



CODE OF CONDUCT



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FOR WILH. LOESCH INDIA PVT. LTD AND ITS GROUP COMPANIES (TOGETHER REFERRED AS “WILH. LOESCH GROUP”)

OUR CORE VALUES

WE BELIEVE IN HUMAN, SOCIAL, ECONOMIC AND ENVIRONMENTAL SUSTAINABILITY.

- THRIVE EXCELLENCE
- RESPECT FOR DIVERSITY
- WORK IN COOPERATION
- HONESTY IS THE BEST POLICY
- ENFORCE SAFETY

THIS DOCUMENT INTRODUCES WILH. LOESCH GROUP'S GENERAL BUSINESS PRINCIPLES.

INTEGRITY HAS BEEN AND WILL BE THE KEY IN ESTABLISHING AND MAINTAINING OUR REPUTATION AND PROVIDING OUR QUALITY SERVICES.

TO OUR CUSTOMERS. WE DEEM OUR REPUTATION AN ASSET JUST LIKE OUR EMPLOYEES.

OUR OBJECTIVE IS TO PRESERVE CONTINUITY OF THE COMPANY BY MAINTAINING A STRONG FINANCIAL FOUNDATION AND REMAINING A PROFITABLE BUSINESS. THIS IMPLIES INVESTING FOR LASTING GROWTH AND TO WEIGH UP SHORT AND LONGTERM INTERESTS, WITH DUE CARE AND RESPECT FOR OUR CUSTOMERS, EMPLOYEES, SHAREHOLDERS, SUPPLIERS AS WELL AS THE ENVIRONMENT.

WE HAVE PULLED TOGETHER IN THIS CODE OF CONDUCT A SET OF POLICIES AND GUIDELINES, WHICH WE HOPE PROVIDES TO ALL WILH. LOESCH GROUP'S EMPLOYEES, SUPPLIERS AS WELL AS CUSTOMERS, AN UNDERSTANDABLE FRAMEWORK THAT THEY CAN ADHERE TO IN CARRYING OUT THEIR RESPECTIVE RESPONSIBILITIES.



INTEGRITY

WILH. LOESCH GROUP CONDUCTS ITS BUSINESS WITH INTEGRITY, HONESTY AND FAIRNESS, WITH DUE RESPECT FOR THE INTERESTS OF THOSE WITH WHOM IT IS DOING BUSINESS AND FOR THE COMMUNITY AT LARGE. INTEGRITY IS ESSENTIAL TO WILH. LOESCH GROUP BUSINESS AND IS NOT IN ANY CIRCUMSTANCES TO BE SACRIFICED FOR THE SAKE OF RESULTS.

WILH. LOESCH GROUP SHALL ENSURE THE INTEGRITY OF PERSONAL DATA OR INFORMATION PROVIDED BY THEM TO OUR COMPANY & SAFEGUARD THE PRIVACY OF ALL SUCH DATA OR INFORMATION GIVEN TO US IN ACCORDANCE WITH APPLICABLE COMPANY POLICIES OR LAW.

WILH. LOESCH GROUP SHALL SAFEGUARD THE CONFIDENTIALITY OF ALL THIRD PARTY INTELLECTUAL PROPERTY AND DATA & SHALL NOT MISUSE SUCH INTELLECTUAL PROPERTY AND DATA THAT COMES INTO THEIR POSSESSION. WILH. LOESCH GROUP SHALL PROMPTLY REPORT THE LOSS, THEFT OR DESTRUCTION OF ANY CONFIDENTIAL INFORMATION OR INTELLECTUAL PROPERTY AND DATA OF OUR COMPANY OR THAT OF ANY THIRD PARTY.

LEGAL COMPLIANCE

THE WILH. LOESCH GROUP COMPLY WITH LAWS AND REGULATIONS OF THE COUNTRIES IN WHICH THEY OPERATE. THESE LAWS AND REGULATIONS ARE NUMEROUS AND OFTEN COMPLEX. WHENEVER ANY QUESTION ARISES, EMPLOYEES SHOULD SEEK GUIDANCE ON THESE REQUIREMENTS FROM THEIR SUPERIOR OR THE COMPANY'S LEGAL COUNSEL.

