



SANGHVI MOVERS LIMITED

Suppliers Code of Conduct

Doc. No.	SML-PIUR-POL-001
Rev. No.	00
Date of Rev.	16-04-2026



SUPPLIERS CODE OF CONDUCT

00	Initial Issue	16-04-2026	Vaijinath Borhade Manager - Supply Chain Management	Vaijinath Borhade Manager - Supply Chain Management	Satish Irale GM - Supply Chain Management
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“Safety First, Safety Always”

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Sanghvi Movers Limited (SML), India's largest crane rental company with over 450 cranes, is dedicated to providing reliable heavy lifting solutions for infrastructure, energy, and industrial projects. SML views sustainable procurement as essential for supply chain resilience, quality service delivery, and long-term value.

The Company emphasizes ethical sourcing, resource efficiency, and supplier accountability to build a robust supply chain. This Code outlines SML's expectations for ethical practices, compliance, and ESG responsibility. It aligns with Indian regulations (SEBI BRSR), UN Global Compact, ILO Conventions, and OECD Guidelines.

Scope

The code of conduct applies to all suppliers, contractors, subcontractors, vendors, agents, consultants, collaborators, third-party entities, and their representatives (hereinafter collectively referred to as 'Suppliers'), providing goods or services to SML.

The Supplier Code of Conduct ("The Code")

1. Environment

- Ensure adherence to all relevant environmental laws and regulations at the local, national, and international levels.
- Ensure efficient utilization of resources throughout the operations, prioritize waste reduction, and enhance the value of materials over their lifecycle.
- Track and monitor the air quality and take measures to control the emissions. Ensure compliance with relevant air quality standards and regulations.
- Track and monitor the water usage (withdrawal, consumption, and discharge) across the operations and implement measures to reduce water consumption and manage wastewater effectively.
- Take initiatives to optimize energy consumption by using energy-efficient processes and reduce emissions.
- Implement measures to reduce waste generation and adopt the 3R approach of reduction, reuse, and recycle.
- Encourage circular economy practices by reusing and recycling materials and lowering the harmful environmental impact.
- Bring down the greenhouse gas emissions and support carbon neutrality measures by tracking and monitoring both direct and indirect GHG emissions.
- Take proactive measures to reduce the carbon footprint and implement initiatives to offset carbon emissions and achieve carbon neutrality.
- Maintain all required environmental permits, approvals, and consents relevant to operations.
- Ensure safe handling, storage, transportation, and disposal of hazardous substances in accordance with applicable regulations.
- Environmental expectations shall be implemented in a manner proportionate to the nature, scale, and environmental impact of the supplier's operations.

2. Human Rights:

- Comply with all relevant local, national, and international human rights laws and standards.
- Ensure a safe and healthy working environment, fair wages, and working conditions for the employees and workers according to relevant regulations.
- Provide all mandatory health and safety training, according to the nature of work undertaken by individual employees and workers.
- Abstain from using child labor, coerced labor, contract or bonded labor, as well as modern slavery and human trafficking in any form.
- Enact policies and undertake measures to protect workers' rights and ensure minimum safety standards. Respect the right of freedom of association and collective bargaining.



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- Ensure an inclusive and diverse workplace which is free from discrimination based on race, gender, sexual orientation, disability, and characteristics.
- Implement a fair process for grievance redressal, disciplinary actions, and employment termination.
- Provide all required benefits to employees and workers, including social security, parental leave, and medical and insurance coverage.
- Establish measures for hazard identification, measurement, and mitigation process.

3. Product Quality and Safety:

- Make sure that the quality of products and services conforms to all contract terms and conditions.
- Ensure appropriate disclosure on products and services related to the environment and social safety.
- Implement measures for continuous improvements in product quality and service delivery.
- Maintain appropriate quality management systems and controls relevant to the nature of products or services supplied.
- Establish product traceability mechanisms and cooperate with SML in the event of quality incidents, recalls, or investigations.
- Promptly notify SML of any quality, safety, or compliance risks that may impact supplied products or services.

