



## **SBCC LOGISTICS PVT. LTD.**

### **CODE OF CONDUCT**

Our organization brings people together from a wide range of cultural backgrounds – all with different skills and viewpoints. The diversity of our workforce and close relationship to customers, suppliers and numerous of organizations around the Maharashtra are fundamental to our strength and success. With a workforce comprising some 9 employees in Maharashtra, and we rely on a common understanding of how we expect all of us to conduct the company's business and what it means to act responsibly and with integrity.

Our Code of Conduct defines clear ethical standards for the **SBCC LOGISTICS PVT. LTD.** and spans the entire spectrum of our daily work and operations. It includes quality management, customer relationships, workplace conduct, business integrity as well as social responsibility. The rules and guidelines defined by the Code of Conduct provide us with the necessary foundation to ensure a consistent high standard in which we conduct our business and day-to-day operations in the Maharashtra – towards our customers, vendors, internally and other stakeholders.

The Code of Conduct also communicates to our customers and the public that the **SBCC LOGISTICS PVT. LTD.** is a reliable, trustworthy persons that combines first-class service with a strong sense of responsibility.

This updated and expanded Code of Conduct provide us with a success story of our high business standard which we can be proud of. It is necessary that all employees support and work accordingly to our high ethical standard in order to maintain Shree Balaji Cargo Carrier integrity and long-term success.

The Executive Management by

Mr. Sushil Kumar Tiwari  
DIRECTORE





**ABC Code of Conduct**

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The Code of Conduct is binding for all employees in Maharashtra of the **SBCC LOGISTICS PVT. LTD.** and each of us can contribute to the success of our company by living the Code of Conduct.

This Code describes the objectives and rules that reflect our commitment to responsible, ethically irreproachable and legally compliant behavior. The letter and spirit of this Code correspond to the Group-wide rules and regulations that govern our business lives each day and shape our culture.

The **SBCC** constantly deals with a variety of people and organizations and representatives of diverse interests. Our image as a company depends on how you conduct yourselves in the business world. When faced with a difficult situation, consider these questions:

If the answer to each of the below questions is "yes", the action or decision complies with the following principles of conduct and is most likely the correct one.  
If you are not sure, ask. And keep asking until, you are sure!

### 1. WHAT IS CORRECT CONDUCT?

1. Is my action or decision legal?
2. Does it comply with the letter and spirit of this Code and other Group policies?
3. Is it right and free of any personal conflicts of interest?
4. Could my action or decision withstand public review (social media, newspaper etc.)?
5. Will my action or decision protect the reputation of the Shree Balaji Cargo Carrier as a company with high ethical standards?

### Laws and Ethical Standards

The **SBCC LOGISTICS PVT.LTD.** strives for sustainable development of its business founded on economic performance and corporate responsibility. We honor the diverse interests of our customers, employees and business partners with integrity, fairness and honesty. We strive for excellence in our business development and ethical behavior. We operate our business with integrity and comply with all laws applicable to our business in all regions and countries. We recognize that laws and ethical standards may vary from country to country according to national differences.



## **Human Rights**

The **SBCC LOGISTICS PVT.LTD.** is guided by the principles of the United Nations Global Compact. We respect the principles of the 1998 International Labor Organization “Declaration on Fundamental Principles and Rights at Work” in accordance with national law and practice. We respect human rights within our sphere of influence and conduct our business in a manner that makes the company an attractive workplace. We are deeply committed to the elimination of all forms of forced or compulsory labor and to the effective abolition of child labor.

# **1 CODE OF BASIC HUMAN RIGHTS AND WORKING CONDITIONS**

**SBCC** is committed to creating and maintaining an environment in which all employees are treated with integrity and respect, and differences are highly valued. By creating a corporate culture in which harassment or discriminatory treatment of any form is not tolerated, we can give every employee the opportunity to contribute fully to the business success of **SBCC**. We respect international conventions aimed at promoting and protecting human rights including the Universal Declaration of Human Rights. This code of conduct supports our commitment to diversity, equality, and the recognition and protection of fundamental human rights in the workplace.

