

ESG POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we believe that long-term business success depends not only on operational excellence but also on how responsibly we manage our environmental impact, treat people, and uphold ethical standards. This ESG Policy outlines our sustainable business commitments and provides a framework for action across operations, supply chain, and stakeholder relationships.

2. Scope

This policy applies to:

- All employees, departments, and leadership teams
- All operational units including die casting, machining, assembly, packaging, and logistics
- All suppliers, contractors, and business partners engaged by Nirotech

3. ESG Commitments

Environmental (E)

We are committed to minimizing our environmental footprint through:

-Reducing energy consumption by 10% by FY 2027-28	Scope-2
-Meeting 10% of total energy needs from renewable sources by FY 2027-28	Scope-2
-Procuring 20% green energy from government sources by FY 2029-30	Scope-2
-Tracking year-on-year CO ₂ reduction and energy intensity per unit output	-
-Conducting energy and environmental audits every three years	-
-Promoting waste recycling, water reuse, and proper disposal of hazardous materials	-
-Reduce GHG Emissions by 10% by FY 2027-28	Scope-1, Scope- 2 & Scope-3

Social (S)

We foster a safe, inclusive, and empowering workplace, and support our surrounding communities:

- No child labour, forced labour, or discrimination is tolerated
- Maintain **100% POSH compliance** and high EHS standards
- We are committed to providing an ergonomically sound and safe work environment that supports employee health, comfort, and productivity.

- Ensure **100% of staff receive safety and skill development training** annually
- Target **1% women in production roles by FY 2028-29**
- Support CSR projects in education, health, skill development, and rural upliftment

Governance (G)

We uphold the highest standards of integrity, transparency, and accountability:

- Enforce **Code of Conduct, Anti-Bribery Policy, and Whistleblower Protection**
- Ensure **data privacy**, legal compliance, and transparent reporting
- ESG oversight is part of **quarterly Management Review Meetings (MRMs)**
- ESG KPIs are embedded into management performance reviews

4. ESG Leadership & Oversight

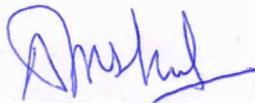
- Our **Corporate Sustainability Officer**, serves as the designated **ESG SPOC**
- He is responsible for coordinating ESG initiatives, reporting progress, and driving continuous improvement
- ESG performance is reviewed quarterly and included in **KPI dashboards** of relevant department heads

5. Stakeholder Engagement & Compliance

- Vendors and suppliers must adhere to Nirotech's **Supplier Code of Ethics** and ESG expectations
- Customers, auditors, and community partners are engaged through regular dialogue and site audits annually.
- ESG summaries are made available on our website www.nirotechindia.co.in

6. Policy Review

This policy is reviewed **annually** and updated based on legal changes, ESG trends, or feedback from stakeholders. Oversight rests with the ESG Committee under the leadership of the Sustainability Officer.



Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd

WATER MANAGEMENT POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we recognize that water is a vital and limited natural resource. This policy outlines our commitment to the sustainable use, conservation, and protection of water resources across all our operations. It supports our ESG goals to minimize environmental impact and contribute to India's water stewardship goals.

2. Scope

This policy applies to:

- Manufacturing facility of Nirotech Industries at Plot No. 120,121,130,131 Huda Industrial Estate Part 2, Sector 59, Faridabad, Haryana - 121004
- All processes that involve water use: die casting, machining, washing, cooling, and sanitation.
- Employees, facility teams, suppliers, and contractors working within our premises.

3. Policy Objectives

Nirotech aims to:

- Reduce overall freshwater consumption per unit of production.
- Implement water-efficient technologies and process optimization.
- Reuse and recycle water wherever technically and economically feasible.
- Eliminate water pollution and comply with all regulatory discharge norms.
- Educate and engage employees in responsible water usage.
- Support long-term water security through conservation initiatives.

4. Commitments

❖ Water Usage Optimization

- Conduct **annual water audits** to identify inefficiencies and leakages
- Install **flow meters** on key water-consuming equipment and utilities
- Track **water usage per ton of production** as a KPI
- Aim to reduce water consumption by **5% by FY 2027–28 with respect to the previous financial year.**



❖ Water Recycling & Reuse

- Maintain **Effluent Treatment Plants (ETP)** and implement **Zero Liquid Discharge (ZLD)** systems by FY 2029-30 (ZLD target year?)
- Reuse treated water for **toilet flushing, gardening, and cooling**
- Explore **closed-loop cooling systems** to reduce process water loss

❖ Rainwater Harvesting

- Install or maintain **rainwater harvesting systems** at plant sites
- Use harvested water to recharge groundwater or for non-potable uses
- Comply with local municipal mandates on water harvesting infrastructure

❖ Pollution Prevention

- Prevent contamination of freshwater through proper storage of chemicals and lubricants
- Ensure **zero untreated effluent discharge**
- Conduct regular testing of water quality and effluent before discharge

5. Training & Awareness

- All employees will be trained annually on **water conservation best practices**
- Signage, posters, and water meters will be used to build daily awareness
- Facility heads will be accountable for department-level water initiatives

6. Supply Chain Responsibility

- Encourage key suppliers and service providers to adopt **water-efficient practices**
- Incorporate **water-related questions into supplier ESG self-assessments**
- Prefer vendors who comply with local water laws and have internal conservation measures

7. Monitoring & Reporting

- Water data will be tracked monthly and reviewed in **Management Review Meetings (MRMs)**
- Annual sustainability reports will include **water usage trends, reduction progress, and recycling metrics**
- Any incidents of water wastage, leakage, or pollution will be recorded, investigated, and rectified

8. Compliance & Review

- The company complies with all **Central and State Pollution Control Board** norms related to water use and discharge
- The **Sustainability Officer** will oversee this policy's implementation and progress
- This policy will be **reviewed annually** to incorporate best practices and regulatory changes

Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

CLIMATE POLICY

1. Purpose

Nirotech Industries Pvt. Ltd. (“Nirotech”) acknowledges climate change as a critical global challenge and is committed to responsible business practices that minimize our environmental footprint. This policy outlines our efforts to measure, manage, and reduce greenhouse gas emissions and foster climate resilience across our operations and supply chain.

2. Scope

This policy applies to:

- All operations, including die casting, machining, assembly, and support services.
- All employees, contractors, and management.
- Supply chain partners, whom we encourage to adopt climate-conscious practices.

3. Our Commitments

Nirotech is committed to:

- Tracking and reducing **Scope 1 and Scope 2 greenhouse gas emissions** annually.
- Improving **energy efficiency** across all facilities.
- Reducing climate risks through **sustainable manufacturing and resource optimization**.
- Educating and involving employees in sustainability initiatives.
- Encouraging **climate action from suppliers and partners**.
- Ensuring compliance with Indian environmental laws and global ESG expectations

4. Climate Targets and Roadmap

We are setting the following climate-related goals:

- **By FY 2027–28:**
 - Implement energy reduction projects to save **10%** of current energy use
- **By FY 2027–28:**
 - Install solar panels or other renewable systems to meet **10% of total energy consumption**
 - Procure energy-efficient machinery and reduce energy use by an additional **10%**
- **By FY 2029–30:**



- Procure **20% of total energy** from government-approved **green energy sources**

These targets will be reviewed annually, and progress will be tracked through internal energy and emissions dashboards.

5. Energy & Emissions Management

Nirotech will:

- Conduct **energy audits in every 03 year.**
- Replace outdated systems with **energy-efficient equipment**
- Monitor energy usage monthly per production unit
- Install smart meters for real-time power monitoring
- Encourage solar installations wherever feasible at plant level

6. Transportation & Logistics

To reduce Scope 3 emissions:

- Optimize logistics and transportation routes
- Encourage EVs, public transport, or carpooling for employees
- Prefer vendors practicing low-emission logistics

7. Climate Risk & Resilience

- Identify physical and transition climate risks
- Integrate **resilience planning** into operations and future investments
- Consider energy and emissions criteria in procurement and expansion decisions

8. Monitoring & Reporting

- **Scope 1 and Scope 2 emissions will be reported annually**
- Internal dashboards and energy scorecards will be used to monitor targets
- Key metrics will be reviewed quarterly by senior management
- This policy will be reviewed and updated **once every year**

9. Awareness & Stakeholder Engagement

- Conduct awareness sessions for employees on energy-saving practices

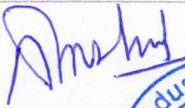


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- Promote green behaviours such as turning off idle equipment, air compressor management, etc.
 - Collaborate with customers and suppliers on sustainable product design and manufacturing
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10. Leadership Commitment

Nirotech is committed to supporting India's climate goals and the **Paris Agreement**, and to doing our part in limiting global warming to below 1.5°C.



Approved By:

Mr. Anshul Ray



Director, Nirotech Industries Pvt. Ltd.

HUMAN RIGHTS POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we are committed to respecting, protecting, and advancing human rights across all areas of our business. This policy sets forth our principles and approach to safeguarding human rights in accordance with international standards, national legislation, and the expectations of our stakeholders. It is rooted in:

- The **Universal Declaration of Human Rights (UDHR)**
- The **United Nations Guiding Principles on Business and Human Rights (UNGPs)**
- The **International Labour Organization (ILO) Core Conventions**
- The **Indian Constitution and Labour Laws**

Our aim is to foster an inclusive, dignified, and ethical workplace, while influencing positive human rights practices throughout our supply chain.

2. Scope

This policy applies to:

- All Nirotech employees: permanent, contractual, temporary, and apprentices
- Directors, management, and operational teams
- Contract labour, interns, and third-party workers on our premises
- Suppliers, vendors, business partners, and service providers
- Community members in areas where Nirotech has a business presence

3. Key Human Rights Principles & Commitments

No Child Labour

- Nirotech prohibits the employment of anyone under the age of 18
- Age is verified through **government-issued documents** during recruitment.
- We comply fully with the **Child and Adolescent Labour (Prohibition and Regulation) Act, 1986**, as amended.

No Forced or Compulsory Labour

- All employment is **voluntary**.
- Nirotech does not permit bonded labour, indentured labour, or forced overtime.
- Workers' identity documents / original documents are never withheld.



Safe and Healthy Workplace

- Nirotech provides a work environment that is free from harm, harassment, or abuse.
- Occupational health and safety are ensured through compliance with EHS standards.
- All employees receive **mandatory safety and POSH training** annually.

Freedom of Association & Collective Bargaining

- Employees have the right to join or form unions, worker committees, or lawful associations of their choosing.
- We respect the right to **collective bargaining** in accordance with Indian law.

Non-Discrimination and Equal Opportunity

- Nirotech maintains a strict policy of **non-discrimination**.
- We do not tolerate discrimination based on gender, caste, religion, disability, age, sexual orientation, marital status, or socioeconomic background.
- Employment decisions are based on merit, qualifications, and job relevance.

