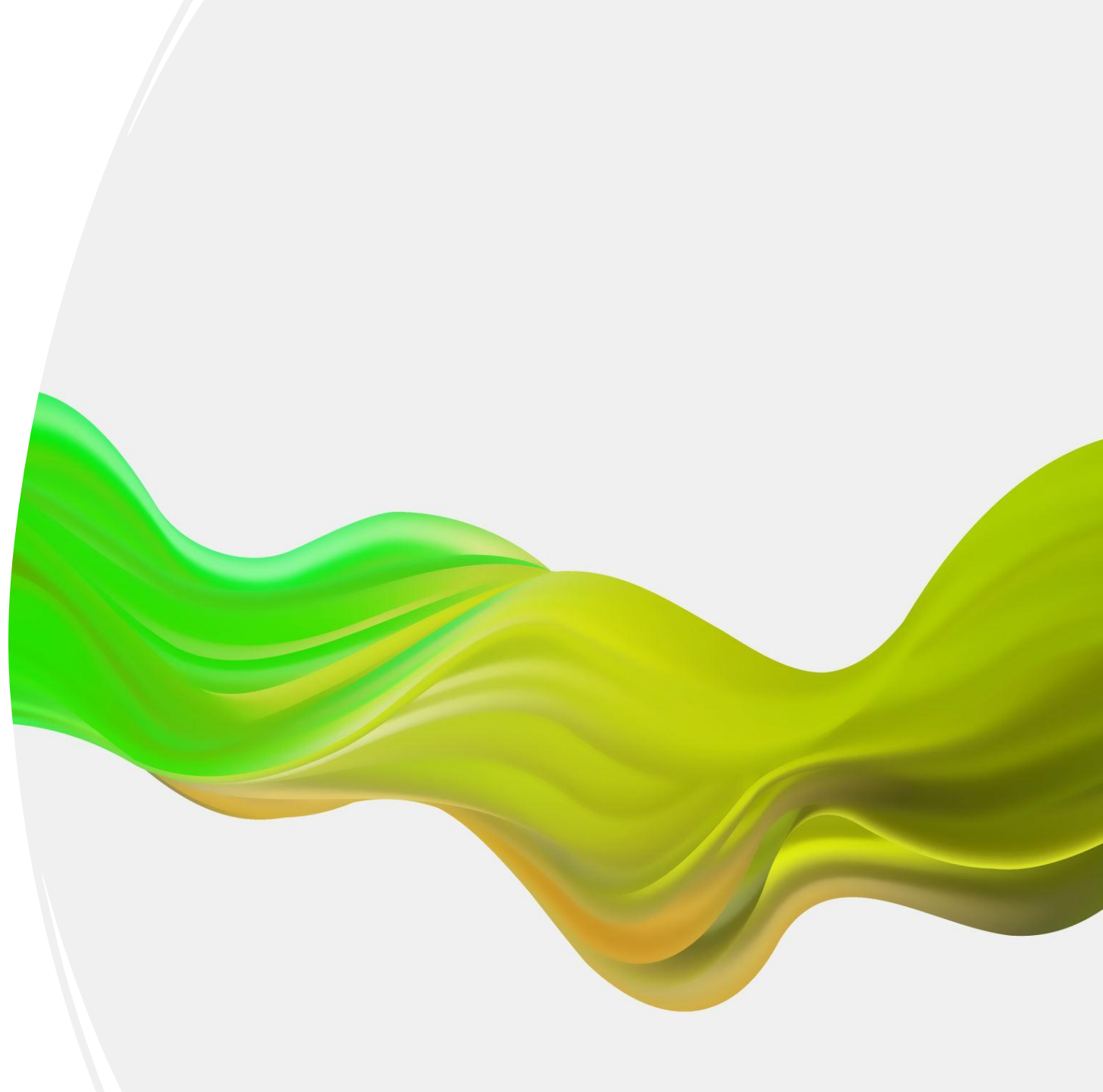


Benir eWaste Solutions

Code of Conduct



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From the CEO

At Benir we are in the middle of one of the most important transformations ever since the entry into the industrial and later IT technology and information society era. The world has been acting mostly around a linear consumption model until now, rapidly draining the resources of our planet and creating a huge negative impact on climate change and the atmosphere. Benir is operating as a key player in the Indian market, an inspiration, and a role model for the recycling industry to change into a circular way of doing business. With our solutions, our skilled engaged staff and dedicated management we are here to make a difference.