## **Child Labor**

We will not use child labor. In no event will we employ any person below the age of 18, unless it is part of a government-authorized job training or apprenticeship program that would be clearly beneficial to the persons participating.

## **Compensation**

We will promote our employees’ material well-being by providing compensation and benefits that are competitive, fair and comply with applicable law.

## **Forced Labor**

We will not use forced labor, regardless of its form. We will not tolerate physically abusive disciplinary practices.

## **Freedom of Association and Collective Bargaining**

We recognize and respect our employees’ right to associate freely and bargain collectively. We will work constructively with recognized representatives to promote the interests of our employees. In all locations, whether represented by unions or not, we will seek to provide opportunities for employee concerns to be heard.

## **Harassment and Discrimination**

We will not tolerate harassment or discrimination on the basis of sex, race, color, creed, religion, age, ethnic or national origin, marital/parental status, disability, sexual orientation, or veteran status.

## **Environment, Health and Safety**

We will provide and maintain for all employees a safe and healthy working environment that



meets or exceeds applicable standards for occupational safety and health, and our operations will accomplish their functions in a manner that provides for protection of the world's environmental resource base including but not limited to clean fresh water which we recognize as a basic human right.

### **Work Hours**

We will comply with applicable law regulating hours of work.

### **Responsibility and Implementation**

**SBCC's** Director will have oversight and receive periodic reports from the General Counsel regarding compliance with this Code. We will provide training and make this Code of Basic Human Rights and Working Conditions available to all employees. As appropriate under local practice, we will seek the support and assistance of unions and employee representatives in this effort. We will require that our business partners throughout our supply chain also adopt and enforce similar workplace codes of conduct. We will seek to identify and utilize business partners who aspire in the conduct of their business to standards that are consistent with this Code. Reports of violations or suspected violations of this code of conduct can be made anonymously by calling +91-22-25438813 or via [www.sbcc.net.in](http://www.sbcc.net.in). No negative action will be taken against any employee for providing information in good faith.

## **2. OUR ETHICAL COMMITMENT**

### **Quality Focus**

High quality is an integrated part of the SBCC LOGISTICS PVT.LTD. core business. In order to achieve the highest quality standards, we constantly work to improve our structures and processes for the benefit of our customers. This applies not only to our products, services and management but also to our behavior.

### **Customer Satisfaction**

We place high priority on making our customers successful, in line with our belief that successful customers guarantee our own success. Our activities are governed by our knowledge of the global and local requirements of our customers and markets. We include and prioritize customer focus in our business processes, projects and interactions.

We know that we are measured by our ethical, social and environmental performances as much as the quality of our service. We therefore strive for best practice in all of these areas to secure customer trust.

### **Transparency**

We are committed to openness in our interactions with our customers, investors, employees, suppliers, business partners and other organizations and institutions. Transparency and honesty are the key to all our communication activities, internally and externally. The public have access to information on our website.



**Business Partner Dialogue**

We are committed to dialogue and partnership with our business partners throughout the Maharashtra. We share principles of ethical behavior, social engagement and respect for the environment with our suppliers, subcontractors, agents and consultants. We communicate our principles to our business partners and encourage them to adhere to the same standards as us.

**3. OUR BUSINESS PRACTICES.**

**Individual Responsibility and Involvement**

The skills and commitment of our employees are our greatest assets. We expect our employees to conduct their business in an entrepreneurial way and accept their individual responsibility. We endeavor to involve our colleagues in our projects and decision-making processes in order to achieve our common goals with reliability and commitment.

**Mutual Respect and Openness**

It is part of our culture that all relations between Owner and employees of all levels and shall be guided by mutual respect, openness, honesty and the spirit of trust and cooperation. We give and seek feedback and we communicate actively and openly with each other. We are committed to a fair and open debate and seek varying opinions. We encourage our colleagues to express their ideas and concerns. Team spirit is fostered by open-mindedness.

We never encourage or direct our employees to achieve business results at the expense of compliance with the law, ethical standards or with this Code of Conduct. The **SBCC LOGISTICS PVT.LTD.** does not tolerate any kind of violence in the workplace, including but not limited to threatening and intimidating behavior. Each employee is required to contribute to an environment of respect that precludes any kind of harassment, including workplace bullying, unwelcome sexual advances, unwanted physical contact, inappropriate propositions or a working environment tainted with harassing jokes, words or demeaning comments. We recognize and respect the right to collectively bargain in accordance with applicable law.