Minimum Wage and Working Hours

- Wages comply with or exceed **minimum wage laws** and are paid on time.
- All employees are entitled to **leave, rest periods, and regulated working hours** under applicable law.
- Overtime is voluntary and compensated appropriately.
- **Internal Wage Benchmarking**
 - Conduct **market wage benchmarking** at least once every 2 years to compare against industry averages.
 - Ensure wages for entry-level roles are at or above industry medians, especially in production and contract roles.
- **Transparent Payroll & Payslips**
 - Issue **payslips** to 100% of employees, showing gross wage, deductions, and net pay.
 - Maintain digital records of salary disbursement, with **bank transfer proofs**.
- **Third-Party Wage Audits**
 - Engage independent or internal auditors annually to verify:
 - Wage compliance (actual vs. statutory)
 - Payment timelines
 - Accuracy of deductions and benefits
- **Grievance Mechanism**
 - Employees can raise wage related concerns to compliance@nirotechindia.co.in or call at +91 8588829048
 - Resolve all wage grievances within **15 working days**.
- **Contractor Wage Oversight**
 - Collect and review monthly wage sheets and payment records from manpower agencies or third-party contractors.
 - Ensure full compliance with labour laws for indirect workers

Right to Privacy and Respect

- Nirotech respects the privacy and dignity of all individuals.
- Personal data is handled in accordance with Indian data protection laws and confidentiality standards.

4. Due Diligence and Risk Management

To uphold our human rights commitments:

- We conduct **human rights due diligence** across operations and major suppliers.
- We assess risks related to child labour, forced labour, discrimination, and unsafe conditions.
- Supplier audits, declarations, and third-party assessments may be used to validate compliance.
- Contracts with vendors include clauses on human rights compliance and enforcement.

5. Grievance Mechanism

- All employees, workers, and third parties can report human rights concerns through:
 - **Email:** info@nirotechindia.co.in or compliance@nirotechindia.co.in
 - HR Department or designated grievance committee
- Anonymous physical **grievance dropboxes** located at PDC shopfloor entrance near gate number 1.
- **Opening Frequency:** The physical dropbox shall be opened **once every 30 days (monthly)** to ensure timely review and response to complaints. The dropbox will be jointly managed by the **HR Manager** and the **Compliance Officer**. Both individuals must be present when opening the box to ensure transparency and dual custody.
- **Record Keeping:** Each dropbox opening must be recorded in a **confidential logbook**, including date of access, number of complaints received, and action taken (if applicable).
- Reports are reviewed confidentially within **3 working days** and investigated within **15 working days**.
- Nirotech follows a **zero-retaliation** approach for whistleblowers and complainants acting in good faith.

6. Training and Awareness

- Annual training sessions are conducted for all staff on **human rights, labour rights, anti-harassment, and ethical conduct**.
- Induction training includes human rights orientation for new employees.

- Posters and internal campaigns on rights and responsibilities are displayed in key locations in regional languages.

7. Supply Chain Expectations

- All vendors must acknowledge and comply with Nirotech's human rights requirements.
- We expect suppliers to:
 - Avoid child and forced labour
 - Ensure non-discriminatory hiring
 - Provide safe working conditions
 - Enable grievance redress mechanisms
- Periodic assessments and self-audits may be required for high-risk categories.

8. Monitoring, Reporting & Review

- Human rights compliance is monitored by the **Sustainability Officer** and the HR team.
- Metrics such as training completion, grievances, child labour audits, and supplier declarations are tracked.
- The **policy is reviewed annually** during the **Management Review Meeting (MRM)** and updated as necessary.
- Any identified violations or incidents are recorded and reported in internal ESG reports.



Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

DIVERSITY, EQUITY AND INCLUSION POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we believe that a diverse, inclusive, and equitable workplace drives innovation, fosters creativity, enhances employee engagement, and strengthens performance. This policy sets out our commitment to ensuring that every individual — regardless of background — has equal opportunity, voice, and dignity within our organization.

2. Scope

This policy applies to:

- All employees, contractors, interns, and trainees of Nirotech
- All company locations, business functions, and teams
- All processes, including recruitment, promotion, learning, compensation, and termination

3. Our DEI Commitments

❖ Diversity

We strive to create a workforce that reflects a wide range of identities, experiences, and perspectives. This includes diversity in:

- Gender
- Caste and ethnicity
- Religion
- Age
- Disability
- Sexual orientation
- Educational and economic background

❖ Equity

We ensure fair treatment, access, and advancement for all individuals. We will:

- Remove systemic barriers and biases from our people processes
- Offer additional support to underrepresented or disadvantaged groups
- Promote equitable opportunities for development and leadership

❖ Inclusion

We cultivate a respectful, supportive work culture where everyone feels welcome, heard, and empowered. We will:

- Celebrate cultural and personal milestones (festivals, heritage days, etc.)
- Conduct regular training on inclusive behaviour and unconscious bias

- Encourage open dialogue and safe spaces for feedback and collaboration

4. Implementation Strategies

❖ Hiring & Recruitment

- Ensure non-discriminatory hiring practices and diverse candidate slates
- Explore outreach to women engineers, technical institutes, and vocational schools
- Track gender and social representation in hiring

❖ Training & Awareness

- Conduct annual training on unconscious bias, inclusive communication, and respect in the workplace
- Educate line managers on inclusive leadership

❖ Facilities & Accessibility

- Improve physical accessibility for differently-abled individuals at both plant and office
- Ensure equitable policies on maternity leave, parental leave, and menstrual hygiene

❖ Grievance Redressal

- Ensure that all discrimination complaints are confidentially addressed through the POSH & HR grievance mechanism
- No retaliation will be tolerated against any person who raises DEI concerns in good faith

5. Monitoring and Measurement

- Track and report gender ratio, new hire diversity, and promotion rates annually
- Set internal targets (e.g., **minimum 1% women in production roles by FY 2028–29**)
- Conduct anonymous DEI pulse surveys for feedback from employees
- Include DEI KPIs in **Management Review Meetings (MRM)**

6. Communication

- This policy is communicated to all employees and made available in multiple languages where required
- It is displayed at all locations and included in induction and employee handbooks
- The DEI policy forms a part of our **ESG reporting** and customer code of conduct alignment

Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



CHILD LABOUR POLICY

1. Purpose

Nirotech Industries Pvt. Ltd. ("Nirotech") is firmly committed to the elimination and prevention of child labour in all areas of its operations and supply chain. We comply with the **Child and Adolescent Labour (Prohibition and Regulation) Act, 1986** (amended in 2016), as well as international frameworks such as the **ILO Conventions 138 and 182**, and the **United Nations Global Compact**.

2. Scope

This policy applies to:

- All Nirotech employees (permanent, temporary, contractual, or part-time)
- Workers employed by contractors, subcontractors, suppliers, or service providers
- All Nirotech facilities, warehouses, production units, and administrative offices
- Any third-party worksite where Nirotech exercises operational control

3. Policy Statement

Nirotech maintains a **zero-tolerance policy** toward the use of child labour. Specifically:

- We do **not employ children under the age of 18** in any capacity.
- We do **not employ adolescents (below 18 years)** in any **hazardous processes or occupations** as defined by Indian law.
- We expect the same standards from all our contractors, vendors, suppliers, and business partners.

4. Verification and Implementation

To ensure strict compliance:

- **Age verification is mandatory** at the time of hiring. The following **government-issued identity documents** (minimum three) must be submitted to confirm age:
 - Aadhaar Card
 - PAN Card
 - Voter ID
 - Passport
 - Driving License
 - Birth Certificate (if available)
- A copy of the verified document is securely stored in the personnel record.
- HR conducts periodic **audits** of employee records to verify compliance.
- All suppliers and contractors must sign a **Declaration of Compliance** with this policy and provide documentation of age verification for their workers if requested.

5. Supply Chain Due Diligence

We expect all our business partners to uphold the same commitment.

- Nirotech may conduct **unannounced audits** at supplier and contractor facilities.
- If any case of child labour is discovered, the relationship will be immediately reviewed.
- Non-compliance may result in the **termination of the contract** and escalation to relevant authorities.

6. Remediation and Rehabilitation

If child labour is identified:

- The child will be immediately withdrawn from the work environment.
- The case will be reported to **local child protection authorities or NGOs**.
- Nirotech will actively assist in providing **access to education or rehabilitation support** through suitable external partners.

7. Training and Awareness

- The HR team is trained to recognize and prevent child labour risks.
- All hiring and contracting teams are briefed on this policy.
- Awareness posters are displayed prominently at factory and office locations.
- Periodic awareness sessions will be conducted for employees and suppliers.

8. Monitoring and Review

This policy is reviewed at least once annually or whenever there is a change in applicable law or industry standards. Oversight lies with the HR and Compliance Teams.

Approved By:

Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



CARBON NEUTRALITY STATEMENT

At Nirotech Industries Pvt. Ltd., we are committed to achieving carbon neutrality for our Scope 1 and 2 emissions by 2035 and Scope 3 emissions by 2050. As a responsible manufacturer of high-pressure aluminium die casting and machined components, we are actively reducing emissions through energy efficiency, renewable energy, and supply chain collaboration. We will transparently share our annual progress and carbon footprint data on our website as part of our ongoing sustainability journey.

Approved By

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

ANTI – DISCRIMINATION POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we are committed to creating a workplace that promotes fairness, dignity, and respect for all. This policy outlines our stance against discrimination and our commitment to providing equal opportunities in all aspects of employment, irrespective of identity, background, or beliefs.

2. Scope

This policy applies to:

- All full-time, part-time, contractual, and temporary employees
- All departments, locations, and business units of Nirotech
- All HR processes including recruitment, promotions, compensation, transfers, and training
- Contractors, vendors, service providers, and any third party engaged in workplace activities

3. Non-Discrimination Commitment

Nirotech prohibits all forms of discrimination and harassment. This includes—but is not limited to—discrimination based on:

- Gender
- Caste or tribe
- Religion or faith
- Marital status
- Sexual orientation
- Age
- Disability or physical appearance
- Socioeconomic background
- Pregnancy or maternity
- Nationality or place of origin

Every employee is entitled to **equal treatment**, respect, and access to opportunities regardless of personal identity or background.



4. Equal Opportunity in Practice

Nirotech ensures that:

- **Recruitment and hiring decisions** are made solely on qualifications, merit, and job fit
- **Promotions, appraisals, and rewards** are free from bias and based on performance
- **Workplace assignments and responsibilities** are allocated fairly
- **Training and development programs** are equally accessible to all
- **Pay parity** is maintained across equivalent roles and performance levels

We actively monitor our processes to remove systemic barriers and eliminate unconscious bias.

