



RAVIRAJ FOILS LIMITED. EHS PROCEDURE

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TITLE: Code of Conduct	DOC. NO.	RFL/EHS/PR/42
	REV. NO.	00
	EFFECTIVE DATE	20/08/2024
	REVIEW DATE	19/08/2025
	SUPERSEDES	NIL

1. Purpose

The purpose of this Code of Conduct is to establish the fundamental principles and standards that guide the behavior and decision-making of all employees, directors, officers, and stakeholders of Raviraj Foils Ltd. This Code ensures compliance with applicable laws and regulations, promotes ethical conduct, and upholds the values of the company in line with the Global Reporting Initiative (GRI) standards and the Aluminium Stewardship Initiative (ASI) requirements.

2. Scope

This Code of Conduct applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders involved with Raviraj Foils Ltd. It covers all business operations, including manufacturing, supply chain, and customer relations.

3. Core Values

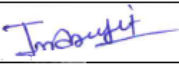
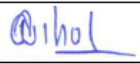
Integrity: We act with honesty, fairness, and transparency in all our dealings.

Respect: We treat all individuals with dignity and respect, valuing diversity and inclusion.

Accountability: We take responsibility for our actions and their impact on stakeholders and the environment.

Sustainability: We are committed to sustainable practices that minimize our environmental impact and contribute to the well-being of our communities.

4. Ethical Business Conduct

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Compliance with Laws and Regulations: All employees must comply with applicable laws, regulations, and company policies. This includes adherence to labor laws, environmental regulations, and corporate governance standards.

Anti-Corruption and Bribery: Raviraj Foils Ltd. has a zero-tolerance policy towards corruption and bribery. Employees must not engage in any form of corrupt practices, including offering or accepting bribes, kickbacks, or other illicit payments.

Fair Competition: We are committed to fair competition and do not engage in anti-competitive practices such as price-fixing, market allocation, or abuse of market dominance.

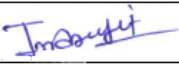
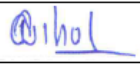
Conflict of Interest: Employees must avoid conflicts of interest that could compromise their ability to make impartial decisions. Any potential conflicts must be disclosed to management.

Transparency and Disclosure: We are committed to transparency in our business operations and financial reporting. All disclosures must be accurate, complete, and timely, in accordance with GRI standards and other applicable regulations.

5. Human Rights and Labor Practices

Respect for Human Rights: We respect and support internationally recognized human rights as set out in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

Gender Equity and Women's Empowerment: We are committed to promoting gender equity and empowering women in the workplace. This includes ensuring equal opportunities, supporting women's career development, and addressing gender-specific challenges.

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Minority and Indigenous Communities: We recognize and respect the rights of minority and indigenous communities. Our operations are conducted in a manner that supports the inclusion and well-being of these communities.

Free, Prior, and Informed Consent (FPIC): We uphold the principle of FPIC for indigenous and local communities affected by our operations. We engage in meaningful consultations and ensure that their consent is obtained before proceeding with activities that impact their lands and resources.

Equal Opportunity and Non-Discrimination: Raviraj Foils Ltd. provides equal employment opportunities to all employees and applicants, regardless of race, color, religion, gender, sexual orientation, age, disability, or any other protected characteristic.

Health and Safety: We are committed to providing a safe and healthy work environment for all employees. This includes adherence to occupational health and safety regulations and continuous improvement of safety practices.

Child Labor and Forced Labor: We do not engage in or tolerate the use of child labor or forced labor in any form. We ensure compliance with all relevant laws and international standards regarding labor practices.

Freedom of Association and Collective Bargaining: We respect the rights of employees to freely associate and engage in collective bargaining in accordance with applicable laws.

6. Environmental Responsibility

Sustainable Resource Management: We are committed to the responsible use of natural resources and minimizing our environmental impact through energy efficiency, waste reduction, and water conservation.

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Safety Officer

Sr. EHS Officer

HR - Head

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Water Stewardship: We recognize the importance of water as a critical resource and are committed to sustainable water management practices. This includes reducing water consumption, improving water use efficiency, and protecting water quality in our operations and surrounding communities.

Pollution Prevention and Control: We adhere to all applicable environmental laws and regulations, including those related to air, water, and soil pollution. We implement best practices to prevent and control pollution across our operations.

Biodiversity and Ecosystem Protection: We recognize the importance of protecting biodiversity and ecosystems. Our operations are conducted in a manner that minimizes the impact on the environment and promotes ecological sustainability.

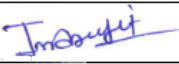
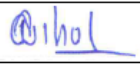
Climate Change Mitigation: We are committed to reducing our greenhouse gas emissions and supporting initiatives that contribute to climate change mitigation.

Responsible Sourcing: We are committed to sourcing raw materials in a responsible manner, in line with ASI Performance Standards. This includes ensuring that our suppliers comply with ethical, environmental, and social standards.

Chain of Custody: We maintain a traceable chain of custody for our products, ensuring that aluminum produced by Raviraj Foils Ltd. meets ASI certification requirements.

Product Stewardship: We ensure that our products meet the highest standards of quality and safety. This includes compliance with all relevant regulations and standards for aluminum production and packaging.

7. Stakeholder Engagement

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Community Engagement: We engage with local communities to understand their concerns and contribute to their development. This includes supporting local initiatives and ensuring that our operations do not negatively impact the communities in which we operate.

Supplier and Contractor Relations: We expect our suppliers and contractors to adhere to the same high standards of ethical conduct, human rights, and environmental responsibility that we uphold. We conduct regular assessments and audits to ensure compliance.

Transparent Communication: We maintain open and transparent communication with all stakeholders, including employees, customers, suppliers, investors, and the public. We provide accurate and timely information about our operations and performance.

8. Compliance and Reporting

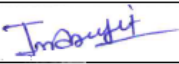
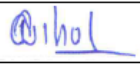
Monitoring and Compliance: The compliance team is responsible for monitoring adherence to this Code of Conduct. Regular audits and assessments are conducted to ensure compliance with the Code.

Reporting Violations: Employees and stakeholders are encouraged to report any violations of this Code of Conduct. Reports can be made anonymously, and there will be no retaliation against anyone who reports a violation in good faith.

Disciplinary Actions: Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or business relationships.

9. Training and Awareness

Employee Training: All employees will receive regular training on the Code of Conduct, including specific training related to GRI and ASI standards. This ensures

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that everyone understands their responsibilities and the importance of ethical conduct.

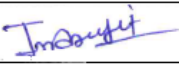
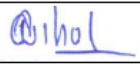
Ongoing Awareness: We will provide ongoing communication and updates to all employees and stakeholders about changes to the Code of Conduct and relevant compliance requirements.

10. Review and Revision

Regular Review: This Code of Conduct will be reviewed annually or as needed to ensure it remains relevant and effective in addressing the company's ethical and compliance obligations.

Revision History: Any changes or updates to this Code will be documented in the revision history, and all stakeholders will be informed of the changes.

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

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