



An ISO 9001, ISO 14001 and OHSAS 18001 certified company.
Marvel Infrabuild Pvt. Ltd. #76, Pembroke Layout, Panathur, Varthur Hobli, Bangalore-560043.

SUPPLIER CODE OF CONDUCT

At Marvel we are committed to the highest standards of product quality and business integrity in our dealings with our suppliers. To achieve this, we have drawn up a Code of Conduct. We actively encourage our suppliers to abide by this Code.

While selecting suppliers, we give preference to the socially and environmentally progressive ones. However, failure to comply with the standards and provisions set forth in this Code may result in their disqualification.

Fundamental to adopting our Code is the understanding that a business, in all of its activities, must operate in full compliance with the Indian local/ state / central government laws, rules and regulations. This Code encourages Supplier to go beyond legal compliance, drawing upon internationally recognized standards, industry best practices in order to advance social and environmental responsibility.

For the purposes of this document "supplier" means any company, corporation, individual or other entity that sells, or seeks to sell services to Marvel including the supplier's employees, agents and other representatives.

A. Labor

Suppliers should recognize and be committed to upholding the human rights of workers, and to treat them with dignity and respect.

The labor standards are:

1) Freely chosen employment

Forced, bonded or indentured labor or involuntary prison labor is not to be used.

All work must be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to hand over government-issued identification, passports, etc. as a condition of employment.

2) Child labor

No form of child labor is to be used at any stage. The term "child" refers to any person employed under the age of 15 (or as defined by the Indian law), or under the age for completing compulsory education, or under the minimum age for employment in the country.

Workers under the age of 18 shall not perform hazardous work and may be restricted from night work with consideration given to educational needs.

3) Discrimination

There shall be no discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status in hiring, promotions, rewards and access to training. In addition, workers or potential workers should not be subjected to medical/pregnancy tests that could be used in a discriminatory way.

Workers with disabilities will be provided reasonable job accommodations as needed to perform their job function.

4) Harsh or inhumane treatment

There shall be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor shall there be a threat of any such treatment.



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5) Minimum wages

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime charges and legally mandated benefits. Any disciplinary wage deductions are to conform to the local laws.

6) Working hours

Studies of good manufacturing practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers should be allowed at least one day off in a seven-day week.

B. Health and safety

Suppliers should recognize that a safe and healthy work environment enhances the quality of products and services, consistency of production and workers' morale.

Management systems such as OHSAS 18001 on Occupational Safety and Health have been used as references in preparing this Code and may be a useful source of additional information.

The health and safety standards are:

1) Machine safeguards

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers.

2) Industrial hygiene

Exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

3) Safety

Workers' exposure to workplace safety hazards (e.g., electrical and other energy sources, fire, vehicles, slips, trips and fall hazards) is to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout / tagout). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment.

4) Emergency preparedness and response

Emergency situations and events are to be identified and assessed and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

5) Occupational injury and illness

Procedures and systems are to be in place to manage, track and report occupational injury and illness, including provisions of necessary medical treatment, corrective measures to prevent such exigencies and active worker reporting.



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6) Physically demanding work

Worker exposure to physically demanding tasks, including manual material handling and lifting heavy weights, prolonged standing and highly repetitive tasks are to be identified, evaluated and controlled.

7) Dormitory and canteen

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by the supplier or a labor agent need to be clean, safe, and have provision for emergency egress, adequate ventilation and reasonable personal space.

C. Ethics

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents would need to uphold the highest standards of ethics including:

1) Integrity

The highest standards of integrity expected in all business interactions. Corruption extortion and embezzlement in all forms are strictly prohibited resulting in immediate termination and legal actions.

2) Disclosure and privacy

Means to effectively safeguard customer information regarding business activities, structure, financial situation, performance, and/or any other information deemed confidential should be disclosed only in accordance with the guidelines specified within any agreed upon non-disclosure agreement between supplier and Marvel and within the guidelines of all applicable laws and regulations.

3) No improper advantage

Bribes or other means of obtaining undue advantage are not to be offered or accepted. No supplier, or representatives / employees, shall offer to any Marvel employee a kickback, favor, gratuity, entertainment or anything of value to obtain favorable treatment. Marvel employees are similarly prohibited from soliciting such items. This prohibition extends to immediate family members of both suppliers and Marvel employees. As long as a gift is not intended to obtain favorable treatment for the suppliers and does not create the appearance of a bribe, kickback, payoff or irregular type of payment, Marvel employees are not prohibited from accepting the gift if: (a) it is Rs 500/- or less in value, (b) public disclosure would not embarrass Marvel, (c) acceptance is consistent with Marvel business practices and (d) acceptance of the gift does not violate any applicable law. Furthermore, Marvel employees are prohibited from accepting IPO stock from Marvel's suppliers.

4) Fair business, advertising and competition

Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of Central Antitrust Laws (Competition Act 2002).

5) Whistle blowers

Marvel ensures the confidentiality of whistleblowers, whether they are suppliers or employees. Suppliers shall promptly notify Marvel's Chairman & Managing Director at 9880838202 of any known or suspected improper behavior by suppliers or Marvel employees.