5. Reasonable Accommodation for Persons with Disabilities

- Nirotech is committed to making the workplace accessible for employees with disabilities
- Modifications in tools, processes, and workstations are provided wherever feasible to ensure equity
- Hiring panels and managers are sensitized on inclusive practices
- The company complies with the **Rights of Persons with Disabilities Act, 2016**

6. Harassment-Free Workplace

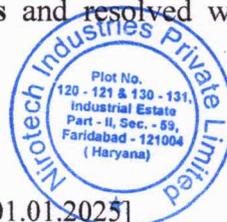
- Discrimination and harassment, including sexual harassment, verbal abuse, or exclusionary behaviour, are not tolerated
- All employees are covered under the **POSH Policy** (Prevention of Sexual Harassment)
- Training sessions are conducted annually to reinforce respectful workplace conduct

7. Reporting Discrimination

Employees are encouraged to report any incident of discrimination, bias, or harassment. Reports may be made to:

- **Email:** info@nirotechindia.co.in
- HR Department or designated grievance officer
- Anonymous feedback box (if applicable)

Complaints will be addressed with **confidentiality**, **fairness**, and **without retaliation**. All complaints are reviewed within **3 working days** and resolved within **15 working days**, wherever possible.



8. Responsibilities

Employees must:

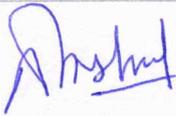
- Treat colleagues with respect and dignity
- Avoid all forms of prejudice, bias, or exclusion
- Report any observed or experienced discrimination

Managers must:

- Uphold and enforce this policy in all decision-making
 - Address complaints promptly and fairly
 - Encourage diversity in hiring, team assignments, and development
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9. Monitoring and Review

- Diversity metrics such as **diversity ratio**, **promotion equity**, and **training participation** are tracked annually
 - Results are reviewed during **Management Review Meetings (MRMs)**
 - This policy is reviewed every year by the HR team in collaboration with the **Sustainability Officer**
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Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

ANTI-BRIBERY OR ANTI-CORRUPTION POLICY

1. Purpose

Nirotech Industries Private Limited (“Nirotech”) is committed to conducting business with the highest level of integrity, transparency, and accountability. This policy outlines our zero-tolerance stance on bribery and corruption in all forms and ensures compliance with applicable Indian laws (such as the Prevention of Corruption Act, 1988) and international standards.

2. Scope

This policy applies to:

- All Nirotech employees, directors, and officers
- Contractors, agents, consultants, and any third parties acting on behalf of Nirotech

3. What Is Bribery?

Bribery is the offering, promising, giving, or receiving of anything of value—monetary or otherwise—to improperly influence decisions or gain an unfair business advantage. Examples include:

- Offering money or gifts to a public official
- Providing hospitality to secure a contract
- Accepting personal benefits in exchange for business favours

4. Prohibited Conduct

Nirotech strictly prohibits:

- Bribes or facilitation payments in any form
- Using third parties to engage in bribery or corrupt acts
- Any form of gift, hospitality, entertainment, or sponsorship intended to influence decisions
- Political or charitable contributions made with the intent of securing a business advantage



5. Gifts and Hospitality

Nirotech maintains a strict **no gifts, no hospitality** policy. We believe that even the appearance of impropriety can undermine trust and transparency.

- Employees and third parties acting on behalf of Nirotech **must not offer, give, solicit, or accept** any gifts, hospitality, or entertainment—regardless of value—from any customer, supplier, government official, or business partner.
- This prohibition applies at all times, including during festivals, holidays, or business milestones.
- Any attempt to offer gifts or hospitality must be **immediately reported** to the Compliance Officer.

Exception: Only low-value, Nirotech-branded promotional items (e.g., pens, calendars) given publicly without targeting any specific individual may be distributed.

6. Roles and Responsibilities

- **Employees** must comply with this policy, complete mandatory training, and report any concerns.
- **Managers and Directors** must lead by example and ensure policy implementation.
- **Vendors and third parties** must acknowledge and adhere to this policy through contractual obligations.

7. Reporting & Whistleblower Protection

Suspected or actual bribery should be reported through:

- **Email:** info@nirotechindia.co.in or compliance@nirotechindia.co.in
- **Mobile:** +91 8588829026
- **In person:** to HR or the Compliance Officer

All reports are treated confidentially. Whistleblowers acting in good faith will be protected from any form of retaliation.

8. Monitoring & Review

- This policy will be reviewed annually or sooner if required by law.
- Nirotech conducts regular internal trainings, audits and risk assessments.
- Anti-bribery training is mandatory for relevant staff on an annual basis.



9. Prevention Measures

Nirotech Industries Pvt. Ltd. adopts the following measurable controls to prevent bribery and corruption:

- **Annual Training Coverage:** All employees in Procurement, Sales, Finance, and Management roles must complete an anti-bribery and ethics training module annually. Completion rates will be tracked and reported to HR.
- **Annual Gift & Hospitality Audits:** A central register is maintained for all declared gifts or entertainment. It is reviewed annually by the Compliance team and escalated if thresholds are exceeded.
- **Segregation of Duties:** All purchase orders above ₹50,000 must be approved by two independent personnel — typically from Procurement, COO, Finance or Top Management— to ensure accountability.
- **Whistleblower Case Review Within 7 Days:** All bribery-related complaints received via info@nirotechindia.co.in or compliance@nirotechindia.co.in will be reviewed within **7 working days**, and closure targeted within **15 working days**.
- **Annual Compliance Audit:** An internal audit will be conducted once a year to assess anti-bribery compliance, including a sample check of 10% of purchase and vendor records.

Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

ENVIRONMENT, HEALTH & SAFETY (EHS) POLICY

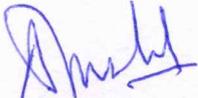
NIPL committed to providing a Safe, Healthy, Clean & Green Environment through continual improvement of our Environmental, Health & Safety performance by:

- Compliance to applicable legal, regulatory & other applicable requirements,
- Conserving resources like Water, Power and Waste Reduction.
- Prevention of pollution, injury and ill health
- Ensure consultation and participation of Workers
- Policy will also be made available and communicated to Interested Parties at their request,
- Enhance awareness about Environmental, Health and Safety through providing training and employee involvement
- NIPL is committed to the continual improvement of its EHS performance.

पर्यावरण, स्वास्थ्य एवं सुरक्षा (ईएचएस) नीति

NIPL हमारे पर्यावरणस्वास्थ्य और सुरक्षा प्रदर्शन में निरंतर सुधार के माध्यम से एक सुरक्षित, स्वस्थ, स्वच्छ और हरित वातावरण प्रदान करने के लिए प्रतिबद्ध है:

- लागू कानूनी, विनियामक और अन्य लागू आवश्यकताओं का अनुपालन,
- जल, बिजली और अपशिष्ट न्यूनीकरण जैसे संसाधनों का संरक्षण
- प्रदूषण, चोट और खराब स्वास्थ्य की रोकथाम
- श्रमिकों का परामर्श और भागीदारी सुनिश्चित करना
- इच्छुक पार्टियों को उनके अनुरोध पर पॉलिसी भी उपलब्ध कराई जाएगी और सूचित किया जाएगा
- प्रशिक्षण और कर्मचारी भागीदारी प्रदान करके पर्यावरण, स्वास्थ्य और सुरक्षा के बारे में जागरूकता बढ़ाना
- NIPL अपने EHS प्रदर्शन में निरंतर सुधार के लिए प्रतिबद्ध है



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



ENERGY POLICY

1. Purpose

As an environmentally responsible manufacturer, Nirotech Industries Pvt. Ltd. is committed to minimizing energy consumption, reducing carbon footprint, and improving energy efficiency across all operations. This Energy Policy supports our goals under sustainability, cost-effectiveness, and continuous improvement, and aligns with our broader ESG commitments.

2. Scope

This policy applies to:

- All plants, offices, and units operated by Nirotech (Plot No. 120-121 & 130-131, Industrial Estate, Part-II, Sector-59, Faridabad, Haryana.)
- All employees, contractors, energy equipment, and processes
- Suppliers and partners engaged in energy-intensive services

3. Energy Commitments

Nirotech is committed to:

- **Reducing total energy consumption by 10%** by FY 2027–28 through process optimization and efficient technologies
- **Implementing energy-saving projects** such as LED lighting, VFDs, energy-efficient motors, and power factor correction
- **Using renewable energy sources** to meet at least **10% of total energy needs by FY 2027–28** (e.g., rooftop solar installations)
- **Procuring 10% of green energy from government sources by FY 2029–30**
- Ensuring **100% metering of high-consumption machines** for real-time energy monitoring
- Conducting **energy audits** every three years and implementing audit recommendations
- Reduce GHG Emissions by **10% by FY 2027-28.**

4. Implementation Approach

- **Energy Monitoring:**
 - Install energy meters on critical machines and utilities
 - Monitor monthly energy use per production unit and set benchmarks
 - Analyze energy use trends for abnormal spikes
- **Technology & Equipment:**
 - Prioritize energy-efficient equipment during procurement



-
- Replace outdated or inefficient systems with high-efficiency alternatives
 - Upgrade compressors, chillers, motors, and lighting for energy savings
 - **Employee Involvement:**
 - Train staff on energy-saving practices such as switching off idle machines, leak detection, and compressor management
 - Reward energy-saving suggestions through internal recognition programs
 - Display awareness posters and dashboards in all departments



Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

INFORMATION SECURITY POLICY

1. Purpose

This Information Security Policy establishes Nirotech Industries Pvt. Ltd.'s commitment to protecting all critical and confidential business-information, including customer data, intellectual property, and internal communications. The policy ensures the availability, confidentiality, and integrity of data throughout its lifecycle, and minimizes the risk of unauthorized access, loss, or breach.

2. Scope

This policy applies to:

- All employees, contractors, interns, and temporary staff
- All digital assets including email, ERP, design files, servers, production systems, and cloud applications
- All external vendors who process or have access to sensitive information
- All locations (Faridabad, Manesar, or remote teams)

3. Policy Objectives

- Prevent unauthorized access to company or customer data
- Ensure secure communication and safe use of IT systems
- Protect data from theft, leakage, accidental loss, or modification
- Maintain business continuity through backup and disaster recovery protocols
- Comply with applicable laws and client confidentiality agreements

4. Information Classification

All information is classified as:

- **Public:** Company brochures, job openings, published CSR activities
- **Internal:** HR policies, meeting minutes, internal reporting data
- **Confidential:** Financial data, pricing, contracts, customer correspondence
- **Highly Confidential:** Technical drawings, 3D models, design data, passwords, access tokens, IP-sensitive files

All users must handle each category of data appropriately and restrict distribution accordingly.



