

25 December 2021



To our stakeholders:

I am pleased to confirm that SWANI RUBBER INDUSTRIES reaffirms its support of the Ten principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti corruption.

SWANI RUBBER INDUSTRIES is proud to be a responsible business organisation with a commitment of advancing fundamental human rights and responsible labor practices in operations. We are continually working towards a sustainable society with integrity and in unity with our customers, partners, communities and the interested parties around us. SWANI RUBBER INDUSTRIES comply with all applicable environmental legislation and regulations.

We have adopted policies that promote the well-being of society and the environment while reducing negative impacts on them. Being socially responsible we are committed and supporting different NGOs and other communities involved in social initiatives (eg. Green Peace India Society, Helpage India, Samarpan, etc)

In this communication on progress we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours

Rattandeep S Swani

Managing Partner

Human Rights

SWANI RUBBER INDUSTRIES has a policy in place for Human rights which is part of our management handbook and employee manual. Management of Swani Rubber industries emphasizes 100% implementation of policy at all levels of organization including stakeholders and interested parties.

HUMAN RIGHTS POLICY

SWANI RUBBER INDUSTRIES believe that business can only flourish in societies where human rights are protected and respected. We recognize that business has the responsibility to respect human rights.

This is an area of growing importance to our employees, workers, shareholders, investors, customers, consumers, the communities where we operate. There is therefore both a business and an ethical case for ensuring that human rights are upheld across our operations.

OBJECTIVES & GOALS

SWANI RUBBER INDUSTRIES conducts its business in a manner that respects the rights and dignity of all stakeholders, complying with all applicable laws and regulations. Our policies reflect our commitment to respect the protection of internationally recognized Human Rights.

- All employment with SWANI RUBBER INDUSTRIES is voluntary. We do not use child or forced labor in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers. We fully respect all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labor worldwide.
- SWANI RUBBER INDUSTRIES abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- We respect our employees' right to choose to join or not join a trade union, or to have recognised employee representation in accordance with local law.
- We believe everyone should be treated with respect regardless of their background.
- Our Supply Chain Management System (suppliers, vendors, contractors, consultants and agents) are required to adhere to Swani's Labour standards and Code of Conduct policies.

In addition to this, SWANI RUBBER INDUSTRIES is committed to the following principles:

SWANI RUBBER INDUSTRIES respects all human rights.

SWANI RUBBER INDUSTRIES commits to conduct on-going human rights due diligence to assess and mitigate potential human rights infringements.

SWANI RUBBER INDUSTRIES expects those with whom it does business to respect all human rights.

RESPONSIBILITY:

The Human Rights policy is owned and maintained by SWANI's Human Resources function. Human Resources is responsible for the creation, administration, updating and communication of the policy.

IMPLEMENTATION AND COMPLIANCE:

Employees and suppliers are expected to comply with this and all applicable SWANI'S policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities, where we have sound reason to believe that our business partners infringe Human Rights, we reserve the right to cease those relationships as warranted.

Specific to this policy, employees and suppliers are expected to:

- Never infringe on human rights.
- Be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners and report any situation in which a human rights infringement is suspected.

MEASUREMENT OF OUTCOMES

We have no reported human rights violation incident in near past and we have not been subjected to any legal cases or investigations involving human rights violations.

We have procedure in place for imparting trainings on human rights and related aspects. Training records are being maintained.

Labour

SWANI RUBBER INDUSTRIES has a policy in place for Human rights and Labour practices which is part of our management handbook and employee manual. We are committed to advancing fundamental human rights and responsible labor practices in our operations. We believe that each employee contributes directly to the growth and success of the company.

OBJECTIVES & GOALS

SWANI RUBBER INDUSTRIES prohibit the use of child labor and all forms of forced labor. We provide employment irrespective of gender, caste, religion, color etc.

Discrimination and harassment is not tolerated in the workplace and in any work related circumstance.

- All employment with SWANI RUBBER INDUSTRIES is voluntary. We do not use child or forced labor in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers. We fully respect all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labor worldwide.
- SWANI RUBBER INDUSTRIES abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- We respect our employees' right to choose to join or not join a trade union, or to have recognised employee representation in accordance with local law.

IMPLEMENTATION

SWANI RUBBER INDUSTRIES has policies and objectives in place which are derived from management policies and mission statements. All employees, suppliers, visitors and interested parties are communicated and convinced to adhere all the policies.

Specific to this policy, employees are expected to read, understand, and comply with all provisions of the Employees handbook which is designed to provide information about working conditions, employee benefits, and some of the policies affecting employment.

- MEASUREMENT OF OUTCOMES

Our employees are very satisfied as per outcome of employee satisfaction survey conducted.

