

SUPPLIER CODE OF CONDUCT

Dated 8th March 2024



NAVNEET EDUCATION LIMITED

A. Preamble

Navneet Education Limited (NEL) is in the business of printing educational material and stationery and non-stationary products manufacturing. Our commitment extends beyond delivering quality products; we are dedicated to cultivating a business that actively generates positive environmental and societal impacts while upholding the highest standards of governance.

NEL believes that society and business are best served by responsible business behaviour and practices. We hold our suppliers to the same high standards of sustainable and responsible business behavior.

The Supplier Code of Conduct (hereinafter referred to as 'Code') sets out minimum requirements for our suppliers as decided by us (hereinafter referred to as Suppliers) to operate in accordance with responsible business principles detailed in this Code and in full compliance with all applicable laws and regulations.

The Code does not replace local law or labor agreements. NEL expects Suppliers to operate in compliance with applicable laws, rules, and regulations, in addition to the standards contained herein.

B. Scope and Coverage:

This Code outlines the ethical and responsible behavior expected from our suppliers and partners in relation to environmental, social, and governance aspects. This Code applies to all suppliers and contractors including service providers ("Suppliers") engaged in providing goods and/or services to NEL.

The Code reflects our commitment towards National Guidelines on Responsible Business Conduct ("NGRBC") principles and our alignment towards United Nations Sustainable Development Goals, the Guiding Principles on Business and Human Rights and the International Labour Organization conventions.

C. The Supplier Code of Conduct (“The Code”)

1. Environment:

NEL insist that our suppliers incorporate environmental considerations into their operations and continuously pursue enhancements to reduce or mitigate any negative environmental effects. Suppliers must:

- 1.1. Comply with all relevant local and national environmental laws and standards, obtain and maintain all the necessary environmental permits, approvals, and registrations.
- 1.2. Use resources efficiently, apply energy- efficient and environmentally friendly technologies.
- 1.3. Track and monitor its emission footprints and commit to reduce emissions.
- 1.4. Minimize its impact on biodiversity by taking measures such as reforestation.
- 1.5. Adopt three technologies of reduce, reuse and recycle and promote circularity.
- 1.6. The supplier dealing in products shall maintain a clear and transparent linkage to the source of material utilized in their production processes. This includes comprehensive records and documentation that trace whether the raw materials used was virgin, recycled, or from other source materials. The manufacturer shall be able to provide this information upon request, demonstrating accountability and responsible sourcing practices.
- 1.7. Develop and implement effective environmental management systems that support identifying risks, measuring and monitoring performance, and driving continual improvements.

2. Social:

We are dedicated to establishing and upholding a workplace environment that prioritizes and respect human rights and ensure fair and equitable treatment to all stakeholders. We extend this commitment to our suppliers, expecting them to likewise embrace and enforce comparable standards. Supplier must:

Employee and Workers:

- 2.1 Comply with all relevant local and national labour and community laws as well as standards, obtain and maintain all the necessary permits, approvals, and registrations.
- 2.2 Protect human rights in your operations and for your employees, and do not directly or indirectly use forced labour (including, but not limited to, modern slavery and human trafficking) and child labour of any kind, or inputs produced using such labour.
- 2.3 To ensure that employees and workers including trainees, under the age of 18 do not undertake the night shift work or work overtime to carry out work that is hazardous or harmful to their physical or mental development.
- 2.4 Uphold the freedom of association and the right to collective bargaining in accordance with applicable laws
- 2.5 Treat your employees and workers with respect, promote an inclusive work environment and prohibit discrimination, unequal treatment, harassment, abuse or inhumane treatment against anyone, for example on the grounds of ethnic descent or origin, race or color, religion or ideology, gender, sexual orientation, etc, or any other characteristic

protected by applicable law. Suppliers are expected to extend the validation of this principle throughout their supply chain.

- 2.6 Promote diversity, inclusion, and equal opportunity.
- 2.7 Comply with minimum wages and working hours in accordance with local laws and ensure fair compensation of a living wage according to local living conditions.
- 2.8 Provide all the mandatory benefits to the employees.