EMPLOYEES

WILH. LOESCH GROUP RECRUIT, EMPLOY AND PROMOTE EMPLOYEES ON THE SOLE BASIS OF THE QUALIFICATIONS AND ABILITIES (INCLUDING REPUTATION AND RELIABILITY). WILH. LOESCH GROUP ENDEAVORS TO ENABLE EACH INDIVIDUAL TO DEVELOP ITS TALENTS IN VARIOUS WAYS (INCLUDING TRAINING PROGRAMS).

WILH. LOESCH GROUP CONSIDERS SAFE AND HEALTHY WORKING CONDITIONS FOR ITS EMPLOYEES TO BE FUNDAMENTAL.

WILH. LOESCH GROUP BELIEVES THAT GOOD COMMUNICATION WITH EMPLOYEES IS ESSENTIAL.

HEALTH, SAFETY AND ENVIRONMENT

WILH. LOESCH GROUP IS COMMITTED TO CONDUCT IT'S OPERATIONS IN AN ENVIRONMENTALLY SOUND AND SUSTAINABLE MANNER.

PROHIBITED DRUGS AND SUBSTANCES

USE OF PROHIBITED DRUGS AND SUBSTANCES CREATES GENUINE SAFETY AND OTHER RISKS AT OUR WORKPLACES. WILH. LOESCH GROUP DO NOT TOLERATE PROHIBITED DRUGS AND SUBSTANCES FROM BEING POSSESSED, CONSUMED OR DISTRIBUTED AT OUR WORKPLACES, OR IN THE COURSE OF COMPANY DUTIES.



CUSTOMERS AND VENDORS

BRIBES

IN DEALING WITH CUSTOMERS AND VENDORS, WHICH MAY INCLUDE GOVERNMENTAL BODIES, WILH. LOESCH GROUP EXPECTS ITS MANAGERS AND EMPLOYEES NEITHER TO GIVE NOR TO RECEIVE BRIBES OR ANYTHING OF VALUE IN ORDER TO RETAIN OR BESTOW BUSINESS OR FINANCIAL ADVANTAGES. WILH. LOESCH GROUP ARE DIRECTED THAT ANY DEMAND FOR AN OFFER OF SUCH BRIBE OR ANYTHING OF VALUE MUST BE IMMEDIATELY REJECTED.

BUSINESS ENTERTAINMENTS

ACCEPTING AND PROVIDING REASONABLE BUSINESS ENTERTAINMENTS IN THE COURSE OF THE COMPANY'S BUSINESS IS ACCEPTABLE.

GIFTS

THE GIVING OF SMALL BUSINESS GIFTS TO INDIVIDUALS SHOULD BE DECIDED ON IN CONSULTATION WITH THE SUPERIOR OF THE DONATING EMPLOYEE ON THE BASIS OF LOCAL BUSINESS PRACTICE AND REGULATIONS.

AN EMPLOYEE MUST DECLARE TO HIS OR HER IMMEDIATE SUPERIORS, DETAILS OF ANY GIFTS RECEIVED FROM CUSTOMERS, SUPPLIERS OR ANY OTHER EXTERNAL PARTY, AND SHALL NOT RETAIN SUCH GIFTS WITHOUT THE CONSENT OF HIS OR HER SUPERIOR.

PAYMENTS TO AGENTS/ INTERMEDIARIES

COMMISSION PAYMENTS TO BE MADE TO AGENTS OR OTHER INTERMEDIARIES IN CONNECTION WITH THE AWARDING OF CONTACTS BY CUSTOMERS SHOULD BE MEASURED AGAINST THE SERVICES PERFORMED IN RETURN AND SHOULD BE CLEARED IN ADVANCE WITH THE MEMBER OF THE EXECUTIVE BOARD HAVING PRIME RESPONSIBILITY FOR THE ACTIVITY.