4. Business Integrity:

- Ensure compliance with all applicable business laws, regulations, and standards at the local, national, and international levels.
- Communicate any potential conflict of interest to the company that may affect business decisions or relationships.
- Maintain the highest standard of integrity and transparency in conducting business, ensuring zero tolerance for bribery, corruption, and any anti-competitive actions.
- Implement guidelines for data protection and privacy to protect sensitive information, personal data, and intellectual property.
- Keep accurate and complete records related to operations, compliance, and sustainability efforts. Make sure that records are maintained as per legal and regulatory requirements.
- Comply with applicable export control laws, sanctions regulations, and defence-related compliance requirements.
- Prohibit facilitation payments, kickbacks, and improper gifts, regardless of local practices.
- Cooperate fully with any investigation related to ethical or legal compliance.

5. Cybersecurity, Data Protection, Information Security, and Privacy (PII)

Suppliers shall establish, implement, and maintain robust cybersecurity and information security controls proportionate to the nature, sensitivity, and criticality of the data, Personal identifiable information, systems, Drawings, specifications, and services provided to SML.

Suppliers are required to:

- Comply with all applicable data protection, PII data, information security, and cyber laws, regulations, and contractual obligations, including requirements relating to defence, national security, and critical infrastructure, as applicable.
- Implement appropriate administrative, technical, and physical safeguards to protect information and systems from unauthorized access, disclosure, alteration, loss, or destruction.



- Ensure secure access controls, authentication mechanisms, encryption (where appropriate), and regular system patching and vulnerability management.
- Establish processes for continuous monitoring, detection, and timely response to cybersecurity incidents, breaches, or attempted intrusions.
- Promptly notify SML of any actual or suspected cybersecurity incident, data breach, or compromise that may impact SML's data, systems, or operations, and cooperate fully in investigation and remediation efforts.
- Restrict access to SML data strictly on a need-to-know basis and ensure that personnel overseeing such data are adequately trained on cybersecurity and information security practices.
- Prohibit the use of SML information systems, data, or networks for any unauthorized or unlawful purposes.

6. Data Security, Data Localization & Record Management

Where Suppliers process, store, transmit, or access data relating to SML, its customers, or defence projects, they shall:

- Ensure that sensitive, confidential data is stored, processed, and transmitted in accordance with applicable data localization, security, and regulatory requirements, as notified by competent authorities.
- Maintain secure data retention, backup, and disposal practices to prevent unauthorized access or data leakage.
- Not transfer, host, or process SML data outside approved jurisdictions without prior written consent, where applicable.
- Maintain accurate, complete, and secure records related to operations, compliance, cybersecurity, and data protection, and make such records available to SML upon request for audit or regulatory purposes.

7. Preferential Procurement:

- Preference should be given to domestic and indigenous suppliers, including MSMEs, subject to quality, security, and regulatory requirements.
- Preference shall be given to suppliers that demonstrate strong ethical practices, regulatory compliance, and adequate information security controls.

8. Grievance Redressal Mechanism:

- Establish a grievance redressal mechanism that will ensure all grievances are communicated confidentially and without the fear of retaliation.
- All grievances should be investigated in a fair manner and within a specified timeframe.
- Suppliers can report their complaints through SML's established channels. For reporting a grievance, contact us at sml.procurement@sanghviglobal.com. We also have a whistleblower mechanism available at www.sanghvicranes.com for reporting ethical and legal misconduct.



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Implementation of the Code:

- Suppliers must ensure compliance with the code and demonstrate adherence to their standards.
- SML may evaluate compliance with the code by using a comprehensive approach that includes self-assessment and declarations, audits, and thorough documentation review.
- Non-compliance with the provisions of the code may result in violation of the supplier's duties. In such circumstances, SML reserves the right to take necessary action, which may result in termination of the existing contract or suspensions/removals of non-compliant suppliers.

Suppliers acknowledge and agree that full compliance with this Supplier Code of Conduct is a mandatory condition of doing business with Sanghvi Movers Limited (SML). By entering into any contract, purchase order, or supply agreement—whether formal or informal—suppliers explicitly commit to upholding all provisions outlined herein, including environmental stewardship, human rights protections, product quality standards, business integrity, cybersecurity measures, intellectual property safeguards, data security protocols, and preferential procurement preferences.

Failure to comply—whether through violations, non-responsiveness to audits, or inadequate remediation—may result in immediate corrective action plans, suspension of orders, contract termination, or disqualification from future business opportunities. SML may also report egregious breaches (e.g., child labor or corruption) to relevant authorities and pursue legal remedies as permitted under applicable laws.