SUPPLIER CODE OF CONDUCT POLICY

OF

LLOYDS METALS AND ENERGY LIMITED

(CIN: L40300MH1977PLC019594)

Registered Office: Plot No. A 1-2, MIDC Area, Ghugus, Chandrapur, Maharashtra - 442505

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The Policy shall be maintained through the following revision and approval record:

Revision No.	Date of Approval
R0	01-11-2024
R1	03-11-2026

The Policy shall be approved by the Board of Directors and shall be reviewed periodically to ensure its continued relevance and effectiveness.

1. Introduction

Lloyds Metals and energy Limited strongly believes that its suppliers are essential to its ecosystem and is committed to building business relationships based on integrity, transparency, mutual respect and responsible business conduct.

This Supplier Code of Conduct (“SCOC” or “Code”) establishes the standards and expectations applicable to Suppliers and seeks to promote ethical business practices, respect for human rights, safe and healthy workplaces, environmental responsibility and compliance with applicable laws and regulations throughout the supply chain.

The Code is structured around six key areas: Ethics and Compliance; Labour Practices and Human Rights; Health and Safety; Environment and Community; Management Systems; and Reporting Concerns. This Code acknowledges the themes of human rights, labor, environment, and anti-corruption as outlined in the United Nations Global Compact (UNGC). More details about these principles can be found on the UNGC website: https://www.unglobalcompact.org/. The principles and norms related to 'labor' are based on the standards periodically set by the International Labour Organization (ILO).

This SCOC should be interpreted in conjunction with any other codes, policies, or guidelines that Lloyds may have in place for its Suppliers. In the event of any overlap, the most stringent stipulations will apply when considering all such codes, policies, or guidelines together. The compliance requirements outlined in this SCOC may vary based on the jurisdictions in which the Suppliers operate or conduct their business. Suppliers are therefore responsible for adhering to any regional variations and legal requirements applicable to them. Lloyds assumes no responsibility for ensuring the Supplier's compliance or for notifying the Supplier of such legal requirements.

2. Objective

The objectives of this Supplier Code of Conduct are to:

- Establish minimum standards of ethical conduct and responsible business practices for suppliers and business partners;
- Promote compliance with applicable laws and regulations;
- Uphold human rights, labour standards, environmental protection, health and safety, business integrity and responsible governance practices throughout the supply chain;
- Support sustainable value creation and responsible procurement decisions.

3. Scope and Applicability

This Supplier Code of Conduct (“SCOC”) outlines Lloyds' expectations from Suppliers and is applicable to the following companies:

1. Lloyds Metals and Energy Limited
2. Lloyds Engineering Works Limited
3. Lloyds Infinite Foundation
4. Lloyds Infrastructure & Construction Limited

Hereinafter collectively referred to as “Lloyds Group of Companies” (“Lloyds”).

For the purpose of this Code, the term “Supplier” refers to any entity or individual that provides or seeks to provide goods or services to Lloyds or its subsidiaries, including the Supplier's employees, agents and other representatives.

Lloyds has grouped its Suppliers into three primary categories:

3.1 Suppliers of Manpower

These are suppliers (both business and support) that provide manpower to Lloyds. The personnel supplied by these entities work at Lloyds and/or its client locations as an essential part of the workforce.

3.2 Suppliers of Services

These are suppliers that provide essential services at Lloyds locations, including but not limited to catering, food and beverage counters, transportation, and construction.

3.3 Suppliers of Goods

These are suppliers that provide products to Lloyds, including hardware, software, electrical/electronic equipment, furniture, heavy equipment, and stationery, across various Lloyds locations.

This Code applies to all Suppliers, contractors, subcontractors, consultants, service providers, agents, intermediaries and other business partners engaged by or on behalf of Lloyds.

Suppliers shall be responsible for ensuring that the relevant requirements of this Code are communicated to their employees, representatives, subcontractors and business partners engaged in providing goods or services to Lloyds.

4. Governance and Accountability

Lloyds expects its Suppliers to establish and maintain appropriate governance mechanisms, management systems and internal controls necessary to support compliance with this Code.

Suppliers shall remain responsible for complying with all applicable national and local laws, regulations, treaties, permits, licenses and industry standards relevant to their operations, products and services. Suppliers shall maintain adequate records and supporting documentation demonstrating compliance with the requirements of this Code and shall provide such information to Lloyds upon reasonable request. Suppliers shall be responsible for communicating the provisions of this Code to their employees, subsidiaries, agents, contractors, subcontractors and business partners involved in providing goods or services to Lloyds and shall take reasonable measures to ensure compliance. Compliance with this Code shall be considered an integral part of supplier engagement and business relationships with Lloyds. Suppliers are expected to cooperate with assessments, reviews, audits and monitoring activities conducted by or on behalf of Lloyds and shall promptly address identified gaps through appropriate corrective actions.