5. Access Control & User Responsibility

- Role-based access controls (RBAC) will be implemented for all ERP, servers, and shared drives
- Employees are responsible for protecting their login credentials and passwords
- Passwords must be **minimum 8 characters**, and changed at least every **365 days**
- Shared accounts or unprotected credential sharing is strictly prohibited
- Laptops must be locked when not in use; files should not be left open or unattended

6. Email, USB, and Internet Use

- Do not open suspicious emails, links, or attachments from unknown senders
- Company email should be used only for business communication
- USB drives must be approved and scanned before use
- Downloading unauthorized software or files from unknown sources is prohibited
- Use only official VPNs or secured connections for remote work

7. Data Backup & Recovery

- Key business data is backed up daily on secure servers/cloud
- Backups are tested **monthly** for restorability
- Design files, customer specs, and production logs are archived securely for **minimum 5 years**

8. Device Security & Endpoint Protection

- Antivirus and firewall software must be installed and updated regularly
- No personal software or tools should be installed on company devices
- All company laptops and desktops must be password-protected and encrypted if possible
- Lost or stolen devices must be reported within **24 hours** to IT and HR

9. Third-Party & Vendor Data Handling

- Any third-party having access to confidential data must sign a **Non-Disclosure Agreement (NDA)**
- Vendors processing sensitive information must comply with this policy and applicable data privacy norms
- Vendor access to IT systems must be temporary, logged, and reviewed

10. Incident Reporting & Management

- Any breach, suspicious activity, or accidental disclosure must be reported **immediately** to: **info@nirotechindia.co.in**
- The incident will be logged, investigated, and resolved within **72 hours**
- Serious breaches will trigger a **root cause analysis** and corrective action
- Incident data will be discussed quarterly during **Management Review Meetings**

11. Employee Training & Awareness

- New employees must undergo **information security orientation** during onboarding
- Annual refresher training is mandatory for all system users
- Posters, reminders, and simulation tests may be conducted to promote awareness

12. Enforcement & Disciplinary Action

- Any employee found violating this policy will be subject to disciplinary measures, including termination or legal action
- Serious breaches (e.g., IP theft, intentional leak) may lead to civil or criminal proceedings

13. Policy Review

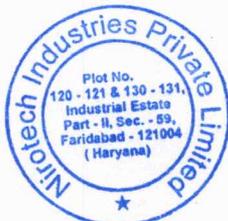
This policy is reviewed **annually** or upon a significant change in IT systems or regulatory requirements. The **Sustainability Officer** and IT Manager are jointly responsible for oversight.



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



ANTI-HARASSMENT POLICY

1. Purpose

Nirotech Industries Pvt. Ltd. ("Nirotech") is committed to providing a safe, respectful, and inclusive work environment for all employees, free from all forms of harassment, discrimination, bullying, and abuse. This policy is aligned with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act)** and other relevant Indian labour laws.

2. Scope

This policy applies to:

- All employees, interns, and trainees (permanent, temporary, contractual, or part-time)
- All locations and departments of Nirotech, including manufacturing sites and offices
- Conduct during work-related travel, off-site meetings, training programs, or events
- Vendors, suppliers, and external stakeholders who interact with our team

3. Zero Tolerance for Harassment

Harassment of any kind will not be tolerated, including but not limited to:

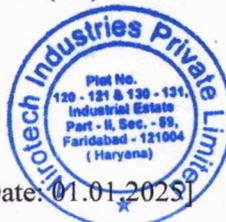
- **Sexual Harassment** (verbal, physical, visual, written, or psychological)
- **Discrimination** based on gender, caste, religion, age, disability, sexual orientation, or any protected characteristic
- **Workplace Bullying**, intimidation, humiliation, or any form of coercive behaviour

4. Examples of Prohibited Behaviour

- Unwanted sexual advances or physical contact
- Inappropriate jokes, emails, or comments of a sexual nature
- Derogatory remarks or slurs about a person's identity
- Displaying offensive materials
- Spreading rumours or using threats to isolate or harm colleagues

5. Internal Committee (IC) Under POSH

Nirotech has constituted an **Internal Committee (IC)** in accordance with the POSH Act. The IC is empowered to:



- Receive and investigate complaints of sexual harassment
- Maintain confidentiality and fairness during proceedings
- Recommend appropriate action, including disciplinary measures

Contact details of IC members are communicated internally and displayed at key locations.

S. NO.	NAME	DESIGNATION	STATUS	CONTACT NO.	EMAIL (IF ANY)
1	Mrs. Nidhi Rai	Director	Chair Person	9818682643	nidhirai@pacindia.net
2	Mr. P L Sharma	Advocate	Member	7011260395	adplshama@gmail.com
3	Mr. Mukesh Sharma	GM HR	Member	8588829048	mukesh.sharma@nirotechindia.co.in
4	Mr. Virender Singh	COO	Member	9958591545	virender.singh@nirotechindia.co.in
5	Mr. Vikram Rawat	Manager	Member	9958591537	vsrawat@pacindia.net
6	Mr. Sunil Kumar	Supervisor	Member	9136096763	
7	Mr. Naushpal	Supervisor	Member	8588829063	
8	Mr. Rakesh Mawai	Supervisor	Member	8588868753	

6. Reporting and Redressal

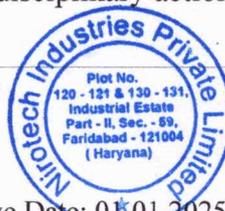
- Any employee who experiences or witnesses harassment should report it to the IC, HR department, or their supervisor.
- Reports can be made **verbally or in writing**, and anonymous complaints will be handled with care wherever possible.
- All complaints are handled sensitively and investigated promptly and fairly.

7. Protection Against Retaliation

Nirotech strictly prohibits retaliation against any individual who:

- Reports harassment or discrimination
- Participates in an investigation

Anyone found retaliating will face disciplinary action.



8. Training and Awareness

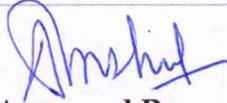
- All employees must undergo **POSH and anti-harassment training** annually
- Awareness posters are displayed at workplace locations
- IC members receive special training on fair investigation processes

9. Enforcement and Disciplinary Action

Any employee found guilty of harassment, discrimination, or retaliation will be subject to appropriate disciplinary action, including **termination of employment** or **legal action**, based on the severity of the offence.

10. Policy Review

This policy is reviewed annually and updated as needed to remain compliant with current laws and best practices.



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



WHISTLE BLOWER POLICY

1. Purpose

The purpose of this Whistleblower Policy is to provide a structured and secure mechanism for employees, contractors, suppliers, and other stakeholders to report concerns about unethical behaviour, actual or suspected fraud, violations of the law, or company policies, without fear of retaliation. Nirotech is committed to a culture of honesty, integrity, and accountability in all its operations.

2. Scope

This policy applies to:

- All employees, officers, and management of Nirotech
- Contract workers, vendors, consultants, and interns
- Any third party interacting with the company or its representatives

3. Reportable Concerns

The policy covers the reporting of concerns including, but not limited to:

- Financial irregularities, fraud, or accounting malpractice
- Bribery, corruption, or unethical business practices
- Violation of company policies, codes, or legal obligations
- Harassment or discrimination
- Conflict of interest
- Data privacy violations or IP misuse
- Environmental and safety negligence
- Retaliation against whistleblowers or witnesses

4. Reporting Channels

Reports can be made confidentially through any of the following methods:

- **Email:** compliance@nirotechindia.co.in or anshul.rai@nirotechindia.co.in
- Directly to the **HR Manager, Compliance Officer, or Department Head**
- Anonymous physical **grievance dropboxes** located at PDC shopfloor entrance near gate number 1. **Opening Frequency:** The physical dropbox shall be opened **once every 30 days (monthly)** to ensure timely review and response to complaints. The dropbox will be jointly managed by the **HR Manager** and the **Compliance Officer**. Both individuals must be present when opening the box to ensure transparency and dual custody.

- **Record Keeping:** Each dropbox opening must be recorded in a **confidential logbook**, including date of access, number of complaints received, and action taken (if applicable).
- **Escalation:** Any serious concerns involving fraud, harassment, or safety shall be immediately escalated to the **Director and Whistleblower Committee** for resolution within 15 working days.

Anonymous reports are accepted; however, providing contact details may assist in investigation.

5. Protection from Retaliation

- Nirotech prohibits retaliation against any individual who reports a concern
- Protection covers any adverse employment action, harassment, demotion, or threat
- Any individual found retaliating against a whistleblower will face **disciplinary action**, including termination

6. Investigation Process

- All concerns will be acknowledged within **3 working days** of receipt
- Investigations will be completed within **15 working days**, or extended if necessary for complex issues
- Findings will be reviewed by the **Whistleblower Committee**
- Corrective action will be taken based on the outcome of the investigation

7. Whistleblower Committee

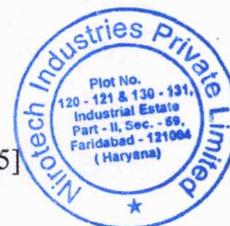
Nirotech has constituted a **Whistleblower Committee** responsible for reviewing and resolving complaints under this policy. The committee includes:

- **All Managing Directors (2)**
- **Director (1)**
- **Chief Operating Officer (1)**
- **HR Representative (1)**

The committee will ensure impartial investigation, confidentiality, and follow-through of corrective actions where required.

8. Confidentiality

- All disclosures and identities (where known) will be kept **strictly confidential**



- Disclosure details will be shared only with those responsible for investigation and resolution
- Whistleblowers are encouraged to retain any evidence that supports their report

9. False Complaints

- While all genuine reports are welcomed, **deliberately false or malicious allegations** are not tolerated
- Misuse of the whistleblower mechanism may result in appropriate disciplinary action

10. Oversight & Review

- The **Sustainability Officer**, in consultation with HR and the Whistleblower Committee, will monitor implementation of this policy
- Summary of whistleblower cases (without names) will be reviewed during **Management Review Meetings (MRMs)**
- The policy will be **reviewed annually** and updated as required by law or business needs

FRAUD

1. Purpose

Nirotech Industries Pvt. Ltd. is committed to conducting its business with honesty, integrity, and transparency. This policy aims to prevent, detect, and respond to fraud and fraudulent activities that may impact the company's operations, financial health, or reputation.

2. Scope

This policy applies to:

- All employees (permanent, temporary, contractual), interns, and apprentices
- Directors, management, and consultants
- Vendors, suppliers, service providers, and external parties acting on behalf of Nirotech

3. Definition of Fraud

Fraud refers to any *intentional* act of deception committed to secure an unfair or unlawful gain. This includes, but is not limited to:



- Misappropriation of assets, inventory, or funds
- Falsification of documents, invoices, or expense claims
- Payroll fraud or ghost employees
- Vendor kickbacks or collusion
- Theft, forgery, or unauthorized alterations of documents
- Manipulation of financial statements
- Conflict of interest leading to personal or financial benefit

4. Zero Tolerance Commitment

Nirotech has **zero tolerance** for any fraudulent conduct. All fraud, whether committed by employees, management, or third parties, will be dealt with seriously and may lead to:

- Disciplinary action, including termination
- Civil recovery proceedings
- Filing of criminal complaints

5. Prevention Measures

- Maintain strong **internal controls** and segregation of duties
- Conduct **pre-employment background checks** through third party agencies or HR reference calls to past companies for verification. Records shall be maintained for the same and reviewed annually
- Implement **multi-level approval workflows** for financial and operational transactions
- Perform **vendor due diligence and validation** before onboarding
- Train employees on recognizing and reporting fraudulent activities

6. Reporting Fraud

Suspected fraud must be reported **immediately** using one of the following channels:

- **Email:** info@nirotechindia.co.in or compliance@nirotechindia.co.in
- **Directly to:** HR Manager or Compliance Officer

All reports will be handled confidentially and investigated promptly.

