

**Code of Ethics**

Gujarat Raffia Industries Limited has registered office at Plot No. 455, Santej-Vadsar Road, Santej, Tal: Kalol, Gandhinagar-381721. We hereby declare that "Gujarat Raffia Industries Limited" accepts and implements all the stated conditions by United Nation. It is committed to highest standards of product quality and business integrity. It also ensures that working condition in the organization is environmentally safe and socially responsible. It strongly believes that all the employees are deserved to be treated with dignity and respect. The company has full respect for and takes care of fundamental human rights, social justice human dignity, and respect for the equal rights of men and women.

Fundamental to adopting our Code is the understanding in all of its activities; it operates in full compliance with the laws, rules and regulations of the countries in which it operates. This code encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility. Gujarat Raffia Industries Limited maintains a series of detailed Standards that clarify the expectations for compliance

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### **1. Supplier Relationships:**

Gujarat Raffia Industries Limited meets the expectation of UN- the principle applied to suppliers, parent entities and subsidiary or affiliate entities, as well as all others with whom they do business including employees, subcontractors and other third-parties, it also ensures that this Code of Conduct is communicated to the employees and subcontractors of all suppliers, and, done in a local language and in a manner that is understood by all.

### **2. Promoting the Principles of this Code of Conduct:**

Gujarat Raffia Industries Limited will establish and maintain appropriate management systems whose scope is related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. All principles contained in this Code of Conduct are of equal importance independently of their order of appearance. The company will strongly encourage in operations of the its principles and will annually communicate their progress to stakeholders.

### **3. Subcontracting:**

Gujarat Raffia Industries Limited encourages and also works with there own suppliers and subcontractors and also ensures that they also strive to meet the principles of this Code of Conduct or equivalent set of principles.

### **Labor:**

#### **4. Freedom of Association:**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Gujarat Raffia Industries Limited respects the rights of workers to associate freely and to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

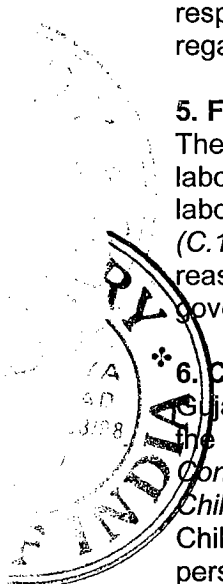
#### **5. Forced Labor:**

There is a prohibition to any use of forced, bonded or indentured labor or involuntary prison labor, and embrace employment practices consistent with ILO conventions pertaining to forced labor: *Forced Labour Convention, (c.29-1930)* and *Abolition of Forced Labor Convention, (C.105-1957)*. All work, including overtime work, is voluntary and workers are free to leave upon reasonable notice. Gujarat Raffia Industries Limited do not mandate that workers hand over government-issued identification; passports or work permits as a condition of employment.

#### **6. Child labor:**

Gujarat Raffia Industries Limited ensures that it is not engaged in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, *the ILO Minimum Age Convention (C.138-1973)* or *the Prohibition and Immediate Elimination of the Worst Forms of Child Labor Convention (C. 182-1999)*.

Child Labor is not to be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 15 or 14 where the law of the country permits, or under the age for completing compulsory education, or under the minimum age for employment in the country. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform hazardous work and may be restricted from night work with consideration given to educational needs.



#### **7. Discrimination:**

There is to be no discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical/pregnancy tests that could be used in a discriminatory way. Workers with disabilities will be provided reasonable job accommodations as needed to perform their job function. Consistent with the principles espoused in ILO Conventions on Discrimination (Discrimination (Employment and Occupation) Convention, C.111-1958) and Equal Remuneration (Equal Remuneration Convention, C. 100-1951), GRIL also discourages discrimination regarding access to training, promotion, and rewards.

#### **8. Working Hours:**

Gujarat Raffia Industries Limited comply with all applicable working hour requirements as established by local law, and our organization never exceed 60 hours per week, including overtime, except in emergency or unusual situations. It also ensures that all overtime work is voluntary and compensated at the prevailing overtime rates. The organization also ensures that workers are provided with one day off in every seven-day week.

#### **9. Compensation:**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Any disciplinary wage deductions are to conform to local law. The basis on which workers are being paid is to be clearly conveyed to them in a timely manner.

#### **Human Rights:**

#### **10. Human Rights:**

Gujarat Raffia Industries Limited supports and respects the protection of internationally proclaimed human rights and also ensures that they are not complicit in human rights abuses.

#### **11. Harassment, Harsh or Inhumane Treatment:**

Gujarat Raffia Industries Limited strongly believes that all the employees are deserve to be treated with dignity and respect. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment.