5. Policy Commitments

5.1 Ethics and Compliance

Lloyds has earned a well-established reputation for honesty, integrity, and fair dealings. Undoubtedly, this reputation is an essential aspect of our success. We expect our Suppliers to collaborate with us upholding the same level of integrity and ethical conduct.

5.1.1 Business Integrity and Ethics

As an Indian company, Lloyds is subject to all applicable anti-bribery and corruption laws, including, but not limited to, the Prevention of Corruption Act, 1988 (India), as amended from time to time. Suppliers must ensure compliance with relevant anti-bribery and corruption laws, both in letter and in spirit. Lloyds upholds a zero-tolerance policy towards any form of bribery and/or corruption. Such actions are contrary to our values. Lloyds does not permit bribery or corruption, nor do we allow third parties acting on our behalf,

including agents, consultants, suppliers, and contractors, to make any such payments. Suppliers must ensure the following:

● Implement monitoring and enforcement procedures to ensure compliance with anti-bribery and corruption laws;

● Raise invoices and claims in accordance with the agreed services and supplies, providing the necessary supporting documents. Conduct all business dealings transparently and maintain accurate records in business books;

● Never offer, directly or indirectly, any form of gift, entertainment, or anything of value on behalf of Lloyds, including to government officials, customers, or their representatives, with the intent to obtain or retain business, influence business decisions, or secure an unfair advantage;

● Abstain from offering any bribe, kickbacks and/or facilitation payments.

5.1.2 Conflict of Interest

This includes situations where a Lloyds employee or director may have any interest in the Supplier's business, whether through personal relationships, investments, directorships, or any other economic ties with the Supplier. In the event of a conflict of interest arising at the time of empanelment, or during or after engagement, Suppliers must promptly disclose such situations to Lloyds.

5.1.3 Quality and Product Responsibility

Suppliers must ensure that the quality of products and services delivered aligns with all contract terms and conditions. They must also comply with all applicable laws and regulations regarding the prohibition or restriction of specific substances, including the proper labelling of products, if required.

5.1.4 Fair Business, Advertising and Competition

Suppliers must uphold standards of fair business practices, advertising, and competition. They shall not engage in collusive bidding, price-fixing, price discrimination, or any other unfair trade practices that violate applicable antitrust laws.

5.1.5 International Trade

Suppliers must comply with all laws and regulations related to the export, re-export, import, or transfer of any controlled technology, products, and/or services. Specifically, Suppliers shall:

i. Adhere to laws and regulations governing commercial transactions with sanctioned or embargoed countries, individuals, or entities.
ii. Disclose any history of violations of export control laws or sanctions.
iii. Disclose any ongoing inquiry or investigation: (a) If information regarding the inquiry/investigation is available in the public domain; or (b) If such inquiry/investigation could impact the engagement with Lloyds.
iv. Ensure that Lloyds' products and/or services are not used or supplied to any sanctioned or embargoed country, individual, or entity.

5.1.6 Confidentiality

Suppliers must ensure that any confidential or proprietary information about Lloyds, our clients, employees, or other parties-gained through employment or affiliation with Lloyds-is not used for personal or

professional gain. This includes all confidential information, such as employee data, personal data, or third-party information shared by Lloyds.

5.1.7 Intellectual Property Rights

Suppliers shall take all steps to adhere to the intellectual property rights of Lloyds including but not limited to the Lloyds copyrights, patents, trade secrets and trademarks.

5.1.8 Data Privacy

Lloyds, along with its subsidiaries, ensures compliance with all applicable data protection laws and contractual requirements. We are committed to upholding the highest standards of data protection and privacy concerning all Supplier data and Personally Identifiable Information (PII), also referred to as Personal Data. We expect our Suppliers to adhere to similar standards when processing such Personal Data, including sensitive personal information.

When the Supplier is an independent controller, they must comply with local laws regarding the processing of personal data. When the Supplier is acting on behalf of Lloyds, they must comply with all obligations under applicable Data Protection Laws and Regulations. The Supplier must also adhere to the Data Processing Clauses and standard contractual clauses related to the processing of personal data and implement adequate technical and organizational security measures. These measures should address data subjects' rights, data transfer, retention, and deletion while processing personal data owned, controlled, and managed by Lloyds.

