



Code of Conduct / Sustainability guiding principles

METALANTIC's vision "To be a preferred Metal, Alloys & Component supplier in world market", which result in the trust & loyalty of the customers", indicates the long-term focus of METALANTIC's work. METALANTIC is a highly specialized, promising and leading Contract Manufacturing & Engineering Product Company and our products, smart solutions help to make end products & assemblies accurate and increase their productivity and lifespan. This leads to improved total economy and a reduced impact on the environment.

At METALANTIC we consider sustainability to be an essential part in all our business operations. METALANTIC is committed to a Code of Conduct / sustainable work behavior which describes how we do business. METALANTIC is a deep follower of UN Global Compact guidelines and actively supports the ten principles covering human rights, labor, the environment and anti-corruption.

As part of our work to achieve a more sustainable world, METALANTIC has implemented certain governing principles for our stakeholders. These principles are based on the UN's Global Compact principles. The purpose of these principles is to ensure that we collaborate with stakeholders who share our values regarding sustainability. ***We expect that our stakeholders, as a minimum, follow our sustainability principles when conducting their own business.***

This is the starting point for entering into and maintaining a business relationship with METALANTIC. These principles are included in this Code of Conduct / Stakeholder Sustainability Policy.

APPLICABILITY

The Stakeholder Sustainability Policy applies to all stakeholders providing products and/or services to any METALANTIC Group Company.

Workers/employees are considered to be all people who are working for the stakeholder, whether directly employed, subcontracted or employed by other agency.

METALANTIC expects the stakeholder to monitor its own stakeholders in order to ensure commitment to environmental and social responsibility.

COMPLIANCE

METALANTIC has a process in place to follow-up compliance of stakeholders' sustainability work. Stakeholders may be asked to answer a self-assessment questionnaire regarding their social and environmental performance. METALANTIC, reserves the right to conduct reviews and/or on-site audits of our stakeholders to ensure compliance with this Stakeholder code of conduct Policy. Stakeholder agrees to cooperate in order to facilitate such reviews or audits. In some cases where we find that stakeholder is willing to adhere to these guiding principles but due to scarcity of resources they could not, then we try to support them and work closely with them to ensure they attain the level of those stakeholders who follows these guiding principles and are sustainable in doing business with METALANTIC.

SUSTAINABLE PRINCIPLES FOR OUR STAKEHOLDERS

General

The stakeholder shall comply with applicable legislative and regulatory requirements. Stakeholder shall not compromise safety in the pursuit of commercial advantage. Stakeholder shall strive to provide a safe, healthy and clean working environment for their employees and all those who work for them.

Labor and Human Rights

Health & Safety

The stakeholders shall provide a safe and healthy working environment and take all practicable steps to prevent incidents and injuries. Occupational hazards and injuries shall be documented and necessary measures shall be taken to prevent accidents from reoccurring.

The stakeholders shall ensure that all employees are provided with necessary instructions, training and personal protective equipment free of charge necessary for facilitating safe work methods.

No Child Labour

No person shall be employed who is below the minimum legal age for employment. It is forbidden to use children under the minimum legal working age or Sixteen (16) years old; whichever is higher, as labor. Employees under eighteen (18) years of age shall not carry out hazardous work.

No Forced OR Compulsory Labor

The Stakeholder shall not engage in or support the use of any form of forced, compulsory or illegal labor. Work must takes place on a voluntary basis, and personal documents and possessions must not be confiscated in order to force somebody to work.

Minimum Wage & Benefits

As a minimum, statutory wages must be paid and applicable working time legislation must be followed.

Freedom of Association

Employees shall be free to form and join, or not to join, trade unions and to bargain collectively.

Discrimination

No employee shall be discriminated on grounds of their gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, or disability.

Harassment

Stakeholder must prohibits harassment of any kind, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of stakeholder including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy.

Sexual harassment

Sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions ... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Non-Retaliation

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

Confidentiality or Protection of Identity

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the HR head will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

Environment

Stakeholders shall work in a systematic, goal-oriented and proactive manner to reduce the impact to the environment including pollution prevention and waste minimization.

The business must be run in such a way that serious discharges and emissions to the ground, water and air are systematically prevented under responsible chemical & pollution prevention management.