7. Investigation & Action

- All fraud allegations will be investigated by the **Compliance & Finance Team**
- Investigations will be initiated within **3 working days** of the report

- Final conclusions will be presented to senior management within **15 working days**
- Recovery of losses and corrective action will be initiated where applicable

8. Whistleblower Protection

- Employees or third parties who report fraud in **good faith** are protected from retaliation
- Retaliation against whistleblowers will result in disciplinary action
- False or malicious accusations may lead to disciplinary consequences

9. Monitoring & Compliance

- Regular internal audits will include fraud risk checks
- The **Sustainability Officer** will monitor fraud-related metrics under ESG compliance
- Fraud trends and mitigation steps will be reviewed quarterly in **Management Review Meetings (MRMs)**

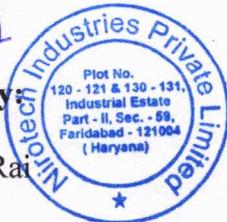
10. Policy Review

This policy is reviewed **annually**, and updated as necessary based on audit findings, business risks, or changes in laws and regulations.



Approved By

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

SOCIAL ACCOUNTABILITY POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we believe that ethical business is not just about products, but about people. This Social Accountability Policy reaffirms our commitment to respecting the rights, dignity, and well-being of all employees, workers, and partners across our value chain. We are committed to upholding global human rights standards, safe working conditions, fair treatment, and transparent labor practices.

2. Scope

This policy applies to:

- All employees, including permanent, temporary, contract, and apprentice workers.
- Suppliers, subcontractors, and service providers working on behalf of Nirotech.
- All operational sites, offices, and production facilities.
- Any external partners or stakeholders interacting with our workforce.
- Customers and business partners interacting with our products or services
- The local community in which Nirotech operates, through responsible social impact practices
- The environment, by ensuring ethical conduct is integrated with environmental sustainability in operations

3. Guiding Principles

Nirotech's social accountability commitments are grounded in:

- The **SA8000 Standard for Social Accountability**
- The **Universal Declaration of Human Rights**
- The **International Labour Organization (ILO) Core Conventions**
- The **United Nations Global Compact**
- Applicable **Indian labour and social protection laws**

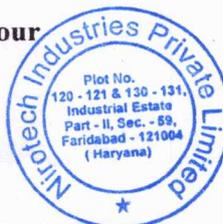
4. Key Commitments

❖ No Child Labour

- No workers under 18 years are employed
- Age documentation is mandatory at hiring
- In compliance with the Child Labour (Prohibition and Regulation) Act

❖ No Forced or Involuntary Labour

- Employment is freely chosen



- Workers are not coerced, threatened, or held through bonded arrangements
- Identity / Original documents are never withheld
- ❖ **Health & Safety**
 - A safe and hygienic working environment is maintained
 - Regular safety training is mandatory for all staff
 - Emergency response systems, PPE, and health check-ups are provided
- ❖ **Freedom of Association**
 - Employees may join trade unions or worker committees without fear of retaliation
 - Collective bargaining is respected as per Indian law
- ❖ **Non-Discrimination**
 - Equal treatment regardless of gender, caste, religion, disability, or sexual orientation
 - Employment decisions are based solely on merit and business needs
- ❖ **Fair Working Hours & Minimum Wages**
 - Working hours comply with applicable laws
 - Overtime is voluntary and compensated
 - Minimum wages are paid, and pay slips are issued to all workers
- ❖ **Disciplinary Practices**
 - No corporal punishment, mental or physical coercion, or verbal abuse is tolerated
 - Disciplinary procedures are fair, documented, and communicated in advance

5. Supplier & Partner Expectations

- All vendors, contractors, and subcontractors must follow Nirotech's **Code of Conduct** and this Social Accountability Policy
- Suppliers must sign declarations confirming compliance with labour, EHS, and human rights norms
- **Periodic audits or assessments may be conducted** for validation
- Suppliers may be required to complete **periodic self-assessments** on social compliance

6. Grievance Mechanism

Workers can raise concerns without fear through:

- Direct access to HR or supervisors



-
- Anonymous suggestion or grievance boxes
 - **Email:** info@nirotechindia.co.in

All grievances are reviewed **confidentially within 3 working days** and resolved **within 15 working days**. Retaliation is not tolerated.

7. Training & Awareness

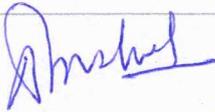
- All new employees are trained on workplace rights and ethical conduct
 - Annual refreshers are conducted on **POSH**, health & safety, and grievance redress
 - Training content is adapted to literacy levels and languages spoken in the workforce
-

8. Monitoring & Compliance

- Social accountability indicators are tracked as part of ESG and compliance KPIs
 - Internal audits are conducted annually and reviewed in **Management Review Meetings (MRMs)**
 - The **Sustainability Officer**, along with HR, is responsible for policy oversight
-

9. Continuous Improvement

- Corrective and preventive action plans (CAPA) are implemented for any non-conformances
 - Feedback from employees, customers, and suppliers is used to improve practices
 - Progress is disclosed through internal reporting and ESG summaries
-



Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

MONEY LAUNDERING POLICY

1. Purpose

The purpose of this Anti-Money Laundering (AML) Policy is to ensure that Nirotech Industries Pvt. Ltd. operates in full compliance with all applicable anti-money laundering and anti-terrorist financing laws and regulations in India and internationally. The company maintains **zero tolerance** for the use of its operations, banking channels, or supply chain for laundering illicit funds or financing criminal activities.

2. Scope

This policy applies to:

- All directors, officers, employees, and authorized representatives
- All financial transactions involving customers, suppliers, agents, and third parties
- All domestic and international payments or financial arrangements conducted on behalf of the company

3. Definition of Money Laundering

Money laundering involves disguising the origins of illegally obtained money by transferring it through legitimate businesses or foreign banks. The process typically includes three stages:

- **Placement:** Introducing illicit funds into the financial system
- **Layering:** Concealing the origin through complex transfers or transactions
- **Integration:** Reintroducing laundered money into the economy as seemingly legitimate assets

4. Nirotech's AML Commitments

- **Zero Tolerance:** Nirotech will not support or facilitate any form of money laundering or terrorist financing
- **Due Diligence:** We will conduct Know Your Customer (KYC), Know Your Supplier (KYS), and Know Your Agent (KYA) checks before engaging in high-value or foreign transactions
- **Screening:** Background checks and risk assessments are mandatory for customers, vendors, or agents operating in high-risk regions or sectors
- **Transaction Monitoring:** Financial transactions will be reviewed for unusual activity, including:
 - Payments made through unrelated third parties
 - Over-invoicing or under-invoicing



- Cash or untraceable payments
- Requests for payments in offshore accounts or tax havens

5. Due Diligence Process

- Vendors and customers must share PAN, GST, bank account verification, and company registration documents
- Foreign payments will require additional documentation (e.g., purchase orders, invoices, BOE copies, FEMA compliance)
- All contracts must include a clause stating that neither party will engage in unlawful financial conduct, including money laundering

6. Red Flags That May Indicate Money Laundering

Employees must be alert to signs such as:

- Requests for payments to multiple or unusual accounts
- Unjustified large advance payments
- Use of shell companies with no clear business operations
- Reluctance to provide standard business documentation
- Complex ownership structures that obscure the actual beneficiary

7. Reporting Suspicious Activity

Any suspicion of attempted or actual money laundering must be reported immediately and confidentially to:

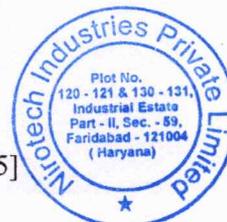
✉ info@nirotechindia.co.in or compliance@nirotechindia.co.in

The Compliance Officer (or designated Finance/Accounts Manager) will:

- Log the incident
- Conduct an internal investigation within **7 working days**
- Escalate to senior management or legal counsel where appropriate
- Report to relevant regulatory authorities if required under law

8. Employee Responsibilities

- Know your customers and suppliers — ask questions and verify documentation



- Never accept payments or deposits in personal accounts or in cash unless approved by Finance
- Never split invoices or break transactions to evade banking or compliance protocols
- Attend mandatory AML awareness and financial integrity training annually

9. Non-Compliance and Disciplinary Action

- Breach of this policy can result in **disciplinary action**, including termination and legal proceedings
- Non-compliance with AML laws may lead to **criminal liability**, penalties, and damage to Nirotech's reputation

10. Oversight and Review

This policy is owned by the **Finance Department** in collaboration with the **Sustainability Officer**.

It will be:

- Reviewed **annually**
- Updated based on changes in law, risk environment, or internal control audits
- Audited as part of annual ESG and compliance reviews

Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



CODE OF CONDUCT AND ETHICS

INTRODUCTION

Nirotech Industries Code of Conduct is one of the ways the company expects every member of its team to respect ethical business behaviour. The purpose of this Code of Conduct and Ethics (“Code” or “Code of Conduct”) is to promote conduct of business ethically in an efficient and transparent manner and to meet its obligations to shareholders and all other stakeholders.

APPLICATION OF THIS CODE

This Code of Conduct applies to all the directors and all the Employees of the Company.

REGULATORY COMPLIANCE

The Company is committed to high standards of corporate governance and believes in compliance with all the laws and regulations. The Company is committed to provide in time, accurate and complete information as required, to all concerned including its stakeholders.

RESPECT, HARASSMENT AND DISCRIMINATION

In this direction, the Company shall:

- treat individuals in all aspects of employment solely on the basis of ability irrespective of race, caste, creed, religion, age, disability, gender, sexual orientation or marital status; and
- not tolerate racial, sexual or any other kind of harassment

The Company is committed to respect human rights everywhere it does business.



HONEST AND ETHICAL CONDUCT

The Directors and Employees of the Company should act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct.

Honest conduct is conduct that is free from any fraud or deception.

Ethical conduct is conduct conforming to accepted professional standards of conduct and shall include ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

Employees shall refrain from using their personal connections, relationships etc. to exert external intervention and/or force to influence the Company's decisions on any matter relating to day-to-day working, furtherance of their personal interests, including but not limited to promotion, transfer, job rotation etc.

CONFLICTS OF INTEREST

The Directors and Employees shall not engage in any activity or enter into any commercial relationship which might result in conflict of interest, either directly or indirectly.

A "conflict of interest" occurs when an individual's personal interest directly or indirectly interferes or appears to interfere with the interest of the Company.

MISUSE OF OPPORTUNITIES AND INFORMATION

The Directors and Employees owe a duty to the Company to advance the Company's business interest when appropriate. The Directors and Employees are prohibited from taking (or directing to a third party) a business opportunity (relevant to the line of business intended to be pursued by the Company) that is discovered through the use of Company property, information or position, unless the Company has already been offered the opportunity and turned it down.

The Directors and Employees are prohibited from using Company property, information or position for personal gain and from competing with the Company.



