

SUPPLIER CODE OF ETHICS

MERIDIAN INFOTECH LIMITED

Version 1.0

June 2023

SUPPLIER CODE OF ETHICS

At **MERIDIAN INFOTECH LIMITED**, we value ethical business practices, transparency, and integrity in all our operations. This Supplier Code of Conduct outlines our expectations for vendors and subcontractors who provide goods and services to our company. This code reflects our commitment to Anti-Bribery, Anti-Corruption (ABAC) policies, ethical standards, and legal compliance.

1. The Suppliers shall maintain business integrity by:

- conducting their business activities in compliance with all applicable laws and regulations including laws related to human rights such as child labour and forced labour laws;
- not engaging in any corrupt practices such as offering or accepting bribes, kickbacks or improper payments of any kind to/from any Government Official or the Company employees/retainers /contractors (Company staff) for the purpose of obtaining or retaining business or gaining any improper advantage. Further the Supplier shall read, acknowledge and adhere to the Company Anti-bribery and Corruption Policy and not violate or cause its business partners to violate any applicable anti-bribery laws and regulation;
- adhering to the Company Gifts and Hospitality Policy while exchanging gifts or gratuities in cash, kind or gift cards including festive gifting and not making facilitation payment to any recipient especially for the purpose of expediting or facilitating the performance of a Government Official;
- not offering or sponsoring social entertainment for the Company staff. The Company encourages all business discussions to be generally held inside the office premises, during office hours with a prior appointment;
- providing samples of goods and services (other than the ones covered under schemes) only for purposes of evaluation and quantity provided should thus match the purpose;
- sponsoring the Company staff travel, educational conference and seminars only for valid business purposes that benefit the Company. All Supplier sponsorships should be channelled through Procurement Head at the Head Office and all payments on this account should be routed through banking channel;
- not advertising or making public announcement about the products or services of the Company unless a prior written approval of the Company's Compliance Officer is obtained; and
- maintaining and making available records related to business transaction with the Company as per applicable law and contract requirements.

Meridian Infotech Limited

Digital Transformation and ICT Infrastructure Integrator


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2. The Supplier shall respect Company's confidentiality by:

- following the applicable data privacy laws and remaining duty-bound to ensure protection of any information acquired in their business relationship with the Company;
- strictly abstaining from making any video and/or audio recording during any discussions or site show rounds, without obtaining prior consents;
- not sharing any confidential information without written consent from Procurement Head. Illustrative list of confidential information is per below:

- Cost or Pricing or Volume Information,
- Customers' data and information,
- Company staff information,
- Information on operating systems & technology platforms,
- Intellectual property,
- Organization design or plans (operational as well as financial), etc.

3. The Supplier shall disclose all potential sources of conflict of interest

A conflict of interest exists when a Supplier's direct or indirect personal interests are inconsistent with or interfere with the best interests of Company. To avoid such conflicts:

- the Supplier shall disclose any direct or indirect personal interests held by a trustee, officer or Company staff in Supplier's enterprise, and
- the Supplier shall disclose family relationship between a trustee, officer or Company staff and any director, officer or staff of the Supplier.

Further the Supplier shall not take advantage of any family/ social/ political affiliations to obtain favourable treatment or business opportunities and disclose such affiliations before entering into such business transaction.

4. The Supplier shall always engage in fair trade practices & processes by:

- not taking any advantage of social/political connections or any other undue influence for favorable treatment in business transactions;
- not engaging in cartelization and any other anti-competitive activities;
- ensuring proper quality assurance of the products and/or services sold/rendered; and
- acting only on written Purchase Order (PO) from the Company and seek clarification from Procurement Department on orders that deviate from such practice.

5. The Supplier shall report any breach of any of the provisions of this code or any unethical business practice by :

- Escalating misconduct, unethical or dishonest behaviour by any of the Company staff or associate by writing to Compliance Officer of the Company at:
 - E-mail: ethics@meridian.co.in
 - Letter to the Compliance Officer, At Meridian Registered office endorsed as '*Confidential*'.
- Endeavouring to develop mechanisms to expose wrong practices being followed by the Company staff/business associates in business dealings. The Company will ensure that such matters shall be handled in a fair and equitable manner,

- encouraging and providing such mechanism to its employees to report unethical or unlawful practices, and
- Co-operating with the Company Management in the investigation of reported allegations of fraud, unethical practices or non-compliance to law and regulation involving the Supplier or its employees and take corrective action where appropriate.

6. The Supplier has the responsibility to share this Code of Ethics with all its employees who may be engaged in conducting business activities with the Company or its subsidiaries and affiliates.

7. Consequence of violation of Supplier's Code of Conduct by the Suppliers

The Company shall deal with all infractions with fairness and impartiality. However, established failure to comply with the Company Supplier Code of Ethics by any Supplier shall lead to suspension of any contract awarded to the Supplier and blacklisting of such Supplier. Further any payments due to such Supplier as per the Company's books shall be released only after thorough investigation by the Compliance Officer who shall share the results with the Managing Director who will then take the appropriate disciplinary actions.

In the event, any employee, associate, consultant, contractor etc. is involved in or party to any violation of Supplier Code of Ethics, a disciplinary action, that may include suspension, termination, claim for reimbursement to the Company for any losses or damages resulting from such violation, shall be taken in conjunction with Human Resource department.

Disciplinary action shall also be taken against the manager or the supervisor where such violation reflects inadequate supervision or lack of diligence regarding a violation of Supplier Code of Ethics.

8. All Purchase Orders and request for proposals shall be subject to this Supplier Code of Conduct and should draw reference to the Company Supplier Code of Ethics and Supply Chain/Procurement is expected to widely share the contents of the Code with all the existing and potential Suppliers.

9. The Supplier shall provide a declaration along with all relevant disclosures in the prescribed format (see format A and B) and on a periodicity determined by the Company from time to time.

This Document (Vers. 1) is effective from 12th June 2023.