Waste should be controlled in scientifically targeted manner to ensure that minimum waste is generated.

Stakeholder must work on initiatives like Clean City/Green City, Save Electricity, Water conservation through day to day use, plantation etc.

Stakeholder should explore the possibilities to invest & harvest in the benefits of new evolving technologies like STP, Bio Gas, and Rain harvesting system, Energy Efficient Lighting System, Wind Energy etc.

Anti-Corruption, Fair Competition

METALANTIC conducts business responsibly and in compliance with the legal requirements and governmental regulations of the countries in which we operate. Therefore, the company will under no circumstances tolerate illegal or non-compliant behavior. We have set ourselves globally-binding principles and guidelines that require all employees and managers to behave in an ethical, law-abiding manner. Equally, METALANTIC expects its stakeholders to comply with all applicable laws and regulations, in particular in the field of anti-corruption and antitrust.

What we expect from our stakeholders:

- To comply with the laws of the applicable legal systems;
- All forms of corruption and bribery are unacceptable. Stakeholder should work against corruption and bribery in all its forms, to tolerate no form of and not to engage directly or indirectly in any form of corruption or bribery and not to grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage; including but not limited to extortion, fraud, money laundering and facilitation payments.
- To act in accordance with national and international competition laws (Anti-Trust Laws) that promotes or seeks to maintain market competition by regulating anti-competitive conduct by companies for e.g. participating in price fixing, market or customer allocation, market sharing or bid rigging with competitors etc.
- To respect the intellectual property rights of other stakeholders & their stakeholders.

Conflict of Interest

This guideline seeks to ensure that in decision-making of the Stakeholder's conflicts of Stakeholder's members between: personal/professional interests, duties of trust or obligations of good faith; and their obligations to or with the Stakeholder thus METALANTIC; are identified, recorded and appropriately managed.

Conflicts of interest must be seen to be managed fairly and effectively. To achieve this, the processes for identifying, disclosing, recording and managing conflicts of interest must be transparent – that is, the processes should be open to scrutiny and should help maintain accountability.

Managing conflicts of interest well is not only good practice, but it also protects the public entity and the member or official involved. A conflict of interest that is hidden, or that is poorly managed, creates a risk of allegations or perceptions of misconduct, or of other adverse consequences such as litigation.

Conflicts of interest may be discovered and may still have an impact after a member has left the Stakeholder.

The Stakeholder should encourage the training and provision of education opportunities for all members in respect of conflict of interests. It will make this policy accessible to be included in any training or educational exercise organized for its members

Disclosure of the Information & Intellectual Property (IP) as Confidential Information

Stakeholder shall use the Confidential Information solely for the benefit of METALANTIC and its affiliated companies in connection with the provision or receipt of Purchased Items or services pursuant to a METALANTIC purchase order, and for no other purpose. Stakeholder shall not, directly or indirectly, disclose to or use for the benefit of any third parties any Confidential Information (i.e. Information related to Design, Special Manufacturing Processes, other technical patented documents, Company Logo, Trademarks, Taglines etc. which are officially registered at law abide agencies under government of India) without the express prior written consent of an authorized officer of METALANTIC; provided that Stakeholder may disclose Confidential Information to its consultants and subcontractors who have signed written obligations of confidentiality no less stringent than those contained herein, but only to the extent necessary for Stakeholder's provision of services to METALANTIC.

Stakeholder understands that all Confidential Information furnished must be strictly safeguarded and protected from unauthorized use or disseminated by it and its employees. Stakeholder will ensure that only those employees that "need to know" shall receive the Confidential Information, that all such employees are informed of the terms and conditions of this policy guideline and that Stakeholder shall take all necessary precautions it normally takes to safeguard its own information from disclosure.

Responsible Sourcing of Raw Material

METALANTIC expects its stakeholders to ensure that they never knowingly procure materials that contribute to human rights abuses, including child and forced labor, bribery and corruption or environmental concerns.

Responsible sourcing expectations must include following:

1. Procure the Raw material which complies with local laws, and avoid banned material.
2. Procure the Raw material which can be reported to designated authorities.
3. Do not procure anything which violets human rights abuses, including child and forced labor, bribery and corruption or environmental concerns.
4. Do not procure anything which consists of "Conflict Minerals" such as 3TG (tantalum, tin, tungsten & gold) banned by United Nations to discourage violent conflicts in the Democratic Republic of the Congo (DRC) and adjoining countries due to its illegal trading.
5. Please submit a "Conflict Mineral Declaration" stating the non-availability of these minerals in raw material originating from conflict countries.