This can all be done only through acting responsibly with each other and other stakeholders. We deeply believe in our shared ambition to foster a better world. As a united team of change makers, our corporate culture is deeply rooted in our core values: integrity, accountability and collaboration. These values are complemented by foundational principles of sustainability, business acumen, inclusiveness, respect, and a culture of feedback. Our aim is to not only reduce the industry's negative footprint but also to redefine the way humans engage with IT, ensuring a lasting positive impact on society.

At Benir, we maintain a zero-tolerance policy towards unethical behaviour.

Our Code of Conduct clearly outlines the ethical standards and business expectations we stand by and expect every member of the Benir family to uphold — this includes our entire organization, subsidiaries, consultants, and all representatives acting on our behalf. Every associate is expected to be well acquainted with, and abide by, these guidelines. It's our collective responsibility to ensure that the essence of this code is both understood and adhered to.

Thank you for being a valued member of the Benir family, following principles outlined in our Code of Conduct and all working together towards a better world. Let's champion circular tech and strive to become the world's best tech as-a-ser-vice company. As we embark on this journey, let's prioritize care for one another, our partners, and society at large.



Hirji Narayan Patel
CEO Benir Group



Our Values in Action


1.1 Purpose – this Code of Conduct is our compass and values

This Code of Conduct Policy (the Code) clarifies and outlines what is expected from us as individuals and as a company. It outlines and demonstrates our commitment to ethical conduct and international standards. We can think of it as a compass that helps keep us on course with our values. Use this document as a tool to guide our decision making.


Values are what we value:



Integrity



Accountability



Collaboration

Every one of us plays a crucial role in upholding our values. Obviously, we're human beings, and none of us are perfect. But we are in this together. We are expected to speak up if there's potential for improvement; after all, growth thrives on constructive feedback.

Beyond these core values, our foundational pillars define us: commitment to sustainability, a keen business acumen mindset, inclusiveness, respect, and a culture of feedback. These pillars, combined with our values, forge the unique Benir Spirit.

If you ever find yourself uncertain about an action or need clarity on interpreting the Code in light of our values, please reach out to your manager, local People and Culture Partner, or the Chief Sustainability Officer.

1.2 Scope and applicability – where and to whom does this apply?



Our Code sets forth the standards of ethical behaviour expected of every Benir employee and representative across all countries in which we operate. While the Code provides guidance, it cannot account for every possible scenario we might face during our work at Benir. Hence, individual responsibility and compliance with the Code are paramount. This strong ethical foundation drives Benir to always make the right choices. We are committed to doing good, and we trust in each individual's moral compass and ambition to guide actions even in situations not explicitly addressed by this document.



It is the duty of Benir managers to ensure that both the essence and specifics of this document are effectively communicated, comprehended, and integrated into our daily operations.



Benir is committed to adhering to local laws and regulations in every country and jurisdiction where we have a presence. If local laws are ever silent, our ethical standards as outlined in this Code will guide us. In instances where there's a discrepancy between local laws and the principles set in this Code, we always strive to uphold a higher standard, ensuring sustainable operations, provided it does not contravene local legislation. Furthermore, we have more detailed policies and guidelines concerning specific issues in place. We urge everyone to stay informed and familiarize themselves with policies relevant to their roles and daily tasks.

1.3 Violations

At Benir we have zero tolerance for violations of the Code, and we take failures to comply with the Code and its related rules seriously. Violations can lead to disciplinary measures, potentially including dismissal or legal repercussions.

1.4 Speak up

All of us bear the responsibility to voice concerns if we suspect violations of the Code, our rules, or the law, especially when it involves someone representing Benir. Not addressing these concerns equates to a breach of the Code itself. You don't need concrete evidence or absolute certainty to report a concern; it's the act of reporting that's crucial. Benir fosters a culture where everyone should feel safe in voicing their concerns. By doing so, we ensure that any irregularities are tackled head-on, guaranteeing our actions remain legal and ethical. Importantly, Benir strictly prohibits retaliation against anyone who reports concerns or violations in good faith.

To put it simply: if in doubt, speak out using the channels available.

Our shared commitment to maintaining high standards and supporting one another ensures we can proudly stand behind Benir's name, both now and in the future.

