



ETHICS

PRINCIPLES AND ETHICS POLICY

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1. Objective

Suprajit Engineering Limited being a manufacturing industry, is often faced with decisions that could easily err on the side of being unethical towards its employees and against local and international financial and legal frameworks. We understand and encourage the importance of ethics to ensure standard of the products, services, working conditions and strives to control corruption, bribery, money laundering, anti-competitive practices and poor information management. Ethics plays an important role for us not only to ensure market trust in us but also to ensure that no actions taken by the organization are illegal. The International Monetary Fund (IMF) clearly calls out that curbing corruption can yield significant fiscal benefits. Their research suggests that revenues are higher in countries perceived to be less corrupt, the same finding can be extended and applied to the organization level as well. We do not take part in or encourage any activity that may result in the stifling of competition. It is essential at this stage to mention that for an organization to be successful the sensitivity of data and knowledge must be protected to ensure the longevity of the business. Keeping these in mind, we have drafted this Principles and Ethics Policy that will help keeping the ethics of the organization in check.

2. Scope Of Application

This policy applies to all staff members (full-time, part-time, and contractual) including Phoenix Lamps Division, Suprajit Controls Division and suppliers of Suprajit Group.

3. Our Commitment

Our company adheres to the commitments made in regard to the following topics:

3.1 Misconduct and Deception

The Company takes a zero-tolerance stance towards any form of corruption and/or bribery. Under no circumstances should a staff member receive or offer monetary and/or other benefits in return for personal benefit. The power of the staff member is entrusted to him by the Company and should never be abused.

Acceptance of gifts or cash from any person or firm doing or seeking to do business with the Company under circumstances from which it might reasonably be inferred that the purpose of the gift is to influence the employee in the conduct of the Company's business with the donor.

Targets:

- To train 90% of employees on topics of corruption and bribery by 2027.
- To ensure 100% investigation and action taken on any incidents reported on corruption and bribery.
- To get certified to ISO 37001 Anti bribery risk assessment by 2028.

3.2 Unfair Practices in Market

The Company shall never participate in or engage in practices which restrict market competition and provides an unfair advantage. We believe in fair competition. Respect should be given to both consumers and other market players.

Targets:

- To train 90% of employees on topics of anti-competition by 2027.

3.3 Management of Sensitive Information and Knowledge

Suprajit Engineering Limited regards information entrusted to us seriously and with confidentiality. During the course of a person's employment, an employee may be entrusted with some proprietary information and is therefore expected not to jeopardize the Company's competitive position by disclosing such information. Refer to our Code of Conduct for more information.

Apart from information which is in public domains and any information which the employee is required under law to disclose to any judicial, statutory or governmental body, all other information shall be considered proprietary.

Targets:

- To train 90% of employees on the management of sensitive information by 2027.
- To ensure 100% Investigation and Corrective action taken on any incidents reported on information security breaches.

3.4 Conflict of Interest

Suprajit Engineering Limited encourages employees to not be in a situation where they may have to face a choice between their roles and duties as prescribed by virtue of their position in the organization and their personal interests. Any full-time, part-time or contractual staff member found to be in violation of the conflict-of-interest policy is penalized. Conflict of interest for Suprajit includes (but not limited to) imparting delicate data with competitors, joining a contender association and implementing the procedures of Suprajit Engineering Limited there, accepting bribes or gifts to assign tenders, etc. Staff members tracked down acting against the association by being in circumstance of irreconcilable situation will be punished.

Targets:

- To train 90% of employees on conflict of interest by 2027.

3.5 Fraud

Frauds, especially financial frauds, occurring within an organization or with a third party by the organization will ultimately impact the revenue and image of the business. Suprajit Engineering Limited doesn't deliberately misdirect somebody to acquire an unjustifiable or potentially unlawful monetary benefit or market advantage.

The fraud policy is communicated to employees, contractors and suppliers. Our fraud policy statement clearly calls out the responsibility of all full-time, part-time and contractual employees to prevent and detect fraud and report them through the whistle blower procedure. We firmly censure any staff member indulging in fraudulent behavior either for their personal benefit or to fast-track any operations/decision making of the organization.

Targets:

- To train 90% of employees on topics of fraud by 2027.
- To ensure 100% Investigation and corrective action taken on any incidents of fraud.

3.6 Money Laundering

Suprajit Engineering Limited does not indulge in and discourages concealing the origin, ownership or destination of illegally or dishonestly obtained money by hiding it within legitimate economic activities to make them appear legal. Channels of monetary exchanges are routinely reviewed, and all staff members are urged to report any illegal tax avoidance/money laundering actions that might have come to their attention. If caught in violation of the money laundering policy, violators are arraigned as recommended by the law.

Targets:

- To train 90% of employees on topics of money laundering by 2027.
- To ensure 100% Investigation and corrective action taken on any incidents of money laundering.

4. Responsibilities

Information sharing about this policy along with ensuring that the policy is enforced and abided by will be the responsibility of management and the employees.

Management – To enforce the policy document upon the organization and all staff members.

Staff members – To adhere to this policy and execute it.

5. Review

Annual review about the extent to which this policy document is being enforced and followed by the organization, its various departments as well as all business units will be conducted by the senior management of the organization. Review of this policy document also extends to its application by the suppliers. Revision details are provided at the end of this document.

6. Communication

Suprajit Engineering Limited will rely on the following channels of communication to disseminate information about this policy.

1. During onboarding of employees, the policy document will be shared with the new staff members.
2. Post review email sent out to full-time, part-time, contractual employees and suppliers.

7. Reporting

Non-compliance of this Policy is looked upon critically. Full-time, part-time, contractual employees and especially the senior management will be responsible for identifying the areas of breach and any assistance from the employees is encouraged. We bank upon all our employees to report any suspected breaches of this policy by writing to [Anonymous Feedback - Suprajit Group](#) or calling on [+918043421100](#). The confidentiality and anonymity of all employees reporting any suspected neglect of this policy will be protected by the company's Whistleblower Policy.



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Mohan N.S
Managing Director & Group CEO

8. Revision History

Revision no.	Date of last review	Revision Details	Date of next review
00	02.01.2024	Initial issue	JAN 2025
01	29.01.2025	Objective Targets and reviewed and revised for year 2026	JAN 2026
02	28.01.2026	2 Scope of application expanded to include specific divisions of the Group globally. Targets reviewed and revised for 2027	JAN 2027