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Ethical Code

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Reviewed by: Mr.O.K. Kaul, CEO

This document will be reviewed on a yearly basis.

Introduction

Avanti Prara is a leather manufacturer working with ovine skins and buffalo, inspired by a sustainable and ethical production. This Code of Ethics should collect values and principles that are actively practiced at Avanti Prara. The rules of conduct everyone is required to follow can be found within this document and are shared with all stakeholders (shareholders, employees, management and external partners). For Avanti Prara, the Ethical Code is the basis of a proper functioning, reliable and successful company of good reputation.

All activities within Avanti Prara are working according to Chapter-III to Chapter-XI of The Factories Act, 1948.

Scope and Recipients

This Code of Ethics is addressed to all stakeholders of the company such as management, employees, external collaborators, consultants, agents, attorneys, or any other person acting on behalf of Avanti Prara.

The scope of this document is considered according to all countries Avanti Prara is operating in and based on essential principles such as fairness, transparency and ethical integrity.

In order to comply with those principles, Avanti Prara has created a series of principles and control systems. Constantly verifying the degree of compliance within the company is of utmost importance.

Avanti Prara, in particular the management, continuously amends the principles, objectives and scopes in order to assure that they are always on the latest stage.

This Ethical Code should not only give a picture of Avanti Prara as a business, but further concretely communicate the strong cohesion and spirit of the company's mantra.

Avanti Prara excludes any kind of illegitimate favors, collusive practices, corruption and/or solicitation of personal advantages.

Ethical Principles

The following principles have been identified in order to ensure value creation for all recipients. Every department of Avanti Prara is connected and inspired by the Ethical Code to have a consistent internal strategy.

- · Avanti Prara complies in all countries of operation with laws and regulations in force;
- · Transparency, rightfulness, legitimacy and openness are core values fo the company;
- · Discretion will be honored;
- · Human Resources are treated with respect and dignity at all times;
- Respect for competition and fair behavior in the economic system are indispensable;
- · There is no space for corruption or bribery of any kind;
- The environment and its protection are a priority at Avanti Prara and their safeguarding implemented in all actions and decisions;

Application of Ethical Principles

Obligations of the Recipients:

Management is required to communicate the ethical principles and values. It has to refrain from any activity that could be perceived, in any way, as a conflict of interest to the company. If necessary, any issues have to be communicated to Supervisory Bodies of the company.

Every employee needs to agree to the ethical principles and work according to them. Further, they contribute to the achievements of the corporate purpose in a professional way showing loyalty, honesty and good faith. Team spirit and fairness are core values expected from every stakeholder of the company. The relationship between employees should show that collaboration and mutual respect are always present.

The same is expected during every action, operation, negotiation and similar with third parties/collaborators.

Employees and collaborators should at any time be aware of: ..

- internal procedures regarding leave, holidays, expense reimbursement and adequate documentation processes;
- the company provisions regarding security and dissemination of sensitive information;
- the rules regarding use of company assets (diligence, purpose related)
- rules regarding data and information use (prohibition of manipulation)
- · not using the company name/reputation for personal advantage
- Introducing this Code of Ethics with third parties who come into contact with the company;

Value of the person and human resources

A more exhaustive description of this topic can be found in our Social Policy, dedicated to our human resources.

Avanti Prara stands for fair, respectful and ethical working conditions where the value of the people is of utmost importance. All employees are protected from any kind of discrimination or physical harm and cultural as well as moral integrity are ensured at any time. No one will be discriminated on grounds of nationality, race, gender, caste, ethnicity, religious belief, political memberships, language, age, and/or sexuality according to SDG 10 defined by the UN. A tight collaboration and information exchange/reporting is necessary.

At the time of recruiting, we check whether the incumbent is of employable age as per the Child Labor Act (ILO Convention 138) and doesn't recruit if he/she is considered as Child as per Law. We don't have any compulsory labor conditions and don't compel anyone to perform compulsory labor of any nature. The facility keeps record of all personnel and their age through copy of an identity card or similar. Work is distributed according to the age and capabilities of the personnel to ensure their health and safety at any time.

Skills and competences of each employee shall be respected and nurtured. In that way, we foster innovation and a healthy working environment. Management and employees are encouraged to grow within their own set expectations and in respect of their limits. Responsibilities are assigned according to performance and level of dedication. However, any kind of personal growth shall be encouraged and supported.

Employee Code:

- · Avanti Prara guarantees safe and respectful working conditions;
- Selection and evaluation of personnel on basis of professional profile and performance in compliance with equal opportunities of all candidates;
- All information regarding work times, holidays, legal rights, responsibilities, contract and policies have to be communicated to all employees;
- Management needs to ensure proper training and development opportunities for all employees to support personal and professional growth;
- · The company objectives and targets have to be communicated openly with the team;
- · The financial compensation has to be according to Law;
- Employees can communicate with Management either directly or through selected Representatives;

Privacy

Avanti Prara protects personal data and avoids improper or even illegal use. Policies and procedures are constantly updated to ensure protection of information. Every stakeholder involved needs to ensure utmost confidentiality and privacy, even outside the working hours. This includes, but not only, customer information, internal financial, legal, administrative, technical information, or commercial know-how. Only necessary data to carry out business will be processed and only for the active period of collaboration. The information collected will be inaccessible to unauthorized parties.

Relations with third parties

As stated above, Avanti Prara ensures highest principles of loyalty and correctness towards third parties.

As a matter of policy, Avanti doesn't encourage or indulge in bribery, corruption, favoritism etc. at any level. Any violation of this policy constitutes a breach of the obligations of the working/employment relationship in accordance with applicable local legislations.

Avanti Leathers maintains at any time a loyal and correct relationship towards external parties, not tolerating corruption, collusive conduct, or favoritism. It is forbidden for personnel or collaborators to give/offer and accept/receive immoral gifts, benefits and/or other utility, personal or otherwise connected to the company's activity. Normal courtesy relations or commercial practices are not included.

Relations with the public administration have to be transparent and correct, and shall at no time transfer any ambiguous or misleading messages. Only official relations to obtain necessary authorizations for the company's activity shall be held and shall not include any improper offerings of money or other benefits. The company shall not make contributions of any kind or allocate funds to support public entities belonging to the public administration, excerpt those permitted by Law and only if regularly approved and transparently documented.

External Communication

Avanti Prara leaves any external communication to the dedicated communication team or external professionals. It is prohibited to disclose any confidential information acquired in the carrying out company activities or false information of any kind. To ensure consistency and completeness of communication, functions in charge have to confirm publication.

Any kind of violation / non-compliance of this Code of Ethics will be followed by consequences appropriate to the violation. This includes prosecution by the judicial authority.