CONFIDENTIAL INFORMATION

During the course of employment or dealing with the Company, any information of a confidential nature (whether about the Company, other companies or individuals) that is known to Directors or Employees shall be treated as confidential unless publicly available. Such information should be used only for the purpose of the business of the Company. The use of Company information for personal gain is strictly prohibited.

FAIR DEALING

Each Director and Employee should endeavour to deal fairly with the Company's customers, service providers, suppliers, competitors and other Employees. No Director or Employee should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

PROTECTION AND PROPER USE OF COMPANY ASSETS

The assets of the Company shall not be misused by the Directors and Employees during the course of conducting the business of the Company or otherwise. The assets include tangible assets such as equipment and machinery, systems, facilities, materials, resources, etc. as well as intangible assets such as patents, proprietary information, process, design, etc.

ANTI-BRIBERY AND ANTI-CORRUPTION

The Directors and Employees shall comply with the applicable anti-corruption and anti-bribery laws and they shall not indulge in any act or practice which results into breach of such laws.

The payment of bribes, kickbacks, facilitation payments and/or other payments of this nature in cash or kind to obtain business or otherwise gain advantage for the Company is strictly prohibited, irrespective of whether payments or offers are made directly or indirectly.



GIFTS AND ENTERTAINMENT

Directors and Employees shall neither receive nor offer or make directly/indirectly any illegal payments, gifts or any benefits which are intended to obtain unethical favor.

SAFETY, HEALTH AND ENVIRONMENT

The Company visualizes no compromise in its commitment to safety, health and responsible care for the environment. Health and safety of the people in and around its area of operations are of top importance to the Company.

The Company strictly adheres to the EHS policy to meet highest standards in terms of Safety, Health & Environment protection.

COMMITMENT TO HUMAN RIGHTS & INTERNATIONAL STANDARDS

Nirotech is committed to upholding international standards of human rights, labour rights, environmental protection, and anti-corruption, including principles outlined by the United Nations Global Compact and the International Labour Organization (ILO).

WHISTLEBLOWER POLICY

Nirotech encourages all employees to report any unethical behaviour, violations of this Code, or legal breaches. Reports can be made anonymously and will be handled with confidentiality and without retaliation.

Employees can report concerns directly to the Compliance Officer or via email:
info@nirotechindia.co.in

DIVERSITY, EQUITY & NON-DISCRIMINATION

Nirotech promotes a diverse and inclusive workplace. Discrimination of any kind—based on gender, religion, caste, disability, age, sexual orientation, marital status, or any other protected

characteristic—is strictly prohibited. We are committed to providing equal opportunities in all aspects of employment.

SUPPLIER CODE OF ETHICS

Nirotech expects all its suppliers and vendors to follow ethical practices aligned with this Code of Conduct. This includes:

- Compliance with all applicable laws and regulations
- Zero tolerance for corruption, bribery, or child labour
- Safe and healthy working conditions
- Respect for fundamental human rights

IMPLEMENTATION

The Directors and Employees are accountable for full compliance with this Code of Conduct. Sanctions for breach of this Code shall be determined by the Board in the case of Directors and the Managing Director in the case of Employees. Sanctions may include serious disciplinary action, removal from office as well as other remedies, all to the extent permitted by law and as appropriate under the circumstances.

All employees must **annually acknowledge** this Code of Conduct in writing.

Regular trainings will be conducted to ensure understanding and implementation.

Non-compliance may result in **warnings, suspension, termination, or legal consequences**, depending on the severity of the violation.



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



WORK ETHICS

1. Purpose

The purpose of this policy is to promote and enforce a high standard of ethical conduct, professionalism, and personal responsibility across all roles and levels at Nirotech Industries Pvt. Ltd. This aligns with our company values, ESG goals, and commitment to excellence, integrity, and respect.

2. Scope

This policy applies to:

- All full-time, part-time, temporary, contract, and apprentice workers
- Supervisors, managers, directors, and leadership
- All sites, plants, and office locations of Nirotech

3. Core Work Ethics Values at Nirotech

❖ Integrity and Honesty

- Employees must act truthfully and transparently in all business dealings
- Fraud, theft, misrepresentation, or misuse of company resources is strictly prohibited
- Any known or suspected unethical behaviour must be reported immediately

❖ Punctuality and Discipline

- Employees are expected to report to work on time and follow shift schedules as assigned
- Absenteeism, late arrivals, or early departures without proper approval will be subject to disciplinary measures
- Overtime is voluntary but must be recorded transparently

❖ Accountability

- Every employee is responsible for their work, deadlines, and decisions
- Mistakes must be acknowledged and reported for timely correction
- Excuses or blame-shifting is not tolerated

❖ Respect and Workplace Behavior

- All employees must treat each other with dignity and respect, regardless of rank, gender, caste, or background
- Harassment, bullying, discrimination, or offensive language is not tolerated
- Smoking, intoxication, and disruptive behaviour at the workplace are strictly prohibited

❖ Quality and Productivity

- Employees must commit to high standards in work quality and continuous improvement
- Wastage of time, resources, or raw material is to be minimized
- Continuous skill-building and participation in training is expected

❖ Safety and Compliance

- All employees must follow **Personal Protective Equipment (PPE)** rules and **safety protocols** without exception
- Safety violations or negligence may lead to disciplinary action
- Emergency procedures (medical, fire, evacuation) must be followed diligently

❖ Teamwork and Cooperation

- Collaboration is encouraged across departments and functions
- Sharing of knowledge, support for colleagues, and problem-solving as a team is a key value
- Disputes must be resolved respectfully or escalated through HR or Works Committee if unresolved

4. Grievance Redressal

Employees may raise concerns regarding unethical behaviour or work conditions through the **Grievance Policy**. Channels include:

- Immediate supervisor
- Works Committee representatives
- Email to: info@nirotechindia.co.in
- Drop boxes for anonymous complaints

Grievances are addressed in accordance with a defined 3-stage procedure and within designated timelines, as per the internal grievance policy.

5. Dress Code and Hygiene

- Uniforms (where applicable) must be worn neatly and correctly
- Hygiene in the workplace (especially on the shop floor) is mandatory
- Cleanliness of personal space and common areas is everyone's responsibility



6. Confidentiality and Data Ethics

- Employees must protect company data, designs, and customer information
- Data must not be copied, shared, or stored on unauthorized devices
- Confidentiality agreements must be respected even after employment ends

7. Compliance and Disciplinary Action

Failure to follow work ethics may lead to warnings, suspension, or termination. Disciplinary action may be initiated for:

- Habitual absenteeism or poor punctuality
- Misuse of company property
- Repeated non-compliance with safety measures
- Harassment, theft, or falsification of records

8. Awareness and Review

- This policy will be circulated to all employees during induction
- Posters and reminders will be displayed at factory and office locations
- The **HR Department** and **Sustainability Officer** will review the policy annually
- Refresher training sessions will be conducted annually to reinforce ethical standards

WORKING CONDITION POLICY

Purpose:

M/s Nirotech Industries Pvt Ltd is committed to providing a work environment that is safe, healthy, and respectful for all employees.

Scope:

This policy applies to all Nirotech Industries Pvt Ltd employees, contractors, and visitors.

Policy:

1. Health and Safety

- 1.1. We will provide a work environment that minimizes risks to health and safety.
- 1.2. Employees must report all incidents, injuries, and near-misses to their supervisor or HR representative.
- 1.3. We will investigate all reported incidents and take corrective action as necessary.

2. Workplace Facilities

- 2.1. We will provide a clean, safe, and healthy workspace.
- 2.2. Employees will have access to adequate lighting, ventilation, and sanitation facilities.
- 2.3. We will maintain a comfortable temperature range in the workspace.

3. Working Hours and Breaks

- 3.1. Employees will work a standard 48 hour workweek.
- 3.2. Employees will be entitled to regular breaks and meal periods.
- 3.3. Overtime will be approved in advance by management.

4. Respectful Workplace

- 4.1. We will maintain a workplace free from harassment, bullying, and discrimination.
- 4.2. Employees will treat colleagues, customers, and visitors with respect and dignity.
- 4.3. We will not tolerate any form of harassment, bullying, or discrimination.

5. Employee Well-being

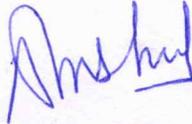
- 5.1. We will promote employee well-being through access to employee assistance programs and wellness initiatives.
- 5.2. Employees will have access to confidential counselling services.
- 5.3. We will support employees in achieving a balance between work and personal life.

Responsibilities:

1. Employees: Employees are responsible for following workplace policies and procedures, reporting incidents, and contributing to a respectful workplace.
2. Supervisors: Supervisors are responsible for ensuring employees under their supervision are aware of and follow workplace policies and procedures.
3. HR: HR Department are responsible for developing, implementing, and enforcing workplace policies and procedures.

Compliance:

This policy will be reviewed and updated annually or as necessary. Employees must comply with this policy, and failure to do so may result in disciplinary action.


Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



MINIMUM WAGE POLICY

Minimum Wages Policy ensures that employees are paid a fair and equitable wage for their work.

Purpose:

M/s Nirotech Industries Pvt LTD is committed to paying its employees a minimum wage that meets or exceeds the applicable legal requirements.

Scope:

This policy applies to all Nirotech Industries Pvt LTD employees.

Policy:

1. Minimum Wage Rates: We will pay employees at least the minimum wage rate as prescribed by the applicable laws and regulations.
2. Regular Review: We will regularly review and adjust our minimum wage rates to ensure compliance with applicable laws and regulations.
3. Fair and Equitable: We will ensure that our minimum wage rates are fair and equitable, taking into account factors such as location, industry standards, and job requirements.

COMPENSATION POLICY

Policy ensures that employees receive fair and equitable compensation for their work.

Purpose:

M/s Nirotech Industries Pvt Ltd. is committed to providing adequate compensation to its employees, ensuring that they are fairly rewarded for their contributions.

Scope:

This policy applies to all Nirotech Industries Pvt Ltd employees.

Policy:

1. Fair and Equitable Compensation: We will provide compensation that is fair, equitable, and reflective of industry standards.
2. Job Evaluation: We will conduct regular job evaluations to ensure that compensation is aligned with job responsibilities and requirements.
3. Market Competitiveness: We will regularly review market trends and competitor data to ensure our compensation packages remain competitive.

Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



FREEDOM OF ASSOCIATION

1. Purpose

Nirotech Industries Pvt. Ltd. respects the rights of all employees to freely associate, join organizations of their choice, and participate in collective bargaining, in line with national laws and international standards such as the **ILO Conventions 87 and 98**. This policy reinforces our commitment to ethical labor practices and social dialogue.

