

Messrs. POLISETTY SOMASUNDARAM

TOBACCO PACKERS & EXPORTERS
(STAR EXPORT HOUSE - RECOGNISED BY GOVERNMENT OF INDIA)

(ISO – 9001 : 2008 CERTIFIED COMPANY)

8-24-31, P.O.BOX No.54, GUNTUR – 522 001. (SOUTH INDIA)



CODE OF CONDUCT

The purpose of this Supplier Code of Conduct is establishing controls to ensure compliance with all applicable laws, rules and legal regulations and to ensure that the business in our supply chain is conducted in a socially, ecologically and economically responsible manner.

I. ETHICAL RESPONSIBILITY

- BUSINESS INTEGRITY / CORRUPTION PREVENTION
- FAIR COMPETITION
- DISCLOSURE OF INFORMATION / PROTECTION OF INTELLECTUAL PROPERTY / PRIVACY.
- CONFLICT MINERALS
- AVOIDANCE OF CONFLICTS OF INTEREST

II. LABOUR AND HUMAN RIGHTS

- CHILD LABOUR AVOIDANCE
- FREELY CHOSEN EMPLOYMENT
- WORKING HOURS, WAGES AND BENEFITS
- FREEDOM OF ASSOCIATION
- ANTIDISCRIMINATION

III. HEALTH AND SAFETY

- QUALITY
- ENVIRONMENT

V. MANAGEMENT COMMITMENT

- COMPLIANCE WITH LAWS, RULES AND LEGAL REGULATIONS REPORTING IRREGULARITIES / CONCERNS

VI. MONITORING, VIOLATIONS AND REVIEW

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SUPPLIER CODE OF CONDUCT

1. PURPOSE

The purpose of this Supplier Code of Conduct is to establish controls to ensure compliance with all applicable laws, rules and legal regulations and to ensure that the business in our supply chain is conducted in a socially, ecologically and economically responsible manner.

Therefore, every PSS employee undertakes to abide by statutory regulations, the PSS Code of Conduct and the Anti-Bribery and Anti-Corruption Guidelines, which provide more details regarding ethical business conduct and compliance with the law as requested in the Organizational Regulations of PSS Holding AG as well as the Organizational Regulations for the Executive Management of the PSS GROUP.

2. POLICY STATEMENT

PSS is guided by the principles of sustainability. To fulfill our responsibility toward future generations, we ensure that our products and business processes are sustainable in environmental, economic and social terms, and are always consistent with state-of-the-art technology.

We have aligned our strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals. Therefore this Supplier Code of Conduct is in full compliance with the basic principles by the UN Global Compact platform.

PSS expects all its suppliers and subcontractors to share the principles which are consistent with PSS's company values and expressed in this Supplier Code of Conduct and that comprise an important component of supplier selection and evaluation. Moreover, we expect our suppliers to replicate these standards further down the supply chain.

In general our policy is that suppliers must be selected solely on the basis of objective criteria after comparing price, quality, performance and suitability. Agreements with suppliers must be made in a clear and distinct form, and must be documented together with subsequent amendments and supplements.

This Code goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

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3. SCOPE

3.1 WHO IS COVERED BY THE GUIDELINES?

This Supplier Code applies to our suppliers and their subsidiaries, affiliates, and subcontractors, consultants, vendors, brokers, merchants, dealers, contractors, agents and other providing goods and services to PSS worldwide. (Hereinafter referred to as “Supplier”).

3.2 WHAT IS INCLUDED?

Our Principles:

- Ethical Responsibility
- Labour and Human Rights Health and Safety
- Quality and Environment
- Management Commitment

4. ETHICAL RESPONSIBILITY

It is our code to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations. Ethical requirements include the following aspects:

4.1 BUSINESS INTEGRITY / CORRUPTION PREVENTION

Suppliers are expected not to practice or tolerate any form of corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Our detailed requirements are regulated in the PSS Anti-Bribery and Anti-Corruption Guidelines.