The Supplier must inform Lloyds of any data breach within 48 hours of discovery by emailing lloyds@integirtymatters.in. The Supplier is expected to fully cooperate with Lloyds and provide reasonable access to data processing facilities for investigations into the reported data breach.

5.1.9 Conflict Minerals

Suppliers must comply with all applicable Conflict Minerals rules and regulations and exercise appropriate due diligence when sourcing such minerals. Suppliers are expected to adopt policies and procedures that are effectively designed to prevent products or parts that are not responsibly sourced from entering Lloyds’s supply chain.

5.1.10 Information Security

Lloyds has a holistic Supplier Information security risk assurance process which helps in identification of Information security risks through different stages of supplier relations with the end objective of safeguarding critical & sensitive information; and information systems handled by suppliers. Lloyds expects its suppliers to comply with the applicable laws and regulations and Lloyds security requirements as communicated from time to time and included under the agreement.

Supplier organization is responsible for agreeing on service deliverables, ensuring compliance against contractual security requirements, extending support on annual security assessments, ensuring timely notification of incidents and notifying major changes/vulnerabilities to Lloyds. Supplier is expected to comply with the following as applicable:

a. Ensure that adequate security controls and practices are implemented and maintained effectively to ensure sufficient protection of Confidentiality, Integrity, and availability of i) Services provided to Lloyds and ii) Lloyds or Lloyds' client data processed or stored by the service provider.

b. Upon becoming aware of any security incident/breach involving Lloyds or Lloyds' client data, notify Lloyds within 48 hours on lloyds@integritymatters.in

5.1.11 Business Continuity

The Supplier must ensure that they have plans and procedures in place to resume business in the event of any physical disaster (e.g., fire, flood, wind, earthquake, explosion) or work stoppage (e.g., labor strike, economic/social disruption). Subject to mutual agreement on the terms of the business continuity plan by both parties, the Supplier shall resume services within the committed timelines following any disaster or work stoppage event.

5.1.12 Insider Trading

Lloyds complies with the SEBI (Prohibition of Insider Trading) Regulations, 2015. During the course of engagement, if the Supplier becomes aware of any Unpublished Price Sensitive Information ("UPSI") related to Lloyds, the Supplier must ensure:

(a) Not to disclose UPSI to anyone inside and/or outside Lloyds including family and friends

(b) Not to trade in the securities (equity /derivatives) of Lloyds either through self or through Portfolio Investment Servicer provider or through immediate relatives till such UPSI is available in public domain

5.1.13 Lloyds Brand Name, Logo and Media Rights

Our logo is the most prominent symbol of our products, platforms, and services. Suppliers must ensure the following:

● All usage of the Lloyds logo must strictly adhere to Lloyds' brand guidelines, including color, appearance, and size.

● All representations of the Lloyds brand, including but not limited to case studies, brochures, and advertisements, must comply with the established brand guidelines.

● Suppliers shall not use the Lloyds brand name, logo, or any other visual elements implying or representing Lloyds without explicit consent.

Suppliers shall not make any comments about their engagement with Lloyds in the media without prior approval. Any media reports or comments, as well as details of their usage, must be submitted to Lloyds for approval before being released.

5.1.14 Third Parties Engaged by Suppliers

If Suppliers engage any third party to provide services or goods to Lloyds, they must ensure that the third party adheres to the SCOC and does not engage in any activities that violate its terms. Suppliers are responsible for monitoring the compliance of such third parties and ensuring that their actions align with all applicable laws and regulations.

5.1.15 Compliance with Laws

Suppliers must fully comply with all applicable national and/or local laws and regulations, treaties, and industry standards, including, but not limited to, those related to labor, immigration, health and safety, and the environment. Suppliers shall maintain all records of such compliance as required by applicable laws and provide these records to Lloyds upon request.

5.2 Labour Practices and Human Rights

Lloyds is committed to uphold human rights of the workers and treating them with dignity and respect.

5.2.1. Wages and Benefits

Suppliers must comply with all applicable wage laws and regulations, including but not limited to minimum wages, payment duration, overtime hours, equal remuneration, and other compensation elements. All legally mandated benefits, such as leaves, social security, insurance, etc., must be provided to employees. Any wage deductions must be made in strict compliance with applicable laws and shall not be used as a disciplinary measure.