#### **12. Health and Safety:**

Gujarat Raffia Industries Limited strictly follows all relevant legislation, regulations and directives in country in which they operate to ensure a safe and healthy workplace or any other location where production or work is undertaken. At a minimum, our organization strive to implement recognized management systems and guidelines such as the *ILO Guidelines on Occupational Safety and Health (ILO-OSH-2001)* which can be found at ILO's website and ensure reasonable access to potable water and sanitary facilities; fire safety; emergency preparedness and response; industrial hygiene; adequate lighting and ventilation; occupational injury and illness and machine safeguarding. GRIL ensure the same standards are applied to any dormitory or canteen facilities.

#### **13. Mines:**

Gujarat Raffia Industries Limited is not engaged in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

## **Environment:**

### **14. Environmental:**

Gujarat Raffia Industries Limited has an effective environmental policy and also complies with existing legislation and regulations regarding the protection of the environment. GRIL wherever possible supports a precautionary approach to environmental matters, undertakes initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

### **15. Chemical and Hazardous Materials:**

Chemical and other materials posing a hazard if released to the environment is identified and managed to ensure that there is safe handling, movement, storage, recycling or reuse and disposal.

### **16. Wastewater and Solid Waste:**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are monitored, controlled and treated as required prior to discharge or disposal.

### **17. Air Emissions:**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterized, monitored, controlled and treated as required prior to discharge.

### **18. Minimize Waste, Maximize Recycling:**

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

## **Bribery and Corruption:**

### **19. Corruption:**

Gujarat Raffia Industries Limited adheres the highest standard of moral and ethical conduct, to respect local laws and is not engaged in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum.

Gujarat Raffia Industries Limited is not involved in any form of corrupt practices which includes any payment by employees, consultants, agents, intermediaries, acting by or on behalf of the company, extortion, fraud, bribery etc and Gujarat Raffia Industries Limited also believes in guiding rather giving training to there employees who is involved with UN. The company GRIL gives training in context to ANTI CORRUPTION and company's code of conduct. The training is given on regular interval basis every 15 days or on a monthly base as on requirement.

### **20. Conflict of Interest:**

Gujarat Raffia Industries Limited strongly believe in transparency and would disclose any situation that may appear as a conflict of interest, and disclose to the UN if any UN official or professional under contract with the UN may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.



### **21. Gifts and Hospitality:**

Gujarat Raffia Industries Limited respects that, the UN has a "zero tolerance" policy and does not accept any type of gift or any offer of hospitality. The UN will not accept any invitations to sporting or cultural events, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. The UN will not accept any benefit such as free goods or services or a work position or sales opportunity to a UN staff member in order to facilitate the suppliers business with the UN.

### **22. Post employment restrictions:**

Gujarat Raffia Industries Limited respects that, Post-employment restrictions apply to UN former staff members and to staff in service who participated in the procurement process, as well as to UN suppliers. For a period of one year following separation from service, former staff members are prohibited from seeking or accepting employment, from a UN supplier. Staff members in service must also refrain from accepting any future employment from a UN supplier, with whom they have been involved with. In case of violations of these provisions, UN Suppliers may be subject to having their registration as a qualified supplier with the United Nations barred, suspended or terminated.

### **23. Management System:**

Gujarat Raffia Industries Limited have establish a management system whose scope is related to the content of this Code and proportional to a Supplier's environmental and social accountability profile. The management system has been designed to ensure (a) compliance with applicable laws and regulations; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It also facilitates continual improvement.

The management system contains the following elements:

- 1. Company Commitment:** Corporate social and environmental responsibility statements affirm the Supplier's commitment to compliance and continual improvement.
- 2. Management Accountability and Responsibility:** Clearly identified company representative[s] are responsible for ensuring implementation and periodic review of the status of the management systems.
- 3. Legal and Customer Requirements:** Identification, monitoring and understanding of applicable laws, regulations and customer requirements is very important for our organization.
- 4. Risk Assessment and Risk Management:** Process to identify the environmental, health and safety and labor practice risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to ensure regulatory compliance to control the identified risks.
- 5. Performance Objectives with Implementation Plan and Measures:** Written standards, performance objectives, targets and implementation plans including a periodic assessment of Supplier's performance against those objectives.



**6. Training:** Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives have been given on a regular interval i.e. once in 15 days or on a every month base depends on the requirement.

**7. Communication:** Process for communicating clear and accurate information about Supplier's performance, practices and expectations to workers, suppliers and customers.

**8. Employee Feedback and Participation:** Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

**9. Audits and Assessments:** Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

**10. Corrective Action Process:** Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

**11. Documentation and Records:** Creation of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

I also would like to state that the entire UN business is handled by the company's Managing director Mr. Pradeep Bhutoria and his daughter Miss Sneha Bhutoria. They have been very much aware about the company's policies and practices and have been always present for the company's code of conduct training.

It is hereby declared by the Government of India and us that particulars given above is true.

Herein before written by:

