

	Pheon Auto Tech Pvt Ltd	<i>Format Ref.</i>	F-MR-05
<i>Format Name</i>	Controlled Guidelines & Policies	<i>Rev No/Dt</i>	02/ 09.02.2022

Sec.	Description	Particulars			
1	Particulars	Type of Guideline	Policy ☒ Guidelines ☐		
		Name	Supplier Code of Conduct		
		Ref.	G-P-04		
		Department	Purchase		
2	Purpose	The purpose of Supplier Code of Conduct is to extend company's ethical, social, and environmental standards to its entire supply chain, ensuring suppliers uphold fair labor, human rights, safety, and sustainability practices, thereby mitigating risks, ensuring legal compliance, and upholding brand reputation in an interconnected global market. It sets clear expectations for behavior, from anti-corruption measures to environmental protection, fostering responsible sourcing and transparent operations.			
3	Scope	This Policy is applicable to All the direct supplier Partners of Pheon Auto tech Pvt Ltd.			
4	Owner	Group Manager – Purchase & Sourcing			

APPROVED
By MR at 2:38 pm, Sep 02, 2025

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5	Guideline / Policy
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Reference: Supplier Code of Conduct – G-P-04 W.E.F. 01.09.2025

1. Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national laws, regulations, and standards. This includes, but is not limited to, labor laws, health and safety regulations, environmental laws, and anti-corruption legislation.

2. Labour and Human rights

- **Fair Treatment**

Suppliers must treat all employees with dignity and respect. Discrimination, harassment, or any form of abuse will not be tolerated.

- **Child Labour and Forced Labour**

Suppliers must not engage in or tolerate child labor (below 18 Year) not recommended, forced labor, or human trafficking in any form.

- **Freedom of Association**

Suppliers must respect the right of employees to freely associate, organize, and bargain collectively.

- **Wages and Benefits**

Suppliers must pay workers fairly, provide lawful benefits, and comply with wage and hour laws.

- **Working Hours**

Suppliers must comply with applicable laws regarding working hours and overtime compensation.

- **Discrimination:**

A commitment to non-discrimination in hiring, promotion, and training. There should be no discrimination based on race, gender, religion, age, disability, or other characteristics.

- **Disciplinary Practices:**

There should be no harsh or inhumane treatment in the workplace. Disciplinary practices must align with legal standards and be respectful of workers' rights.

- **Management Systems:**

Suppliers must establish a management system that ensures compliance, with regular audits and the ability to address any non-compliance.

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This Supplier Code of Conduct are part of our ongoing commitment to ensuring responsible and sustainable practices in our supply chain.

3. Health and Safety

Suppliers must provide a safe and healthy work environment for all employees, ensuring that their practices comply with applicable health and safety laws.

Suppliers are responsible for preventing work-related injuries and illnesses to ensure that their workplaces are free of hazards.

4. Environmental Responsibility

- **Sustainability**

Suppliers must implement environmentally responsible practices in their operations, including reducing waste, conserving resources, and minimizing pollution.

- **Compliance with Environmental Laws**

Suppliers must adhere to environmental laws and regulations in all regions where they operate and take steps to prevent environmental damage.

5. Ethical Business Practices

- **Anti-Corruption:**

Suppliers must not engage in or tolerate any form of bribery, corruption, or unethical conduct in their business dealings.

- **Fair Competition:**

Suppliers must compete fairly and honestly, avoiding anticompetitive practices.

- **Conflict of Interest:**

Suppliers must avoid any activities that may result in a conflict of interest, both internally and externally.

6. Security & Data Privacy

Suppliers must protect the privacy and confidentiality of personal data of their employees and sensitive data of Pheon Auto Tech Pvt. Ltd. They must comply with data protection laws and implement safeguards to ensure data security.

- **Proper protection of personal Information**

Suppliers shall have the proper organization structure, processes and procedures to ensure the protection of personal information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use or access.

- **Proper Security Measures**

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Suppliers should establish and maintain robust policies and procedures that cover both technical and organizational security measures. These measures should ensure that adequate safeguards are in place to protect data and systems. Additionally, suppliers must take reasonable actions to verify that they are in compliance with these security policies and procedures.

- **Compliance with Cross-Border Transfer Restrictions**

Suppliers must implement appropriate safeguards, rules, and procedures to ensure compliance with all relevant laws and regulations governing cross-border data transfers. These measures should protect data during international transmission and ensure legal compliance across jurisdictions.

7. Reporting Violations

Suppliers are encouraged to report any violations of this Code or unethical behavior. Pheon Group ensures protection for whistle blowers who report in good faith, without fear of retaliation.

8. Monitoring and Audits

Pheon Group reserves the right to conduct audits or assessments to ensure compliance with this Code. Suppliers are expected to cooperate with any such assessments and provide necessary documentation as requested.

9. Consequences of Non-Compliance

Suppliers who violate this Code may face corrective action, which could include termination of contracts or other legal remedies. Pheon Group is committed to working with suppliers to improve compliance, but serious violations will result in consequences.

10. Management Systems

Suppliers (Manufacturers) are required to implement management systems that support continual improvement and meet the specified principles.

- **Commitment and accountability:**

Suppliers must allocate necessary resources and take responsibility for aligning their practices with the outlined standards. Regular evaluations and reporting are required to ensure transparency and compliance.

- **Legal and customer Requirements:**

Suppliers must ensure compliance with all relevant laws, regulations, standards, and customer requirements.

- **Risk Management:**

Suppliers must establish mechanisms to identify and manage risks in all areas covered by this document.

- **Documentation:**

Suppliers shall maintain documentation necessary to validate conformance with these expectations and compliance with applicable regulations.

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- **Training and Competency:**

Suppliers must implement a training program to ensure management and workers acquire the necessary knowledge, skills, and abilities. This program should equip them to meet the specified expectations effectively.

- **Continual Improvement:**

Suppliers must continuously improve by setting performance goals, executing plans, and addressing deficiencies found through assessments, inspections, and reviews. Corrective actions should be taken as needed to meet these objectives.

- **Commitment to Improvement:**

Pheon Group encourages continuous improvement in all aspects of supplier operations, and will work collaboratively with suppliers to promote sustainability, ethical business practices, and responsible sourcing.

11. **Acknowledgment and Compliance:**

By doing business with Pheon Group, suppliers acknowledge that they have read, understood, and agree to comply with this Supplier Code of Conduct.

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Date:

Place:

Signature of Supplier with Name and Company Stamp

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Sec.	Description	Details			
		Particulars		From	Reference
6	Inputs				
7	Outputs				
8	Monitoring & Measurement	Frequency		KPI	Responsibility
9	Revision History	Rev No.	Details of Revision	Date	DCR No.
		00	INITIAL RELEASE	01.09.2025	
		01			
10	Format Usage Related	Format Template Loc.	Not Applicable		
		Document Retention Format	Policies	To be Stamped and Signed by MD and then Retained in PDF Format.	
			Guidelines	Controlled Document to be retained in PDF Format	
		Document Retention Loc.	PAT Systems Data > PAT - Document Resource > Controlled - PAT - Guidelines and Policies > Purchase (P) Related > Controlled G-P-04 - Supplier Code of Conduct Policy		
		Retention Period	Perpetual		
		Circulation	MD, MIS, Group Manager – Purchase & Sourcing		
11	Abbreviations				
12	Document Control	Particulars	Name	Date	Sign
		Prepared By	Raman Singh	01.09.2025	
		Approved By	Gaurav Singhal 	01.09.2025	
		Controlled By	Mayank Mishra	01.09.2025	

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