Health and Safety:

- 2.9 Develop and implement effective health and safety management systems with worker participation in the Safety Committee.
- 2.10 Ensure that Safety Management Systems support identification of crisis, measuring and monitoring performance and driving continual improvements to mitigate or minimize health and safety risks emanating from its operations.
- 2.11 Ensure the compliance with applicable laws, regulations and customer requirements.
- 2.12 Ensure protection of their workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on health and safety personnel.
- 2.13 Empower workers to report unsafe practices without fears of reprisal.
- 2.14 Commit to proactively undertake safety initiatives to protect people and assets from harm and damage.

Data Privacy

- 2.15 Ensure appropriate data and cyber security systems are in place.

Product safety

- 2.16 Adhere to strict product safety standards, especially when dealing with hazardous products.
- 2.17 Ensure appropriate disclosure on products and services related to environment and social safety. Clearly label hazardous products with appropriate warnings, instructions for safe use, and emergency contact information.
- 2.18 Promptly notify the Company of any safety-related incidents, recalls, or issues related to their supplied products or services.

Stakeholder management

- 2.19 Have appropriate whistle blowing and grievance management process in place for all relevant stakeholders including employees, workers, supplier, customer, and community.

Responsible content

Suppliers engaged in content creation for the company must adhere to the following:

- 2.20 All content must be original, and content writers should refrain from plagiarism or any form of intellectual property infringement. In case of any exception the same should be formally communicated while submitting the work. Proper attribution and citation of sources, when applicable, should be included in the content.
- 2.21 Content should be developed and delivered in compliance with ethical principles, including respect for intellectual property rights, avoidance of deceptive practices, and sensitivity to cultural, social, and political contexts.

- 2.22 Content writers are responsible for ensuring that their work complies with all applicable laws and regulations, including copyright, trademark, and defamation laws.
- 2.23 Content writer should be sensitive to issues of diversity, inclusivity, and cultural relevance, avoiding content that may be considered offensive, discriminatory, or biased.

3. Governance and Business Ethics

We require our suppliers to build strong corporate governance and conduct their business by adopting the highest standards of ethical behaviour. Supplier must:

- 3.1 Should abide by all applicable national laws and regulations including applicable laws regarding fair competition and antitrust.
- 3.2 Suppliers shall avoid interaction with NEL employee that may conflict with that employee acting in the best interests of NEL.
- 3.3 Prohibits all forms business malpractices including bribery, corruption and money laundering.
- 3.4 Respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse.
- 3.5 Implement an appropriate compliance management system which facilitates compliance with applicable laws, regulations and standards.
- 3.6 Suppliers actively engage their supply chain in order to increase transparency and traceability
- 3.7 Establish training measures to allow your managers and employees to gain an appropriate level of knowledge

- 3.8 Suppliers are encouraged to report instances of illegal or improper conduct from employees of NEL or anyone with respect to their business without risk of retaliations.

D. Exclusions

In addition to the outlined scope, it's important to note that the Code is adopted at the company level, indicating a uniform expectation of ethical and responsible behaviour across all suppliers and partners engaged with NEL. However, recognizing that certain clauses of the code may be more relevant or applicable to specific classes of vendors based on the nature of their goods or services, the company's commercial team will consider such distinctions on a case-by-case basis. This approach ensures that while the overarching principles of the code apply universally, there is flexibility to address specific circumstances and requirements tailored to different types of vendors, ultimately promoting a more effective and equitable implementation of the code across the supply chain.

E. Grievance Redressal Process:

Apart from general business queries which can be raised through current business channels, Supplier can raise a concern or escalation to grievance_supplier@navneet.com.

Supplier can also use the current whistle blower mechanism grievance_supplier@navneet.com; to report concerns about potential legal, regulatory, or ethical misconduct, such as concerns regarding:

- a. regulatory compliance
- b. bribery or other improper payments
- c. potential money laundering or other suspicious activity
- d. inappropriate conflicts of interest
- e. Improper or questionable behaviour by employees, supervisors, clients, counterparties, consultants, suppliers or other third parties.

F. Implementation:

Our suppliers must acknowledge and pledge their commitment to uphold this code. We evaluate the compliance of our suppliers with this code by utilizing a comprehensive approach that includes self-assessments and declarations, audits, and thorough documentation reviews.

G. Accountability

NEL reserves the right to assess, monitor and audit suppliers' compliance with this Code.