**Diversity**

We consider the diversity of our employees as a strength. We promote an inclusive work environment in order to attain the highest possible productivity, creativity and efficiency. The main criteria for employee selection and promotion are skills and qualification. We do not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

**Health and Safety at Work**

We firmly believe that the well-being and safety of our employees are essential to our financial success. We are therefore committed to compliance with our health and safety policies. We strive to foster the physical and psychological well-being of our employees. Our goal is to support a work culture which promote efficient and committed employees as well as fewer illnesses and a lower accident rate. We promote healthcare as a key element of our sustained productivity and the quality of our services. We establish shared values through our commitment to health and safety. Our health and safety policies include a ban on illegal drugs in the workplace.

**Company Property**

Each employee has a responsibility to safeguard and make proper use of the **SBCC LOGISTICS PVT.LTD.** property. The use of company property, including labor, supplies, equipment, buildings or other assets for personal benefit, is prohibited where not explicitly allowed by an agreement. Intellectual property is a valuable asset and must be protected from unauthorized use or disclosure. Such property includes trade secrets, confidential information, copyrights, trademarks, logos but also customer lists, business opportunities and product specifications whether owned by the S, affiliated companies or business partners.

**Legal Proceedings**

Employees must avoid activities that could involve or lead to the involvement of the **SBCC LOGISTICS PVT.LTD.** or its personnel in any unlawful practice including the employment of our personnel or use of company assets for illegal gain. Lawsuits, legal proceedings and investigations concerning the **SBCC LOGISTICS PVT.LTD.** must be handled quickly and properly in order to protect and defend the company. Employees who are threatened by a lawsuit or other legal proceedings or investigation in a business-related matter are required to contact the **SBCC LOGISTICS PVT. LTD.s'** Legal Department immediately.



**Accounting and Reporting Standards**

The **SBCC LOGISTICS PVT.LTD.** lies on the authenticity and accuracy of information recorded in its accounting records for proper decision making. It is of the utmost importance that records dealing with security and personnel, as well as accounting and financial data, are protected. All business transactions must be reflected accurately in our accounts in accordance with established procedures and auditing standards and generally accepted accounting principles. Accounting records will reflect and describe the nature of the underlying transactions.

**Conflicts of Interest**

We require all of our employees to maintain high ethical standards in handling conflicts of interest. Employees should disclose to a manager if they have a relationship with persons or firms with whom the **SBCC LOGISTICS PVT.LTD.** does business, which might give rise to a conflict of interest. Such relations include a relationship by blood or marriage, partnership, business partnership or investment.

**Fair Competition**

We are committed to free enterprise and fair competition. Company business must be conducted solely on the basis of merit and open competition. We will hire suppliers, agents or other intermediaries by careful and fair assessment only. We are legally bound to make business decisions in the best interests of the company, independent of any understanding or agreement with a competitor. The **SBCC LOGISTICS PVT.LTD.** and its employees will avoid any conduct that violates antitrust laws.

**Bribery and Corruption**

We trust that the excellence of our services is the key to our business success. Therefore we deal with all our customers, suppliers and agents in a transparent manner and in compliance with applicable anti-corruption and bribery laws.

**Gifts and Benefits**

Gifts and other benefits are permitted if they are considered usual business practice and ethical. None of our employees may solicit material gifts or other personal benefits from customers, suppliers, agents or other business partners. The giving and receiving of gifts and other benefits is prohibited in particular if they appear to influence upcoming business decisions or breach a law, regulation or policy.



## 4. OUR BUSINESS INTEGRITY.

### **Trade Regulations**

The **SBCC LOGISTICS PVT.LTD** believes that free trade increases prosperity and affluence throughout the world. While always seeking to comply with applicable laws, including sanctions and embargoes, we exist in order to serve customers – wherever they may be.