2. Scope

This policy applies to:

- All employees of Nirotech, regardless of employment type, location, or job role
- All contract workers, apprentices, and temporary staff on Nirotech premises
- Suppliers and vendors are also expected to uphold similar values in their workplaces

3. Policy Commitments

❖ Freedom of Association

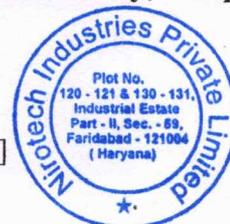
- All employees have the right to **form or join trade unions, employee committees, or worker groups** of their choosing
- Nirotech will not **interfere with, restrict, or retaliate** against employees for exercising these rights
- Participation in legally recognized employee associations will have **no adverse effect** on employment or growth

❖ Collective Bargaining

- Employees have the right to be represented by trade unions or worker representatives during collective bargaining
- Nirotech is committed to engaging in **good faith dialogue** with duly elected employee representatives
- We will comply with all applicable labor laws and industrial relations regulations

❖ Open Communication Culture

- In addition to formal structures, Nirotech encourages **open-door communication** where workers can express ideas, concerns, or grievances without fear
- Employees may raise issues directly to supervisors, HR, or via internal grievance channels
- All matters raised will be addressed **respectfully, confidentially, and promptly**



4. Non-Retaliation & Equal Treatment

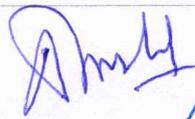
- No employee shall be discriminated against based on union membership or participation in collective activities
- All workers will continue to receive **equal treatment in wages, promotions, and access to training**, regardless of association status
- Retaliation or threats against organizing activities are strictly prohibited and subject to disciplinary action

5. Supplier Expectations

- Nirotech expects its suppliers and contractors to respect similar rights within their own operations
- Supplier audits may include verification of compliance with fair labor standards and worker representation

6. Oversight and Review

- The **Sustainability Officer** and HR will monitor compliance and engagement related to this policy
- Reports or complaints related to violation of association rights can be emailed to: **info@nirotechindia.co.in**
- This policy will be reviewed **annually** and revised as needed based on legal changes or workforce needs



Approved By

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

ESG PURPOSE

“Driving sustainable growth with innovation, responsibility, and care for people and the planet.”

Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



ETHICS ESCALATION POLICY

1. Purpose

Nirotech Industries Pvt. Ltd. is committed to maintaining the highest standards of integrity, transparency, and ethical conduct. This policy provides a clear mechanism for employees and stakeholders to report concerns related to unethical, illegal, or improper behaviour without fear of retaliation.

2. Scope

This policy applies to:

- All employees (permanent, temporary, contractual), interns, and apprentices
- Directors, managers, and consultants
- Suppliers, vendors, service providers, and external partners who interact with Nirotech

3. What to Report

Any individual can raise a concern if they reasonably believe there has been:

- Fraud, bribery, or corruption
- Breach of the Code of Conduct, HR policies, or company values
- Discrimination, harassment, or abuse of authority
- Misuse of company property or confidential information
- Conflict of interest or ethical violations
- Non-compliance with laws, regulations, or contractual obligations

4. Reporting Channels

Reports can be made through the following secure and confidential channels:

- **Email:** info@nirotechindia.co.in
- **Direct Reporting:** To HR Manager or the Compliance Officer

5. Investigation Process

- All reports will be acknowledged within **3 working days**
- Investigations will be conducted within **15 working days** from acknowledgment
- All findings will be reviewed by the Compliance Officer and, if required, escalated to senior management



- The identity of the whistleblower will be protected to the fullest extent possible

6. Whistleblower Protection

- No employee will be subject to retaliation, harassment, or victimization for reporting concerns in **good faith**
- Any act of retaliation will result in disciplinary action, including termination
- The company encourages open, honest reporting without fear

7. Confidentiality & False Allegations

- All reports will be kept strictly confidential
- Deliberately false or malicious complaints will be treated as a serious disciplinary offense

8. Monitoring & Oversight

- Reports and actions taken will be reviewed quarterly by the **Ethics & Compliance Team**
- The **Sustainability Officer** will include ethics metrics in ESG performance reporting
- A summary of escalated issues and resolutions will be shared (anonymously) during **Management Review Meetings**

9. Policy Review

This policy is reviewed **annually** or as required by changes in law or internal requirements. Updates are approved by the Board and communicated to all employees



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



CUSTOMER HEALTH & SAFETY POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., ensuring the health and safety of our customers and end users is a top priority. This policy affirms our commitment to delivering defect-free, high-precision components that are safe, compliant, and meet all customer and legal requirements.

2. Scope

This policy applies to:

- All Nirotech products, components, and processes
- All functions involved in design, manufacturing, testing, and supply
- All customers including Tier 1's, OEMs, and export clients across sectors

3. Policy Commitments

❖ Product Safety & Quality

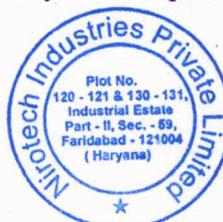
- Meet all relevant technical and safety specifications agreed with the customer
- Ensure **zero field failures** by deploying preventive quality tools like **APQP, FMEA, MSA, and SPC**
- Maintain **quality performance within <100 PPM rejection levels** (internal target)
- Ensure product designs and performance align with **REACH, RoHS, and ELV** (as applicable)

❖ Process Controls & Traceability

- Conduct **100% leak testing, material verification, and visual inspections** for safety-critical components
- Maintain **full process traceability** from raw material to dispatch
- Archive test reports and batch traceability data for a minimum of **5 years**

❖ Product Recall Preparedness

- Maintain a documented **Product Recall Procedure**
- In case of a product defect with safety implications, initiate the recall within **7 days** of identification
- Notify affected customers immediately and cooperate fully to contain risk



❖ Customer Complaint Handling Timeline

- All customer complaints are **logged and acknowledged within 24 hours**
- **Root cause analysis and interim containment within 5 working days**
- **Permanent Corrective Action Report (PCAR) submission within 10 working days**
- **Closure and effectiveness verification within 15 working days**

❖ Compliance Certificates & Legal Responsibility

- Maintain **Material Test Certificates (MTCs)** and **REACH/RoHS/ELV declarations** from raw material suppliers
- Store all compliance documentation **digitally for at least 5 years**
- Nirotech carries **Product Liability Insurance of ₹30 crore** to cover safety assurance and risk coverage

4. Supplier Responsibility

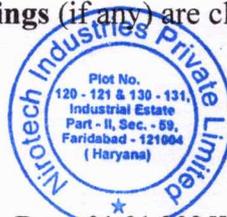
- All suppliers must comply with Nirotech's material and quality standards
- Compliance declarations for critical chemical and metallurgical properties are mandatory for each batch
- Suppliers failing to meet safety norms are removed from the **Approved Vendor List**

5. Employee Training & Awareness

- Production and Quality teams receive training on **critical-to-safety characteristics (CTQ/CC)**
- Annual refreshers are held on **customer complaint handling and product risk management**
- Employees are empowered to **halt production or dispatch** in case of suspected quality deviation

6. Monitoring & Continuous Improvement

- Product safety is tracked through:
 - **Customer complaints & returns**
 - **In-process rejection rates**
 - **Field failure records**
- Policy effectiveness is reviewed quarterly in the **Management Review Meeting (MRM)**
- Safety-related **customer audit findings** (if any) are closed within agreed timelines



7. Communication & Transparency

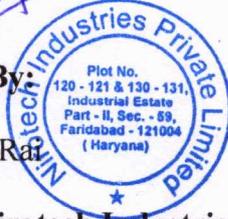
- This policy is shared with all stakeholders and **available upon request**
- It is included in **customer audits, ESG documentation, and quality manuals**
- Regular communication of updates is ensured via internal and customer platforms



Approved By

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Purpose

At Nirotech Industries Pvt. Ltd., we believe in creating long-term value not only for our customers and stakeholders but also for the communities we operate in. Our CSR policy reflects our commitment to operate in a socially responsible, environmentally sustainable, and economically inclusive manner, contributing positively to society.

This policy is framed in accordance with the provisions of **Section 135 of the Companies Act, 2013** and the rules made thereunder.

2. CSR Vision and Objectives

Vision:

To be a socially responsible organization contributing to the welfare of people and the planet through meaningful, sustainable, and impactful initiatives.

Objectives:

- To actively engage in projects that benefit the underprivileged, marginalized, and rural communities
- To promote inclusive growth and environmental sustainability
- To strengthen partnerships with NGOs, local bodies, and other stakeholders for collective impact
- To integrate CSR as a key pillar of our ESG journey

3. Key Focus Areas

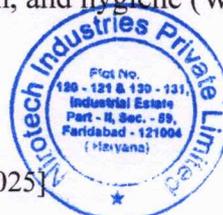
Our CSR activities will be centered on the following themes, aligned with **Schedule VII of the Companies Act, 2013**, and our broader ESG goals:

I. Education & Digital Literacy

- Supporting underprivileged schools with infrastructure and learning aids
- Scholarships for meritorious and economically disadvantaged students
- Promoting digital literacy and e-learning in rural and semi-urban areas

II. Healthcare & Sanitation

- Organizing free health check-up camps, blood donation drives, and awareness programs
- Supporting maternal and child healthcare programs
- Promoting access to safe drinking water, sanitation, and hygiene (WASH)



III. Skill Development & Livelihood Enhancement

- Providing vocational training in areas such as machining, die casting, and welding
- Empowering women and youth through job-readiness programs
- Creating entrepreneurship and self-employment opportunities through skilling

IV. Environmental Sustainability

- Tree plantation drives and creation of green zones
- Energy conservation awareness and promotion of clean technologies
- Waste segregation, water harvesting, and recycling initiatives

V. Rural & Community Development

- Building or supporting infrastructure in nearby villages (roads, toilets, solar lights)
- Supporting community halls, libraries, and playgrounds
- Promoting digital infrastructure in rural areas

VI. Support for Differently-Abled and Marginalized Groups

- Funding assistive devices, therapies, and inclusive programs
- Supporting education and rehabilitation of differently-abled individuals
- Providing equal opportunity employment pathways

Other initiatives under Schedule VII may also be supported as per community needs and Board approval.

4. CSR Budget

Nirotech will allocate a minimum of **2% of average net profits of the last 3 financial years** as CSR spend, as per statutory guidelines. Any unspent amount, if applicable, shall be dealt with as per **Section 135(5) and (6)** of the Companies Act, 2013.

5. Governance Structure

A **CSR Committee of the Board** will oversee the policy's implementation.

The committee shall:

- Recommend projects and budgets to the Board
- Monitor implementation and impact
- Ensure proper disclosures in the Board's Report and CSR portal



6. Implementation Approach

- CSR programs will be implemented directly by Nirotech, or through registered NGOs, trusts, or Section 8 companies.
- Preference will be given to local areas around our plants (Faridabad & Manesar).
- Periodic audits, impact assessments, and stakeholder feedback will be part of the implementation model.

7. Monitoring and Reporting

- CSR activities will be tracked using measurable indicators and documented as per statutory and ESG reporting norms.
- An annual CSR report will be included in the Board's Report.
- The CSR policy and projects will be published on Nirotech's official website.

8. Policy Review

This policy will be reviewed annually by the CSR Committee and updated based on legal changes, CSR performance, and stakeholder feedback.

Approved By:

Mr. Anshul Rai



Director, Nirotech Industries Pvt. Ltd.

