



Excellence in Engineering

WELD-TECH ENGINEERS (I) PVT. LTD.

Code of Ethics and Business Conduct

Company Vision

Our Vision is to have sustainable growth retaining the ethics of the Business.

Company Values

While doing the business, we keep the Integrity, Honesty, Reliability & Fairness to our Customers, Business Partners, Employees, Government and Society.

Company Mission

Our Mission is to understand Client's requirement and deliver on time, with safety and deliver in time with safety and quality. Do the business (Carrying out with Business) without much disturbing the Environment and Mother Nature.

SCOPE FOR ALL WELD-TECH MANAGEMENT AND EMPLOYEES

Scope: Applicable to all Weld-Tech's employees, Contractors, Sub-Contractors and operation, ongoing projects, inside & outside India.

Content

1. Business Philosophy
2. Gifts, Gratuities and Business Courtesies
3. Harassment Policy
4. Implication of Government Policies (Centre/State/Local)
5. Anti-Bribery Policy
6. Anti – Discrimination Policy
7. Alcohol and Drug Policy
8. Accountability

Sr. No	Rev. No	Description	Date	Sign

BUSINESS PHILOSOPHY

The Success or Sustainance of our Business is dependent on the trust and confidence we earn from our clients, Business Partners, Employees and our Share Holders. We retain our values and over the time enhance them to gain credibility from our associates. Periodically we have to access ourselves to have Sustainable Growth.

We all deserve to work in an environment where we are treated with dignity and respect.

We are committed to creating an adapt environment to enhance the full potential in each of us.

We are committed to provide an atmosphere that is free of discrimination of all types such as abusive, offensive or harassing behaviour.

Any employee who feels abused, harassed or discriminated should report the incident to his/her higher authority in line.

All Weld-Tech employees are expected to provide support for following Conduct Standards: -

- Use proper language and Manners (Have adequate etiquettes)
- Treat all the fellow Staff Members / Vendors / Clients / Business Partners with dignity and respect at all times.
- Support and Guide colleagues.
- Report offensive and harassing behaviour of others to higher management.
- Treat all the Genders equally.
- Maintain decorum at Work-Place such as Office / Project Site / Ware-House etc.
- Upgrade with the new Technologies and support colleagues for upgrading them.

B. GIFTS, GRATUITIES AND BUSINESS COURTESIES

Weld-Tech is committed to do its Business solely on the merits of products, quality and services. We will avoid our actions that creates a perception that we are favouring to gain the Business.

We will not treat our Clients / Business Partners by offering gifts, gratuities, meals, refreshments, entertainment, cash. Any personal favours or any other benefits to gather Business. Vice-Versa We will also not accept any gifts, gratuities, meals, refreshments, entertainment, money any personal favours or any other benefits.

We may accept or offer occasional meals, refreshments, entertainment and similar business courtesies such as calendars, diaries etc. with following conditions.

- They are not inappropriately Lavish or excessive.
- The Courtesies are not frequent.
- The Courtesies are not offered in Secretive behaviour.
- The Courtesies should not contradict with other organization's Code of Conduct.
- The Courtesy should not create the appearance of any favour or influence the Business.

GIFTS

Employees may accept unsolicited gifts other than money that confirm to the reasonable ethical practices including: -

- Flowers, Fruit / Chocolate, baskets or other modest presents that goes with special occasion or festivity.

- Gifts of nominal value (less than 100 INR) such as pens, mugs, caps, diaries or any other newly advertising or promotional items which are of not higher value.
- Any Gift / Gratuity received has to be reported to higher management.
- Any Weld-Tech employee offering gifts / courtesy has to take permission from his higher authority.
- Any business courtesy should be consistent with the industry practices. Any deviation from above will be taken seriously which might effect in his / her elimination of services.
- Any tangible gifts (industry) tickets to sporting / environment event that have market value greater than Rs. 100/- may not be accepted unless approved by the management.

C. ACCOUNTABILITY

- At Weld-Tech each of us is responsible for maintaining the values, ethics. Code of Conduct, etc. irrespective of the hierarchy.
- All of us has to understand the standard set by, any confusion to be resolved immediately from higher authority in line.
- Any new employee Joining the Weld-Tech has to read and understand the standards (Ethics / Values) set and adhere to the same.
- Project Managers of respective site has to familiarize our Code of Ethics and business Conduct to our Site team and has to establish Site hierarchy to maintain the same.
- If anything is not understandable He / She can take guidance from higher authority in line or top management at any time.
- If any of us has language barrier than same will be explained in his / her native language.