Counterfeit Products / Parts

We understand the potential threat of counterfeit parts entering into the supply chain from wrong hands; this may cause disruption in supply chain because of quality and reliability. We at METALANTIC pay utmost attention to this situation and take all necessary measures to control such potential issues.

Prevention Policy

There are ways that manufacturers can help to guard against counterfeit goods entering the supply chain.

1. At METALANTIC we give utmost importance to marking the product with our foundry identification
2. In case if that logo is also get copied then we have second level of authentication as cavity marking in a unique way, by the variety of combination of cavity marking and logo positioning in different products, we can make out easily whether it is original product made by METALANTIC or not.
3. We also focus on packaging with identifiable data and/or logo.
4. We keep our finished goods inventory in secured finished goods area or warehouse, with all traceable records.
5. We conduct inventory audits every month to understand the FG inventory level to avoid any theft, miss out at any level.

Suppliers

METALANTIC only use audited and proven suppliers for purchases of raw materials and components. These materials are verified on receipt and held in secure designated stores / warehouses. The company maintains a quality system accredited to various relevant quality management certifications.

We also focus during supplier audits on their process controls to avoid any potential mix up at supplier end during manufacturing processes.

Batch Traceability

METALANTIC products show batch codes (or Heat Codes) on the packaging. The batch code enables the original component, and any sub-component, to be traced back to their origin. METALANTIC always encourages suppliers to maintain a healthy and reliable batch traceability so that in the event of any analysis or improvement data can be retrieved and made available for fruitful analysis. One of the example of coding is given below:

Heat Number Coding

1.Objective :
To identify each heat to be poured during the melting process with Crusibal, Year, Month and Serial number for maintaining the traceability with pouring details and actual castings.

2.Scope :
All the castings to be poured in the particular heat will be provided a five/six digit unique heat no. A metal strip with heat no. punched condition should be available with each poured shell.

3.Responsibility :
Melting department is responsible to issue a heat no. and Fettingling Department is responsible to punch heat no. on each casting.

4.Procedure :
4.1 Melting department will generate a heat no. for each heat to be poured as

per the below mention coding method. Heat no. will be punched on a metal strip and each shell will be identified with this particular strip.

4.2 Melting department will prepare the heat no. strips for each heat in advance.

4.3 Fettingling department will receive the poured shell with heat no. strip from melting department. In case of non-availability of strip with particular shell, Fettingling department will ask heat no. for particular shell(s) to melting department.

4.4 Fettingling department will arrange for punching of heat no. on each castings and it will be clearly visible on casting at any stage of the process.

4.5 Fettingling department will arrange for maintaining the traceability of heat no. by suitable means for the castings which are non feasible for heat no. punching or they may concern to fully machining.