### **Data Protection**

Our employees shall not disclose information that is not known to the general public or personal gain or the benefit of anyone other than the company. Such information includes technical data, financial data, operating data, customer information, memoranda and other information regarding the company's business and operational activities and future plans. Employees shall adhere to relevant laws and company regulations with respect to personal data, especially that of customers and employees. The collection, processing and use of personal data of natural and (where legally equivalent) legal persons must be in line with the applicable laws.

## 5. OUR SOCIAL RESPONSIBILITY.

Our social responsibility is based upon our will to make a positive contribution to the society and the environment. We want to live up to our responsibility as a state based company and have therefore integrated corporate responsibility into our corporate strategy. This is further reflected through our commitment to fundamental charters and initiatives such as the Universal Declaration on Human Rights. We aim to act responsibly in all of our activities and apply our core competencies and the expertise of our employees to make our planet a better place. We are in continuous dialogue with our stakeholders to take their views as citizens and consumers into consideration when we run our business.

### **Social Responsibility**

We focus our efforts on improvements in areas in which we believe we can have the highest positive effect: environmental protection and socio-economic development. We advocate and support the spread of environmental and social standards throughout the world. We consider our employees' commitment and active involvement to be an important factor for our efforts to succeed. We support community development in partnerships with non-profit organizations. We recognize that we are measured by our actions outside the workplace and therefore call on our employees to respect the local culture and understand the issues of communities in which they work.

We acknowledge the impact of our business activities on the environment and are committed to improve our environmental track record through precautionary measures and the use of environmentally friendly technology. We have set ourselves a



measurable carbon efficiency target and regularly assess and monitor our impact on the environment.

By systematically identifying and leveraging ecological initiatives, we strive to support constant improvement of our environmental performance by means of environmental audits and risk management. We do this in order to use natural resources more efficiently. We measure our processes and services against the highest national environmental standards.

### **Where can you read more?**

We recognize that you may need help in understanding company policies, making difficult decisions, or helping the company to live up to its Code of Conduct. There are several options for you to take action:

### **Reporting a Violation**

We encourage you to speak up if you become aware of a potential issue of compliance with this Code of Conduct. You can consult to owner, or make use of our Compliance email ([sbcc\\_22@yahoo.com](mailto:sbcc_22@yahoo.com)) to report a violation of the Code of Conduct.

All reports of a violation of the Code of Conduct will be kept confidential. No employee will be disadvantaged in any way for efforts made in good faith to report a potential issue regarding compliance with this Code of Conduct. For the sake of an open working environment and a more efficient follow-up to your report, we encourage you to identify yourself when reporting a possible violation.

However, should you find it necessary to make an anonymous report, we will also accept such reports. If required by the applicable law, information regarding the identity of the employee reporting a possible violation must, however, be disclosed to the relevant persons or authorities involved in an investigation or subsequent judicial proceedings under certain circumstances.

### **Actions, Waivers and Changes to the Code of Conduct**

In case of non-compliance with this Code of Conduct, the company will take action and allocate the adequate resources to properly address the issue. First and foremost, the company will address the issue by explaining the importance of our Cod of Conduct to the employee(s) concerned to motivate a change of behavior.

However, employees who fail to adhere to this Code of Conduct may be subject to appropriate disciplinary action, as stated in the applicable regulations.

The company will not grant waivers from the requirements of the Code of Conduct without good reason. Waivers of provisions of the Code shall be granted by the Executive Management only.



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## 6. INFORMATION AND REPORTING CHANNELS, WAIVERS AND CHANGES TO THE CODE OF CONDUCT.

- Consult and talk to the directors.

## 7. RELATED POLICIES AND REGULATIONS, LOCAL CODES.

The Code of Conduct sets the principles for all policies and regulations relating to ethical conduct at the **SBCC LOGISTICS PVT.LTD.** Local Adjustments may be made to reflect special characteristics, although the substance of the current Code of Conduct must always be incorporated. Adjustments may be made to take local laws, customs and business practices into account. Local codes may include additional, specific policies or regulations. However, in no event shall any term contradict or be more lenient than this Shree Balaji Cargo Carrier Code of Conduct. All local codes shall be reviewed and approved by the Global Compliance Office.

**If you have questions related to the Code of Conduct, please contact US.**

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