4.2 FAIR COMPETITION

PSS respects fair competition. The company complies with current laws protecting and promoting competition, particularly current antitrust laws and other laws regulating competition. In competing for market share, PSS is guided by the need to act with integrity. Suppliers will conduct accordingly their business in line with fair competition and in accordance with all applicable anti-trust laws.

4.3 DISCLOSURE OF INFORMATION / PROTECTION OF INTELLECTUAL PROPERTY PRIVACY

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. This obligation to maintain confidentiality also applies after termination of the business relationship.

4.4 CONFLICT MINERALS

Suppliers are expected to take reasonable efforts to avoid that in their products supplied to PSS do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

4.5 AVOIDANCE OF CONFLICTS OF INTEREST

We expect from our suppliers to avoid all conflicts of interest that may adversely influence business relationship.

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5. LABOUR AND HUMAN RIGHTS

PSS treats its employees fairly and openly. In line with the PSS Identity and the Corporate Culture the Group expects all employees to be objective, courteous and fair in their dealings with colleagues, employees, and third parties. PSS believes all workers in our supply chain deserve a fair and ethical workplace. Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect.

5.1 CHILD LABOUR AVOIDANCE

Suppliers should avoid any sort of child labour in their business operations consistent with the ILO's2 (International Labour Organization) core labour standards and the United Nations Global Compact principles. That means supplier shall employ only workers with a minimum age of 15 or the applicable minimum legal age, whichever is higher.

5.2 FREELY CHOSEN EMPLOYMENT

Suppliers will not utilize forced, bonded or indentured labour or involuntary prison labour.

5.3 WORKING HOURS, WAGES AND BENEFITS

Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary. Supplier shall ensure that all workers receive a fair remuneration and to guarantee the applicable national statutory minimum wage.

5.4 FREEDOM OF ASSOCIATION

Supplier respects their employees' right to freedom of association under current laws as well as to bargain collectively.

5.5 ANTIDISCRIMINATION

Supplier shall not discriminate against any worker based on gender, race, disability, ethnic or cultural origin, religion, belief, age or sexual orientation.

6. HEALTH AND SAFETY

Suppliers ensure the safety of all employees in the workplace and offer a working environment conducive to health that supports accident prevention and minimizes exposure to health risks to the Supplier's employees. When hazards cannot be completely avoided, suppliers will provide employees with appropriate personal protective equipment.

Therefore suppliers will have an appropriate Occupational Health and Safety Management Systems in place. Workers shall be provided with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

7. QUALITY AND ENVIRONMENT

7.1 QUALITY

We meet our customers' high expectations in terms of quality and safety. The ZERO DEFECT strategy is an integrated part of PSS Production System (IPS). It is one element of our Total-Quality-Management (TQM) implementation. Our customers should have no trouble during the estimate phase, the order fulfillment and the use of our products and services.

Suppliers will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that without exception meet PSS's needs, perform as warranted and are safe for their intended use.

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7.2 ENVIRONMENT

The Supplier will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible. Supplier shall develop, implement, and maintain environmentally responsible business practices. The aim is to minimize environmental impacts and continually to improve environmental protection by setting up or use an environmental management system.

8. MANAGEMENT COMMITMENT

Suppliers are encouraged to fulfill the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources.

8.1 COMPLIANCE WITH LAWS, RULES AND LEGAL REGULATIONS

The Supplier will comply with any and all applicable laws, rules and legal regulations in the countries in which it operates and will maintain a system to monitor compliance with such laws, rules and legal regulations.


8.2 REPORTING IRREGULARITIES / CONCERNS

Supplier shall provide means for all employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such report, if necessary, remedial measures will be taken.

MONITORING, VIOLATIONS AND REVIEW

PSS will assess its suppliers' compliance with this Code, and any violations of this Code may jeopardize the supplier's business relationship with PSS, up to and including termination. In suspicious cases PSS has the right to ask for an audit.

PSS reserves the right to reasonably change the requirements of this Supplier Code of Conduct due to changes of the PSS Compliance Program. In such event PSS expects the supplier to accept such reasonable changes.



P.SHYAM SUNDAR

Chairman & Managing Director