

Ascendant Training and Consulting Solutions LLP (hereby referred to as AscendantTM) mission is to create value for all stakeholders. AscendantTM is committed to the responsible sourcing and this policy sets out its expectations of those who provide these goods and services to AscendantTM.

The term 'Supplier' as used in this policy refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do or seek to do business with AscendantTM.

This policy briefs the minimum standards we expect and we encourage all suppliers to go beyond these requirements. In addition to meeting this policy, the supplier shall comply with all national laws and regulations, as well as other applicable industry. Where there are differences between the terms of this policy and national laws or other applicable standards, the supplier shall always adhere to the higher or more stringent requirements.

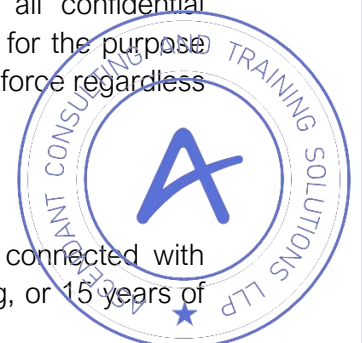
It is the supplier's responsibility to ensure that this policy is communicated to all employees and sub-suppliers as an integrated part of the supplier's regulations and management policies.

BUSINESS ETHICS

- ✦ In keeping with our commitment to exercising appropriate standards of professionalism and ethical conduct in all business activities, AscendantTM will not tolerate bribery or corruption in any form or any breach of its Zero Tolerance Policy.
- ✦ Suppliers and business partners are not permitted to directly or indirectly promise, offer or provide any improper advantage to any person or entity, including officials of a government or a government-controlled entity. AscendantTM employees are not allowed to accept any such advantage and we expect the same approach in business dealings from our business partners, suppliers and third parties.
- ✦ Suppliers are expected to maintain accurate records of their activities and performance that demonstrate compliance with all applicable standards, regulations and requirements.
- ✦ Suppliers must disclose any personal relationships, economic interest or other ties to their business held by an employee or contractor with AscendantTM.
- ✦ Suppliers shall provide AscendantTM with high-quality goods and services that meet all applicable quality and safety standards, and demonstrate that they have robust management systems in place. We expect suppliers to immediately report to AscendantTM any concerns about product quality and safety.
- ✦ Suppliers shall take appropriate measures to secure and protect all confidential information related to its relationship with AscendantTM and use it only for the purpose authorised under contractual agreement. This obligation shall remain in force regardless of the status of the business relationship.

HUMAN RIGHTS

- ✦ Suppliers shall not permit child labour to be used in any operation connected with AscendantTM. No child below the age for finishing compulsory schooling, or 15 years of



age (whichever is the greater) may be employed by a supplier, subject to national/international law exceptions.

- ✦ Where young people under the age of 18 are employed, suppliers will ensure that their work is not likely to be harmful to their health and/or development, including no working under hazardous conditions and ensuring compliance with all applicable laws.
- ✦ Suppliers must ensure that all employees have the legal right to work and any migrant workers should have a valid work permit issued by the relevant authority.
- ✦ Employees handing in government-issued identification; passports or work permits may be normal business practice and acceptable under certain circumstances. However, suppliers shall not force employees to hand over government-issued identification.
- ✦ Suppliers shall not permit the use of forced or involuntary labour of any type (i.e. forced, trafficked, bonded, indentured or involuntary prison labour) and workers shall be free to leave employment without penalty on the provision of reasonable notice.
- ✦ The use of physical abuse, verbal or sexual harassment or intimidation of workers shall be prohibited by suppliers.
- ✦ Suppliers shall respect the rights of employees to join or refrain from joining worker organisations and will allow workplace access for such organisations to facilitate their representative functions.
- ✦ Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.
- ✦ Suppliers shall ensure that their employees are fairly compensated and that, at a minimum, they comply with all applicable wage and hour laws, or industry standards approved based on collective bargaining, whichever is higher. Deductions to wages shall only be made in accordance with applicable law or under collective agreement.
- ✦ Suppliers must provide for working hours that comply with national laws and industry standards. Total worked hours shall not exceed the maximum allowable under local legislation.
- ✦ All overtime shall be voluntary and compensated in accordance with applicable laws.
- ✦ Suppliers shall not seek to avoid obligations to workers under labour or social security laws and regulations arising from the regular employment relationship through the excessive use of fixed-term contracts, labour-only contracting, subcontracting, home-working or apprenticeship schemes.

OCCUPATIONAL HEALTH AND SAFETY

- ✦ Supplier facilities must be constructed and maintained in accordance with applicable laws and regulations, where provided at a minimum, reasonable access to potable water and sanitary facilities; fire safety; emergency preparedness and response; industrial hygiene; adequate lighting and ventilation; occupational injury and illness and machine safeguarding. Suppliers will also ensure these same standards apply to any dormitory or canteen facilities.



- ✦ Suppliers shall ensure all employees work within safe and humane conditions, including providing adequate training and effective protective equipment to safely carry out their duties. Suppliers shall comply with all the applicable health and safety-related laws and regulations. Workers shall never be disciplined for raising safety concerns and for refusing to work in an unsafe environment. Clear procedures shall be in place to identify, manage, control, record and report occupational hazards, risks, injuries and illnesses appropriately. Furthermore, Suppliers shall implement corrective actions to eliminate the root causes of injuries and illnesses.
- ✦ Suppliers shall ensure that employees are free to raise, without prejudice, welfare or mental health issues and take appropriate action to address such concerns. Where hazardous substances are used, relevant supervision, datasheets, controls and emergency plans shall be provided. Suppliers shall ensure there are adequate washing facilities for all their employees, especially at locations where acids or other corrosive substances are handled. All electrical equipment and wires shall be safely insulated, equipped with safety fuses and regularly inspected and repaired.

ENVIRONMENT

- ✦ Suppliers shall carry out their operations with care for the environment and at a minimum prioritize the aspects of environmental impact such as; exploitation of natural resources, energy, freshwater, emissions to air and water, noise and dust, risks to cause soil pollution, waste disposal and product-related aspects such as design, packaging and transportation. In particular, suppliers should seek to optimise their use of natural resources and minimise the generation of waste.
- ✦ AscendantTM expects suppliers to support its sustainability commitments through the adoption of good operating practices. We encourage our suppliers to have a documented Environmental Management System (EMS) in place to manage the organization's procedures and production processes in a comprehensive and documented manner, specifically adhering to environmental regulations.
- ✦ Suppliers shall comply with all national laws and regulations prohibiting or restricting specific substances and continuously maintain records of relevant raw material declarations such as Material Data Sheets (MDS) or Safety Data Sheet (SDS) or similar. In terms of documentation, suppliers must have appropriate management systems and routines in place to monitor:
 - The handling of any chemicals in its operations in an environmentally safe way;
 - The handling of any Conflict minerals shall follow international rules to implement reporting and disclosure requirements regarding conflict minerals.
 - The handling, storing, and disposing of hazardous waste in an environmentally safe manner.
 - Routines to avoid pollution.
 - Emergency routines to prevent and minimize the effects on health and environment in the event of an emergency or an accident.
 - How development and diffusion of environmentally friendly technologies and/or materials are addressed and encouraged where applicable.



This policy is reviewed by Ascendant™ management at intervals for its continuing suitability. Any changes in the policy shall be communicated to suppliers at the earliest interval for their awareness, acceptance and application.

Latest Review 02-June-2020



Deepti Thareja

Deepti Thareja
Chief Executive Officer