Annual appraisals are performed every year to determine personal development and training needs of employees. We have procedure in place for imparting trainings. Training records are being maintained.

We have not been subjected to any legal cases or investigations involving employees conflicts.

ENVIRONMENT

SWANI RUBBER INDUSTRIES has a policy in place for Environment protection which is part of our management handbook and employee manual. **SWANI RUBBER INDUSTRIES** complies with all applicable environmental legislation and regulations and is certified to ISO 14001 environment standard.

We are focused to prevent all the elements of pollution through various means like managing our processes, our materials and our people in order to reduce the environmental impacts associated with our works. We tries to control emissions, spillages, wastes and save energy from our various operations and shall strive for continual improvement of our environmental management systems.

ENVIRONMENT POLICY

SWANI RUBBER INDUSTRIES recognizes that our business has an important role to play in protecting and enhancing the environment for future generations and to help secure the long-term sustainability. We at SWANI RUBBER INDUSTRIES are conscious of our social responsibilities with regards to helping the environment through our working practices. We believe that our corporate responsibility goes beyond our proprietary borders and therefore every effort will be made to conserve resources throughout our operations. SWANI RUBBER INDUSTRIES will endeavour to reduce the impact on the environment where ever possible.

Objectives & Goals

Energy Consumption

Swani Rubber Industries will use energy efficient products where ever practical, and monitor usage to achieve minimum energy consumption and reducing it by 5%

Water Consumption & Discharge

Swani rubber Industries will make every effort to use water efficiently and reduce consumption of Water by 10%.

Materials, Chemicals & Waste Management

Swani Rubber Industries will try to minimize the production of waste and pollution; including unnecessary packaging. Swani Rubber Industries will implement measures to reduce the volume of waste generated. Swani Rubber Industries will try to minimize environmental impact with regard to sourcing materials. Swani Rubber Industries will avoid using materials which have an undesirable effect on the environment.

Pollution prevention & reduction

Swani Rubber Industries encourages employee participation to incorporate methods for prevention and minimising air pollution.

Green Purchasing

To engage with our suppliers to reduce packaging by 20%

Community Social Responsibility

To continue our involvement with local charities

IMPLEMENTATION

Employees and suppliers are expected to comply with this and all applicable SWANI'S policies. To this end we are committed to taking the following action;

- To achieve sound environmental practices across our entire operation
- To comply fully with all relevant legislation
- To minimise our waste and reduce our water consumption where possible
- To reduce, Reuse, Recycle the resources consumed by our business wherever practical
- To invite our customers, suppliers and contractors to participate in our efforts to protect the environment
- To provide all employees with the training and resources required to meet our objectives and targets
- To openly communicate our policies and practices to interested parties
- To monitor and record our environmental impacts on a regular basis and compare our performance with our policies, objectives and targets”

- MEASUREMENT OF OUTCOMES

We have no reported environment violation incident in near past and we have not been subjected to any legal cases or investigations involving environment protection violations.

We have procedure in place for imparting trainings on environment protection and related aspects which helps in minimizing environment impact of our activities. Training on environment management systems are conducted and records are being maintained.

We undergo annual audits which is part of our certification program. Audits are conducted smoothly and effectively without any serious non compliance.

ANTI CORRUPTION

ANTI CORRUPTION & BRIBERY POLICY

SRI is committed to carrying out business fairly, honestly and openly. It is a violation of SRI's Anti-Bribery & Corruption Policy to offer, pay, promise or authorize to pay money, gifts or anything of value, including but not limited to bribes, entertainment, facilitation payments, kickbacks or any benefit, directly or indirectly, to any person or company whether a public official or private person or company, in order to improperly secure or retain business or to obtain, retain or secure an improper advantage in the conduct of business for SRI or for any SRI employee, contractor other agent of SRI to solicit or accept any such payment or other benefit in connection with the performance of any service or other activity on behalf of SRI. Suppliers in all commercial dealings with SWANI or otherwise must not receive or offer to make any illegal payments, gifts, bribes, donations or other improper advantage in order to obtain unethical favours for the business.

IMPLEMENTATION

All employees, suppliers and interested parties are expected to comply with this and all applicable SWANI'S policies

At a minimum, all third parties wanting to establish a relationship with SRI must complete, sign and return due diligence form and certification to SRI.

All suppliers must ensure that no action is taken to violate any applicable anti-bribery or anti-corruption laws and regulations in the locations of their operations and make every effort to eliminate all forms of corruption and bribery.

A whistleblower procedure is established to identify and report any such incident and necessary action will be taken accordingly.

- MEASUREMENT OF OUTCOMES

We have no reported incident in near past related to corruption and bribery.

We have procedure in place for imparting trainings. Training on anti corruption and bribery is conducted and records are being maintained.