

SUPPLIER CODE OF CONDUCT

Preamble:

As a responsible corporate, Lakshmi Machine Works Limited (LMW) recognises the need to ensure the presence of a responsible working environment within the Organisation's ecosystem of Direct and Indirect Stakeholders. This includes partners in the supply chain who share a considerable footprint in LMW's product value stream.

This supplier code is applicable to all 'Suppliers' ('Suppliers' herein refers to suppliers / Vendors / contractors / Service providers / third parties) who have Business relationship with 'LMW' (herein refers to the Company and any of its Subsidiaries).

Code of Conduct:

LMW chooses to do Business with suppliers based on their merit, competitive price, quality, ability to incorporate sustainable Business practices and performance. LMW reasonably expects its suppliers to adhere to the following:

Shall ensure compliance with all Governmental norms (both local and international) such as - Environment, Minimum Wages, Child Labour, Anti-Bribery, Corruption Health and Safety etc.

Shall follow all environment, health, safety and other operational policies of the Company while executing the work under this agreement / contract at company site.

Shall not use banned or restricted substances (as defined in applicable legislations) in their processes.

Shall be consistent with the spirit of laws, rules and regulations regarding responsible sourcing and conflict minerals, including those promulgated under applicable international law. LMW supports laws which aim to prevent the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the notified countries and requires its suppliers to engage in due diligence of their supply chains in accordance with an internationally recognized framework, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas and to understand and report the source of the materials constituting their parts supplied to LMW.

Shall not take any recourse to any unethical behaviour (implicit or explicit) with any employee of LMW for the purpose of obtaining Business or divulge or obtain any information that may result in a favourable financial impact more specifically.

Shall not offer or accept bribe or use other means of obtaining undue or improper advantage. No supplier, or its representative or employees, shall offer to any employee of LMW a kickback, favour, gratuity or anything of value to obtain favourable treatment or for the advancement of Business.

Shall not take any advantage of any family / social / political connections in obtaining favours with regard to any order. Merits shall be the sole attribute for association with LMW.

Shall not offer any gift or entertainment for the purpose of obtaining an order for any undue favour.

Shall forthwith report any unethical activity or discrimination if practiced by any LMW employee / other suppliers on violation of rules, anonymous accounting, mail or wire fraud.

Shall desist from unfair trade practices with its competitors who are also associated with LMW.

Shall protect / not infringe with any of LMW's intellectual property / information / technology which the supplier obtains or has access during the course of Business relationship / dealing with LMW.

Policy Dissemination:

LMW's supplier code of conduct will be available on the Company's website. Suitable information regarding its availability shall be suitably communicated by LMW to all its existing and prospective suppliers.

Compliance:

LMW expects its supplier to comply with the conditions of Suppliers code of conduct in Letter and spirit. It is the supplier's responsibility to read and understand the content of LMW's Supplier Code and Code of Conduct and Business Ethics Policy and agree to abide with it during its business association with LMW.

To verify supplier's compliance with this code of conduct, LMW reserves the right to audit and inspect the supplier's operations and facilities, at its own cost and upon reasonable notice, with or without the support of a third party. If the results of such an audit or inspection causes LMW to be of the opinion that the supplier does not comply with LMW's Supplier Code of Conduct, the supplier shall be provided with reasonable time to take necessary corrective actions in a timely manner, as directed by LMW. If the supplier fails to comply with this LMW's Supplier Code of Conduct, then LMW depending upon the gravity of the matter at end reserves the right to take suitable action, including suspending or terminating supplier's activities as one of LMW's suppliers.

LMW may insist with the supplier to provide it with a written confirmation about adherence with this code of conduct.

Revision:

LMW reserves the right to amend the Supplier Code of Conduct with or without notice to its Suppliers.

Any grievances falling under the purview of this policy shall be addressed to Head - SCM, Lakshmi Machine Works Limited, SRK Vidyalaya Post, Perianaickenpalayam, Coimbatore – 641020.