D. HARASSMENT POLICY

We believe in conducive atmosphere to all for doing work / business at ease.

We will not tolerate any discrimination such as Abusive, Offensive or harassing behaviour.

- Each of us will talk in proper language.
- Each of us will treat all the genders equally.
- We will not behave in a manner which is offensive to our fellow colleagues.
- Any person feeling discriminated, should report to his / her higher authority in line immediately and get the issue resolved. If still the issue is not resolved, he / she can approach higher management.
- Discriminations in any form will be taken seriously which might effect in his / her termination of services.

E. IMPLEMENTATION OF GOVERNMENT POLICIES (CENTRE / STATE / MUNICIPAL)

We at Weld-Tech will make certain that all the disclosures made in public documents such as ESIC, PF, Insurance Policies, Labour License, IBR License, Fire License, etc. and financial reports are full, fair, accurate, timely and understandable.

All the data filled for registration at various places such as Government / State / Municipal Offices, Labour Offices and at client development has to be true and accurate.

No false data has to be submitted to gain any business advantages.

If any-one has submitted wrong data unknowingly then same has to be brought to higher authority in line and same has to be rectified immediately.

No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

All corporate records must be true, accurate, and complete. Company data must be properly created and retained. From time to time records will be disposed of after proper notifications.

We will not create false data to gain shorter business advantages.

F. EHS POLICY

- We are committed to take adequate precaution and action related to Safety, Health & Environment.
- Safety is of our Prime Business Objective. Our aim is to achieve Zero Accident through continuing efforts to enhance Safety & High standards of Health and Environmental protection in the conduit of our business.

We are committed to: -

- Comply with applicable Safety, Health and Environment (SHE) legislation and statutory, regulatory requirements.
- Employee training to ensure competence in work Safety, Health & Environment.
- Respond to concerns regarding SHE and address them proactively in our operation.
- Use Safety Audits, Analysis, Operability Studies and Documentation of SHE related information to minimize SHE hazards associated with our operations.
- Continually review objectives and set targets to improve our SHE Performance and provide organizational directive to achieve these objectives.
- Investigate all events which results in injuries, damage to property or the environment including all near miss incidents.
- The conclusions and recommendations of investigation are communicated in the timely manner to ensure corrective and preventive action.
- Disposal of waste in environmental friendly manner.
- All the Employees have an obligation to follow these principles fully. By doing so, we create a working culture that continuously strives to Improve Performance through regularly setting and reviewing SHE objectives and targets.
- **“SAFETY, HEALTH & ENVIROMENT IS OUR VERY OWN SURVIVIAL AS A BUSINESS.”**

G. QUALITY POLICY

We firmly believe that Trust is a by – Product of Quality. Through the years we have seen Customers patronize Weld-Tech because of their faith and conviction in the quality of our services. In pursuit of excellence, we are committed to providing: -

- Cost Effective Solutions – Offering Premium Quality Services at competitive prices.
- Continual Improvement – By keeping pace with global technological innovations, we are able to upgrade and improve our service offering.
- Customer Satisfaction – Meeting the Expectation of the customer, if not exceeding it, is what drives our work force.
- Consideration of customers' perspective - The art of creating value starts with the ability to see our business through our client's eyes.

H. ANTI-BRIBERY & CORRUPTION POLICY

- We are committed to conducting business in an ethical and honest manner, and are committed to implementing and enforcing systems that ensure all forms of bribery, corruption and fraud are prevented.
- This policy applies to all the employees including managers and owners as per Prevention of Corruption Act of India 1988.
- All our employees must adhere to the company ethos of bribery and corruption. No employee or manager will be allowed to take part or become involved in any form of bribery, corrupt behaviour or fraud including the following: -
 - ❖ Offer, pay or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
 - ❖ Attempt to mislead or induce any person to do something illegal or which goes against the company policy.
 - ❖ Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
 - ❖ Violate any rules by shifting blame or responsibility onto another employee / person.
 - ❖ Fraudulent practices against the company ethos or legislation.
- We are committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers, or customers / clients in any way or form. This policy hereby binds the company to its commitment to regularly discuss and mitigate factors to any form of bribery, corruption or fraudulent behaviour.

For WELD-TECH ENGINEERS (I) PVT. LTD.

SANJAY VISARIA.

Managing Director.

Date:01.04.2017