5.2.2. Working hours

Suppliers must comply with all applicable laws and regulations regarding working hours, minimum wages, overtime, and maximum hours. Suppliers should conduct their business in a way that limits overtime to a level that ensures humane and productive working conditions.

5.2.3. Child Labour

Suppliers must not employ, engage, or otherwise use any form of child labour. Lloyds expects its suppliers to avoid any practices that are inconsistent with the rights outlined in the Convention on the Rights of the Child, the ILO Minimum Age Convention, and the Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention. The term "child" refers to any person employed under the age of 18, or under the age required for completing compulsory education, or under the minimum legal age for employment in the country, whichever is greatest.

5.2.4. Forced or compulsory labour/Human Trafficking

Suppliers must not engage in any form of forced, bonded, or compulsory labour, slavery, or human trafficking within their supply chain. All employment with Suppliers must be voluntary, and employees should be free to leave their employment in accordance with applicable laws. Suppliers shall not confiscate or request workers to surrender any government-issued identification, passports, or work permits as a condition of employment unless required by law. Workers should not be required to pay recruitment fees or any other related fees for their employment.

5.2.5. Human Rights

Lloyds expects its Suppliers to support and respect the protection of internationally recognized human rights and ensure that they are not complicit in human rights abuses. Suppliers must not tolerate any form of harsh or inhumane treatment, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, including threats of such treatment. Suppliers must clearly define and communicate their disciplinary policies and procedures to workers. Additionally, Suppliers must have a written policy that prohibits any form of discrimination, harassment, or bullying, and provide a grievance mechanism to address any concerns raised by employees.

5.2.6. Non-Discrimination

Suppliers must not discriminate in hiring or employment practices based on pregnancy, childbirth or related medical conditions, race, religious creed, color, sex, gender, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, union membership, or any other criteria protected by law. Suppliers must always uphold the dignity of their employees and work towards establishing and reinforcing a positive and inclusive work culture.

5.2.7. Freedom of Association and Collective Bargaining

Lloyds expects its Suppliers to respect and recognize the rights of its employees to freely associate, organize and bargain collectively.

5.2.8. Harassment

Lloyds expects its Suppliers to provide a harassment-free workplace for all individuals. Harassment based on any protected criteria is unlawful, and Suppliers must ensure that no actions violate applicable laws. Lloyds has a zero-tolerance policy for any form of harassment, including sexual harassment. Suppliers must take appropriate steps to create a harassment-free workplace, including publishing policies, conducting periodic training, and providing timely support to affected parties. Suppliers should also organize regular awareness programs to sensitize employees about harassment laws in the relevant jurisdiction.

5.3. Health and Safety

Lloyds expects its Suppliers to provide a safe and healthy workplace for their employees, in full compliance with all applicable laws and regulations. Suppliers must ensure that their workplace meets all safety and health requirements, including compliance with occupational safety laws, emergency preparedness, occupational injury and illness management, industrial hygiene, machine safeguarding, sanitation, food, and housing standards. Suppliers must take appropriate measures to minimize hazards inherent in the working environment. Additionally, Suppliers must address substance abuse issues by prohibiting the use, possession, distribution, or sale of illegal drugs within their supply chain.

5.4.Environment and Community

Suppliers must develop, implement, and maintain environmentally responsible business practices. Lloyds expects its Suppliers to adhere to Lloyds' standards on environmental protection and work toward the following objectives while transparently reporting on their efforts:

● **Environment Protection:** Suppliers shall comply with all applicable laws and regulations concerning environmental protection and the promotion of sound environmental practices. They should adopt a precautionary approach to addressing environmental hazards. Suppliers are encouraged to develop and implement a comprehensive environmental protection policy, taking on greater environmental responsibility and fostering an environmentally conscious culture within their organizations and throughout their value chains. It is also recommended that Suppliers adopt a life cycle-based approach to their operations and associated practices.

● **Energy and Emissions:** Suppliers shall monitor and track their energy usage, taking the necessary actions to enhance energy efficiency. It is recommended that Suppliers adopt measures to diversify their energy mix by incorporating renewable energy sources, thereby reducing their reliance on fossil fuels.

● **Water:** Suppliers shall extract water only from legally authorized sources. They are encouraged to adopt and promote the recycling and reuse of water, as well as improve water efficiency. It is also desirable for Suppliers to implement water conservation initiatives, such as rainwater harvesting, wherever feasible.

● **Waste and Effluent Management**: Suppliers shall ensure that the wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are properly monitored, controlled, treated, and disposed of in accordance with the regulations set by the relevant authorities or governing bodies.

