS FOR SUPPLIERS

Policy No. : MR/MP/36

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1 : Purpose

To establish a comprehensive framework for integrating Corporate Social Responsibility (CSR) and sustainability into our supplier relationships. It aims to ensure that all suppliers align with our ethical, environmental, and social standards, thereby promoting responsible business practices throughout our supply chain. This document serves as a guide to maintain transparency, uphold our commitment to sustainability, and mitigate risks associated with non-compliance, ultimately supporting our long-term goals for ethical and sustainable operations.

2 : Scope

This policy document applies to all suppliers engaged with our organization, including those providing goods and services at any level of the supply chain.

3 : Requirements

3.1 : Child Labour and Young Workers

Prohibit the use of child labor whose age is less than 18 years. Implement age verification processes and regularly review employment records.

3.2 : Wages and Benefits

Pay at least the legal minimum wage or a living wage, provide fair benefits, and ensure timely payment of wages and maintain transparent payroll records.

3.3 : Working Hours

Adhere to legal limits on working hours and overtime. Provide adequate rest periods and days off.

3.4 : Modern Slavery

Prohibit all forms of modern slavery, including forced labor and human trafficking. Implement anti-slavery policies, provide training, and conduct regular audits.

3.5 : Ethical Recruiting

Ensure recruitment practices are free from coercion, deception, or exploitation. Use clear, fair recruitment processes and provide transparency regarding employment terms.



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- 3.6 : **Freedom of Association and Collective Bargaining**
- Respect workers' rights to freely associate and engage in collective bargaining. Promote open dialogue and ensure non-discrimination against union activities.
- 3.7 : **Non-Discrimination and Harassment**
- Implement policies against discrimination and harassment based on race, gender, religion, etc. Provide anti-discrimination training and establish clear reporting mechanisms.
- 3.8 : **Women's Rights**
- Ensure equal opportunities, fair treatment, and support for women in the workplace. Implement gender diversity programs and promote work-life balance initiatives.
- 3.9 : **Diversity, Equity, and Inclusion (DEI)**
- Promote a diverse and inclusive workplace environment.
- 3.10 : **Rights of Minorities and Indigenous Peoples**
- Respect and uphold the rights of minorities and indigenous peoples. Engage with affected communities and integrate their perspectives into decision-making processes.
- 3.11 : **Land, Forest, and Water Rights**
- Respect legal and customary land and water rights. Avoid forced evictions. Obtain and maintain required consents.
- 3.12 : **Use of Private or Public Security Forces**
- Ensure that any security forces used operate in a manner consistent with human rights. Implement protocols for managing security forces and provide human rights training.
- 3.13 : **Health and Safety**
- Comply with health and safety regulations to protect workers from occupational hazards. Conduct regular health and safety training and audits.
- 3.14 : **Anti-Corruption and Anti-Money Laundering**
- Implement measures to prevent corruption and money laundering. Establish anti-corruption policies and provide regular training.



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3.15 : Data Protection and Data Security

Ensure compliance with data protection laws and safeguard personal and sensitive information. Implement robust data security measures.

3.16 : Financial Responsibility

Maintain accurate and transparent financial records. Follow standard accounting practices and regulations. Perform regular financial audits. Ensure compliance with financial regulations and reporting requirements.

3.17 : Disclosure of Information

Provide accurate and timely information about operations, financial performance, and CSR practices. Publish regular sustainability and financial reports, as applicable.

3.18 : Fair Competition and Anti-Trust

Adhere to competition laws and avoid anti-competitive behavior. Monitor market practices for compliance with anti-trust laws.

3.19 : Conflicts of Interest

Avoid and disclose any conflicts of interest. Implement policies to manage and address conflicts of interest.

3.20 : Counterfeit Parts

Ensure the authenticity of parts and products. Implement verification processes to detect counterfeit parts. Work with trusted suppliers and use authenticity checks.

3.21 : Intellectual Property

Respect intellectual property rights and avoid infringement. Implement intellectual property management practices.

3.22 : Export Controls and Economic Sanctions

Adhere to export control laws and economic sanctions. Stay informed about relevant regulations and ensure compliance. Regularly review export practices and compliance with sanctions. Implement controls and procedures to manage export-related risks.

- 3.23 : **Whistleblowing and Protection Against Retaliation**
- Provide mechanisms for confidential whistleblowing. Protect whistleblowers from retaliation. Establish and review whistleblowing procedures.
- 3.24 : **Greenhouse Gas (GHG) Emissions**
- Monitor and report GHG emissions. Implement strategies to reduce GHG emissions. Track progress against emissions reduction targets.
- 3.25 : **Energy Efficiency and Renewable Energy**
- Implement energy-efficient practices and technologies. Improve energy efficiency and increase the use of renewable energy sources.
- 3.26 : **Decarbonization**
- Develop and implement decarbonization strategies.
- 3.27 : **Water Quality, Consumption, and Management**
- Ensure sustainable water use and protect water quality. Implement water conservation practices and monitor water usage.
- 3.28 : **Air Quality**
- Comply with air quality regulations and minimize emissions. Monitor air quality and invest in technologies to reduce emissions.
- 3.29 : **Responsible Chemical Management**
- Safely manage and dispose of chemicals. Implement chemical management policies and conduct regular safety checks.
- 3.30 : **Sustainable Resource Management**
- Use resources efficiently and sustainably. Develop resource management strategies and reduce waste.
- 3.31 : **Waste Reduction, Reuse, and Recycling**
- Implement waste management practices to reduce, reuse, and recycle materials. Develop waste reduction programs and track waste performance.



CSR / SUSTAINABILITY REQUIREMENTS FOR SUPPLIERS

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- 3.32 : **Animal Welfare**
Ensure humane treatment of animals
- 3.33 : **Biodiversity**
Protect and promote biodiversity in operations. Implement practices to minimize impacts on biodiversity and support conservation efforts.
- 3.34 : **Land Use and Deforestation**
Avoid deforestation and use land sustainably. Support sustainable land use practices and reforestation projects.
- 3.35 : **Soil Quality**
Prevent soil degradation and contamination. Implement soil management practices and monitor soil health.
- 3.36 : **Noise Emissions**
Control noise emissions to comply with regulations and minimize impact. Use noise reduction technologies / practices and monitor noise levels.
- 3.37 : **Definition and Implementation of Similar Standards Towards Tier-1 Suppliers**
Extend CSR and sustainability standards to tier-1 suppliers.
- 3.38 : **Binding Requirements Towards Tier-1 Suppliers to Pass on Standards Along the Supply Chain**
Ensure tier-1 suppliers enforce standards down the supply chain. Include requirements in contracts and monitor compliance throughout the supply chain.

Change Summary

Sr.	Rev. No. / Date	Change Details
01	00 / 30.08.2024	New Release
Prepared By : Aswani Nayak (QMS)		Approved By : Rahul Dudani (Director)