SUSTAINABLE PROCURMENT POLICY

The Sustainable Procurement Policy sets out the principles for sustainable business conduct. Compliance with the Policy is an integral part of the business strategy of the Company.

1. Scope

This policy is applicable to all suppliers, contractors, service providers, vendors, distributors, and business partners of NIPL.

2. Policy statement and guideline

We at Nirotech Industries Private Limited are always driven by “True” values—our unwavering commitment to always do the right thing for our environment, our clients, our people, our suppliers and our communities. We are committed to social impact and strive for sustainability across every function, including sourcing and procurement by achieve the following

- **Statutory and Regulatory compliance**

The supply chain of NIPL may pose significant compliance risks. The compliance aspects that may be considered include corruption, fraud, export controls and sanctions, environmental, social and governance (ESG) standards, Financial and tax legislations, Company’s Act, labor laws, health and safety laws, Responsible Minerals Initiative (RMI) guidelines, Restriction of Hazardous Substances (RoHS) guidelines, Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) guidelines amongst others.

It is important to encourage the contractors, suppliers, transporters, service providers and other business partners to ensure total compliance to applicable legal and other requirements that may have an impact on their sustainable development. The “other” requirements include national and international treaties, agreements, protocols, trade association guidelines, etc.

- **Promote local procurement**

Localizing supply chain presents an opportunity for social- economic development of a region. Local shipping and storage results into reduction in emissions and energy usage during the transportation and storage of materials. Sourcing locally also helps in building consumer confidence due to an assured supply of raw materials.

Sourcing locally not only helps in improving the bottom-line, it also helps in increasing the economic activity in the region, increase in employment opportunities in local economy and has a positive impact on the livelihood of people in the community.

NIPL is committed to give priority to the purchase of locally available materials / products of high quality to minimize the overall environment footprint of the Company within the constraints of quality requirements from the customer.

- **Compliance towards Supplier Code of Ethics**

The Code is prepared to convey the commitment of NIPL to engage suppliers whose production processes are responsible and environmentally friendly. The principles expressed in the Code will form the basis of supplier selection and evaluation. The Company expects its suppliers to replicate these standards further down the value chain. It is therefore made available to the suppliers to strengthen the mutual understanding of how these principles must be practiced in day-to-day business, including the advancement of efforts to contribute to better health of people, animals and plants.

- **Supplier monitoring and evaluation**

Sustainable supplier selection is a vital factor in sustainable supply chain management. Sustainable development performance of suppliers must be evaluated based on the monitoring and assessment mechanism. As a part of this, all the new potential suppliers must undergo pre-qualification criteria to comply with the Code.

- **Supplier engagement and communication**

Building high levels of supplier engagement improves efficiency, accuracy and cost effectiveness of all interactions. It is important to consistently align suppliers with the technology and category strategies of the Company.

Objectives of supplier engagements are to improve transparency and availability of procurement-related information to the suppliers. NIPL will work with suppliers, vendors and business partners for continual improvement of processes.

- **Circular Economy**

The importance of preserving nature and reducing costs through sustainable waste management practices. To achieve this, we will

- Incorporate circular economy principles into our procurement processes.
- Give preference to suppliers that offer products and packaging with a focus on recyclability and reduced environmental impact.

- **Eco-Friendly Transport**

NIPL acknowledge the environmental impact of transportation and are committed to reducing our carbon footprint. To achieve this, we will:

- Adopt initiatives such as milk run systems to optimize transport routes and reduce fuel consumption.
- Prioritize vehicles that utilize fuels with lower Global Warming Potential (GWP), such as CNG (Compressed Natural Gas), EV (Electric Vehicles), and other environmentally friendly alternatives.
- Optimize transport vehicle/container utilization by maximizing volume space and minimizing empty trips.

3. Sustainable and Inclusive Sourcing

Nirotech Industries Pvt. Ltd. expects its suppliers to actively support responsible and inclusive procurement practices as part of their engagement with us.

Suppliers are encouraged to:

- **Source raw materials and inputs sustainably**, minimizing environmental impact and promoting circular economy practices.
- **Prioritize local and diverse suppliers** (including MSMEs, women-owned, or minority-owned businesses) wherever possible.
- **Comply with environmental and labour regulations** across their own supply chains.
- **Disclose sourcing origins** of key raw materials when requested (especially high-risk categories).
- Collaborate with Nirotech to improve **traceability, emissions tracking**, and ethical practices.

By adhering to this Sustainable Procurement Policy, NIPL and its suppliers can contribute to a more sustainable and responsible supply chain. We are committed to working together to achieve our sustainability goals and create a positive impact on the environment and society.



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



SUPPLIER CODE OF ETHICS

1. Purpose

This Supplier Code of Ethics outlines the principles and expectations Nirotech Industries Pvt. Ltd. requires of all its suppliers, vendors, contractors, and business partners. Suppliers must uphold the same high standards of ethical conduct, integrity, and legal compliance that Nirotech applies to its own operations.

This Code reflects our commitment to responsible sourcing, sustainable development, and respect for human rights in line with international norms such as the **UN Global Compact**, **ILO Conventions**, and **Indian Law**.

2. Scope

This Code applies to:

- All direct and indirect suppliers of goods and services
- Contract manufacturers, logistics providers, consultants, and subcontractors
- All individuals and organizations engaged in business with Nirotech

3. Compliance Requirements

Suppliers must comply with:

- All applicable local, national, and international laws and regulations
- All terms and conditions agreed in their contract with Nirotech
- The principles set forth in this Code of Ethics

4. Ethical Business Conduct

Suppliers are expected to:

- Avoid **bribery, corruption, and fraud** in any form
- Not offer gifts, payments, or Favors to influence Nirotech decisions
- Maintain accurate records and transparent accounting
- Immediately report any suspected misconduct involving Nirotech or its representatives



5. Human Rights & Labour Practices

Suppliers must uphold:

- **No child labour** – no worker under 18
- **No forced labour** – employment must be voluntary
- **Freedom of association** – respect employees' rights to join unions or committees
- **Non-discrimination** – no bias based on gender, caste, religion, or disability
- **Fair wages and working hours** in line with applicable labour laws
- **Safe and healthy working conditions** for all employees

6. Environmental Responsibility

Suppliers are expected to:

- Comply with all environmental laws and regulations
- Minimize waste, emissions, and pollution
- Safely manage hazardous materials and industrial waste
- Work towards improving energy efficiency and sustainability in their operations

7. Sustainable and Inclusive Sourcing

Nirotech Industries Pvt. Ltd. expects its suppliers to actively support responsible and inclusive procurement practices as part of their engagement with us.

Suppliers are encouraged to:

- **Source raw materials and inputs sustainably**, minimizing environmental impact and promoting circular economy practices.
- **Prioritize local and diverse suppliers** (including MSMEs, women-owned, or minority-owned businesses) wherever possible.
- **Comply with environmental and labour regulations** across their own supply chains.
- **Disclose sourcing origins** of key raw materials when requested (especially high-risk categories).
- Collaborate with Nirotech to improve **traceability, emissions tracking**, and ethical practices.

8. Information Security & Confidentiality

Suppliers must:

- Protect all confidential information shared by Nirotech

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- Not share or misuse technical data, drawings, pricing, or IP
 - Comply with **data privacy and cyber security standards**, especially if handling sensitive or customer-related information
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9. Conflict of Interest

- Suppliers must avoid any situation where personal interests conflict with Nirotech's interests
 - Any potential or actual conflict must be disclosed promptly to Nirotech
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10. Monitoring & Enforcement

- Nirotech reserves the right to **audit supplier facilities**, review documents, or request declarations of compliance
 - Suppliers may be asked to complete **self-assessments** or participate in sustainability evaluations
 - Non-compliance may result in warnings, corrective action requests, suspension, or contract termination
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11. Grievance Reporting

If suppliers are aware of violations of this Code—by themselves or others—they must report it confidentially to:

 info@nirotechindia.co.in or compliance@nirotechindia.co.in

Reports will be kept confidential and handled fairly, without retaliation.

12. Acknowledgment & Commitment

All suppliers must review and sign this Code of Ethics and are expected to cascade the requirements to their sub-suppliers.



Approved By:

Mr. Anshul Rai

Director, Nirotech Industries Pvt. Ltd.



Living Wage Policy

1. Purpose

At Nirotech Industries Pvt. Ltd., we are committed to ensuring that every employee receives a wage that supports a **dignified standard of living**, far beyond mere compliance with statutory minimum wages. This policy outlines our long-term commitment to achieving 100% coverage of **living wage payment** across our workforce, using a globally recognized methodology to benchmark our progress.

2. Definition of Living Wage

A **living wage** is defined as the minimum income necessary for a worker to meet the basic needs of themselves and their family, including food, housing, healthcare, education, transportation, and a modest margin for unforeseen expenses.

Nirotech benchmarks its living wage standards using the **WageIndicator.org's Typical Family Methodology**, which is considered a credible and data-driven tool that reflects regional and family-based wage needs in India.

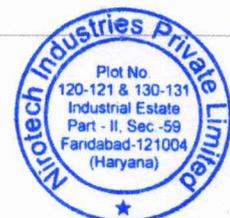
3. Scope

This policy applies to:

- All direct employees (permanent, temporary, and contract staff on Nirotech rolls)
- It also influences our expectations from manpower agencies and service providers operating within our premises

4. Benchmarking & Methodology

- Nirotech refers to the **WageIndicator.org – Typical Family Living Wage** values, updated annually, as its benchmark for different plant locations.
- Wages across employee categories are **annually reviewed and compared** against the benchmark values as part of our HR audit and ESG reporting process.
- Where gaps are identified, action plans are drawn to incrementally align compensation with living wage benchmarks while balancing business continuity.



5. Commitments

- **100% of employees** will be paid wages that meet or exceed the WageIndicator.org living wage benchmark by **FY 2035**.
- A minimum of **80% of employees** will be covered by living wage compliance by **FY 2030**.
- The company will ensure **transparency and traceability** in its wage data for verification during audits or ESG reviews.

6. Governance & Implementation

- Wage benchmarking data and alignment progress will be reviewed annually by the **HR Department** and the **Sustainability Officer**.
- Nirotech's internal wage matrix will be mapped against the living wage benchmarks as part of the **annual compensation review cycle**.
- Data will be recorded, tracked, and stored for validation during audits or customer requests.

7. Continuous Improvement

- This policy is not a one-time initiative. Nirotech views living wage payment as a **continuous and evolving responsibility**, reflecting our respect for workers and our leadership in ethical employment practices.
- Our HR team will collaborate with finance, plant leadership, and industry associations to **monitor cost-of-living trends**, revise wage structures, and promote internal equity in compensation.

8. Communication & Reporting

- The Living Wage Policy will be included in the **employee handbook**, supplier declarations, and **ESG annual reporting**.
- Any changes or progress on living wage coverage will be communicated to all employees transparently.

Approved By:

Anshul Rai

Director, Nirotech Industries Pvt. Ltd.