Heat No. Coding Method

X
X
XX
XX/XXX

Crusibal Code	Year Code	Month Code	Serial No. of Heat
A - Crusibal 500Kg.	A 2018 N 2031	A January	AA =0001 AZ =0025 AAA =0626 AAZ =0650
B - Crusibal 500Kg.	B 2019 P 2032	B February	BA =0026 BZ =0050 BBA =0651 BBZ =0675
C - Crusibal 300Kg.	C 2020 Q 2033	C March	CA =0051 CZ =0075 CCA =0676 CCZ =0700
D - Crusibal 300Kg.	D 2021 R 2034	D April	DA =0076 DZ =0100 DDA =0701 DDZ =0725
E - Crusibal 50Kg. (Sample)	E 2022 S 2035	E May	EA =0101 EZ =0125 EEA =0726 EEZ =0750
F - Crusibal 100Kg.	F 2023 T 2036	F June	FA =0126 FZ =0150 FFA =0751 FFZ =0775
G - Crusibal 25Kg. (Rollover Furnace)	G 2024 U 2037	G July	GA =0151 GZ =0175 GGA =0776 GGZ =0800
H - Crusibal 25Kg. (Rollover)	H 2025 V 2038	H August	HA =0176 HZ =0200 HHA =0801 HHZ =0825
I - Crusibal 25Kg. (Rollover)	I 2026 W 2039	I September	IA =0201 IZ =0225 IIA =0826 IIZ =0850
J - Crusibal 25Kg. (Rollover)	J 2027 X 2040	J October	JA =0226 JZ =0250 JJA =0851 JJZ =0875
J - Crusible 300 Kg. (Alluminium)	K 2028 Y 2041	K November	KA =0251 KZ =0275 KKA =0876 KKZ =0900
	L 2029 Z 2042	L December	LA =0276 LZ =0300 LLA =0901 LLZ =0925
	M 2030		MA =0301 MZ =0325 MMA =0926 MMZ =0950
			NA =0326 NZ =0350 NNA =0951 NNZ =0975
			PA =0351 PZ =0375 PPA =0976 PPZ =1000
			QA =0376 QZ =0400 QQA =1001 QQZ =1025
			RA =0401 RZ =0425 RRA =1026 RRZ =1050
			SA =0426 SZ =0450 SSA =1051 SSZ =1075
			TA =0451 TZ =0475 TTA =1076 TTZ =1100
			UA =0476 UZ =0500 UUA =1101 UUZ =1125
			VA =0501 VZ =0525 VVA =1126 VVZ =1150
			WA =0526 WZ =0550 WWA =1151 WWZ =1175
			XA =0551 XZ =0575 XXA =1176 XXZ =1200
			YA =0576 YZ =0600 YYA =1201 YYZ =1225
			ZA =0601 ZZ =0625 ZZA =1226 ZZZ =1250

Heat No. Example

I
N
D
IA

Crusibal Code	Year Code	Month Code	Serial No. of Heat
I - Crusibal 25Kg. (Rollover)	2031	April	201

Gray (or Grey) Market

METALANTIC requests their customers not to buy any product outside the purview of purchase agreement, because this type of sourcing does carry risk, this is when counterfeit products are most likely to enter the supply chain with potentially catastrophic results.

Hence, customers for METALANTIC components are advised against using the gray market for sourcing components. In doing so, there is a risk to the integrity of the customer's end product, and the reputation of their company.

Obsolete / Discontinued products

Excess, slow moving or discontinued line items are destroyed on-site if they can't be sold. Also, these products are never sold in the market as per the purchase agreement.

Export controls and Economic sanctions

METALANTIC follow and obeys The Foreign Trade Policy ("FTP") and certain other sector-specific regulations restrict or regulate the import and/or export of certain goods and/or services and require that such export or import may be made in accordance with an authorization, permission or license granted by the Director General of Foreign Trade ("DGFT") or the relevant regulator.

There are following types of sanctions which every legal entity has to follow:

- 1) Trade / Economic sanctions in respect of exports from and imports into India, imposed by Ministry of Commerce and Industry (Department of Commerce) ("MoC") under the framework of Foreign Trade Policy ("FTP") read with the Foreign Trade (Development and Regulation) Act, 1992 ("FTDRA"), measures taken by Ministry of Finance (Department of Revenue) ("MoF") under the Customs Tariff Act, 1975 ("Customs Act"), and the exchange control framework set out under the Foreign Exchange Management Act, 1999 ("FEMA").
- 2) Sanctions relating to security and integrity of India ("Security Sanctions") which are imposed by Ministry of Home Affairs ("MHA") and the Ministry of External Affairs ("MEA") under the provisions of the Unlawful Prevention Activities Act, 1967 ("UAPA") and Prevention of Money Laundering Act, 2002 ("PMLA").
- 3) METALANTIC also follows the National Securities Act, 1980 ("NSA") which authorizes the Government of India to, amongst other things, issues orders to detain any person (an Indian citizen or foreigner) to prevent such person from acting in any manner prejudicial to the security of India (e.g. act of "Terrorism") or from act in any manner prejudicial to the maintenance of public order.

METALANTIC also follow the sanctions in place targeting Iraq, Iran, Somalia and North Korea.

METALANTIC also closely monitor the list of Most Favored Nation (“MFN”) before planning its business activities to avoid any legal embargo afterwards.

By Order:
Director

..... (Seal & Sign OR Digitally Sign)

Date: 11th January 2024
Place: Rajkot