QUALIFICATIONS (SUB) CONTRACTORS

WILH. LOESCH GROUP IS REQUIRED TO RETAIN (SUB) CONTRACTORS ON THE BASIS OF THE QUALIFICATIONS AND ABILITIES NEEDED FOR THE WORK TO BE PERFORMED INCLUDING THEIR REPUTATION AND TO SEE TO IT THAT THESE CONTRACTORS APPLY THE SAME ETHICAL BUSINESS PRINCIPLES AS APPLIED BY. WILH. LOESCH GROUP

CONFLICTS OF INTERESTS

WILH. LOESCH GROUP SHALL AVOID PERSONAL ACTIVITIES AND FINANCIAL INTERESTS, WHICH MIGHT BE ADVERSE TO THE INTERESTS OF WILH. LOESCH GROUP, PRODUCES CONFLICTING LOYALTIES OR INTERESTS OR INTERFERE WITH EFFECTIVE JOB PERFORMANCE OR WHICH INVOLVE THE APPEARANCE OF A CONFLICT OF INTEREST.



WILH. LOESCH GROUP ACCEPTS THE CONCEPT OF ITS EMPLOYEES TO HAVE PRIVATE FINANCIAL AND/OR BUSINESS INTERESTS OUTSIDE THEIR PROFESSIONAL ACTIVITIES WITH WILH. LOESCH GROUP. HOWEVER TO THE EXTENT THESE INTERESTS MAY HAVE AN INTERFACE WITH ACTIVITIES OF WILH. LOESCH GROUP, IT INVITES THEM TO REPORT SUCH INTERESTS TO THEIR SUPERIORS OR THE PERSON DESIGNATED BY THE EXECUTIVE BOARD TO KEEP A RECORD THERE OF.

REPORTING

WILH. LOESCH GROUP ACCOUNTING AND OPERATIONAL RECORDS AND SUPPORTING DOCUMENTS MUST ACCURATELY DESCRIBE AND REFLECT THE NATURE OF THE TRANSACTIONS AND SHALL BE SUBJECT TO AUDIT. UN DISCLOSED OR UNRECORDED ACCOUNTS, FUNDS OR ASSETS WILL NOT BE MAINTAINED OR ESTABLISHED.

PUBLIC ACTIVITIES

WILH. LOESCH GROUP DOES NOT PARTICIPATE IN PARTY POLITICS NOR MAKE PAYMENTS TO POLITICAL PARTIES OR TO THE FUNDS OF GROUPS WHOSE ACTIVITIES ARE DIRECTED AT PROMOTING PARTY INTERESTS.

WHEN DEALING WITH GOVERNMENTS OR GOVERNMENTAL AGENCIES, WILH. LOESCH GROUP ARE ENCOURAGED TO PROMOTE AND DEFEND THEIR LEGITIMATE COMMERCIAL OBJECTIVES. THEY MAY DO SO DIRECTLY OR THROUGH BODIES SUCH AS TRADE ASSOCIATIONS.

WILH. LOESCH GROUP IS ENCOURAGED TO RESPOND TO REQUESTS FROM GOVERNMENTS AND OTHER AGENCIES FOR INFORMATION, OBSERVATIONS OR OPINIONS ON ISSUES RELEVANT TO THEIR BUSINESS AND TO PARTICIPATE IN THE DEVELOPMENT OF PROPOSED LEGISLATION OR REGULATIONS IN AREAS WHICH MAY HAVE AN EFFECT ON THEIR LEGITIMATE INTERESTS.

THE ENVIRONMENT

WILH. LOESCH GROUP STRIVES FOR ENVIRONMENTAL SUSTAINABILITY & GREEN INDUSTRIALIZATION AND COMPLY WITH ALL APPLICABLE LAWS AND REGULATIONS. WE SEEK TO PREVENT THE WASTEFUL USE OF NATURAL RESOURCES AND ARE COMMITTED TO IMPROVING THE ENVIRONMENT, PARTICULARLY WITH REGARD TO THE EMISSION OF GREENHOUSE GASES, CONSUMPTION OF WATER AND ENERGY, AND THE MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS. WE SHALL ENDEAVOR TO OFFSET THE EFFECT OF CLIMATE CHANGE IN OUR ACTIVITIES.





WILH. LOESCH INDIA PVT.LTD.

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