● **Hazardous Materials:** Suppliers shall ensure that chemicals and other materials that pose hazards to human health and the environment are identified and managed responsibly. This includes their safe handling, transportation, storage, recycling, reuse, and disposal.

● **Responsible Production and Consumption:** Suppliers are encouraged to take proactive steps to promote responsible production and consumption. This includes phasing out harmful materials and using raw materials that are less damaging to the environment whenever possible. Suppliers are also encouraged to promote the recycling and reuse of materials and products.

● **Resource Efficiency:** Suppliers shall ensure and promote resource efficiency i.e. designing products and processes in a way that allows more efficient usage of raw materials and water.

● **Air Emissions:** Suppliers shall consistently monitor and track Greenhouse Gases (GHGs) and other air emissions, including volatile organic compounds (VOCs), aerosols, corrosives, particulate matter, ozone-depleting substances, and combustion by-products generated from their operations. Suppliers must comply with emission regulations and standards set by the relevant regulatory authorities. It is recommended that Suppliers develop and implement measures to reduce harmful air emissions.

● **Biodiversity:** Suppliers shall take proactive measures to minimize their impact on ecosystems, contributing to the preservation and restoration of biodiversity. It is encouraged that Suppliers adopt practices to prevent deforestation and actively support the protection and restoration of forests and natural habitats.

Suppliers must ensure their operations align with community stakeholders and do not infringe upon land, forest, or water rights of the community.

5.5.Management System

5.5.1 Management System:

Lloyds is certified to ISO 9001, 14001, and 45001 and has committed to an ESG Vision 2030. Lloyds has also adopted the requirements of GRI Standards and BRSR. We encourage our suppliers to obtain relevant industry- specific certifications, including ISO certifications, and to make sustainability/ESG disclosures in accordance with the standards. ISO certifications, ESG disclosures, associated ratings, and periodic upgrades that demonstrate strong practices in these areas will be key considerations in fostering long-term business relationships with Lloyds.

Suppliers must establish a management system and maintain the necessary documentation to demonstrate compliance with the SCOC. This system should be designed to ensure (a) compliance with applicable laws and regulations, (b) conformance with the SCOC, and (c) the identification and mitigation of operational risks related to the SCOC.

5.5.2 Obligations of Suppliers

Suppliers must ensure that the SCOC is communicated to their employees, subsidiaries, business partners, and subcontractors involved in providing services to Lloyds, in a language they understand, and that they comply with the code. Compliance with the SCOC is required in addition to any other obligations outlined in agreements between the Supplier and Lloyds.

Suppliers are responsible for self-monitoring and demonstrating their compliance with the SCOC. They must actively audit and manage their daily operations and provide reports to Lloyds upon request.

Lloyds reserves the right to conduct audits, with prior notice to Suppliers. These audits may include, but are not limited to, Environmental, Social, and Governance (ESG) parameters, sustainability, social compliance, modern slavery, information security, business continuity, statutory and regulatory compliance, and adherence to other contractual commitments (e.g., SLAs, delivery quality).

Such audits may be conducted physically at the Supplier's premises, virtually, or in a hybrid mode (partially physical and partially virtual), either by Lloyds or a designated third party. Suppliers must support these audits in accordance with the outlined scope. Adherence to audit timelines, production of relevant documents, and submission of corrective actions with appropriate evidence for all audit findings within the specified timelines are mandatory. While Lloyds will work with Suppliers to improve compliance, failure to cooperate or meet audit requirements may result in appropriate actions, including but not limited to the termination of services with the Supplier.

5.6. Reporting Concerns

If you suspect any violation of this SCOC, you can report it through http://lloyds.integritymatters.in or the Lloyds Helpline numbers provided on the link.

For matters unrelated to data breaches or sexual harassment, you can report concerns to lloyds@integritymatters.in

Grievances relating to sexual harassment should be raised in writing to lloyds@integritymatters.in

Any data breach and/or cybersecurity incidents involving Lloyds or its customer data must be reported in writing to lloyds@integritymatters.in within 48 hours of discovery.

It is crucial to report all suspected violations, including retaliation. Retaliation includes any adverse actions, harassment, or discrimination related to your reporting of a suspected violation. Lloyds is committed to maintaining confidentiality to the extent possible and will not tolerate any form of retribution or retaliation against individuals who, in good faith, seek advice or report questionable behaviour or potential violations of the SCOC. Lloyds is dedicated to fairly assessing all concerns raised and providing resolutions.