Manager or local People and Culture Partner

Managers are entrusted with the responsibility of helping employees grasp and implement the Code, its supporting rules, and the law. They can address many concerns directly. However, if employees are uncomfortable discussing these issues with their managers, they have the option to reach out to their local People and Culture Partner or our CSO directly.

Do Business with Integrity



We act with honesty, fairness, and transparency in all our dealings, both internally and externally.



Honesty and Transparency: We communicate openly and truthfully with all stakeholders, including employees, customers, partners, and regulators. We provide accurate and complete information about our operations, processes, and environmental impact.



Fairness and Impartiality: We treat all individuals and organizations with fairness and impartiality, regardless of their size, influence, or relationship with Benir. We avoid favouritism and ensure that our decisions are based on objective criteria and ethical considerations.



Ethical Business Practices: We conduct our business with the highest ethical standards, avoiding any practices that could compromise our integrity or reputation. We reject all forms of bribery, corruption, and unethical behaviour.



Confidential Information: We respect the confidentiality of sensitive information entrusted to us by our clients, partners, and employees. We do not disclose or misuse such information for personal gain or any other unauthorized purpose.

Do Business with Accountability



Accurate Record-Keeping: We maintain accurate and complete records of our operations, financial transactions, and environmental performance. We are transparent in our reporting and ensure that our data is reliable and verifiable.



Personal Accountability: We take responsibility for our actions and decisions, acknowledging and correcting any mistakes or errors promptly and transparently. We are accountable to our stakeholders and strive to maintain their trust and confidence.



Ownership and Responsibility: We take ownership of our tasks, projects, and decisions, recognizing that our actions have consequences. We are responsible for delivering results and meeting commitments, both individually and as a team.



Transparent Communication: We foster open and honest communication, ensuring that information flows freely within the division and with external stakeholders. We proactively share updates, address concerns, and provide constructive feedback.



Performance Evaluation: We establish clear performance expectations and conduct regular evaluations to track progress and identify areas for improvement. We provide feedback and support to help employees grow and develop.



Consequences and Learning: We acknowledge mistakes and errors, take corrective action, and learn from our experiences. We create a safe environment where employees feel comfortable reporting concerns and seeking guidance without fear of retribution.



Continuous Improvement: We are committed to ongoing learning and development, seeking new and better ways to achieve our goals and enhance our performance. We embrace feedback and adapt our strategies to ensure continuous improvement.



Collective Responsibility: We recognize that accountability is a shared responsibility. We support each other in achieving our goals and hold each other accountable for upholding the values and principles of the e-waste division.

Do Business with Collaboration



Teamwork and Mutual Respect: We value teamwork and believe that collaboration leads to better outcomes. We treat each other with respect and dignity, recognizing that everyone's contributions are valuable. We create an environment where diverse perspectives are welcomed and encouraged.



Open Communication and Information Sharing: We foster open communication and transparent information sharing across teams and departments. We actively listen to each other's ideas, provide constructive feedback, and work together to find solutions.



Shared Goals and Objectives: We align our individual and team goals with the overall objectives of the e-waste division. We collaborate to achieve these shared goals, celebrating successes and learning from challenges together.



Support and Empowerment: We support and empower our colleagues, providing them with the resources and guidance they need to succeed. We foster a culture of mentorship and knowledge sharing, helping each other to grow and develop.



Conflict Resolution: We address conflicts in a constructive and respectful manner, seeking solutions that benefit the team and the organization. We avoid personal attacks and focus on finding common ground and achieving win-win outcomes.



Cross-functional Collaboration: We recognize the importance of collaboration across different functions and departments. We break down silos, build bridges, and work together to achieve shared objectives.

Guiding Principles

Compliance: We adhere to all applicable laws, regulations, and industry standards related to e-waste management.

Environmental Responsibility: We minimize environmental impact through responsible collection, recycling, and disposal practices.

Data Security: We protect the confidentiality and security of all sensitive data entrusted to us by our clients and partners.

Health and Safety: We prioritize the health and safety of our employees, customers, and the communities we serve.

Conflict of Interest: We avoid any conflicts of interest that could compromise our objectivity or decision-making.

Fair Competition: We compete fairly and ethically in the marketplace, respecting the rights of our competitors.

Anti-Corruption: We reject all forms of bribery and corruption, upholding the highest standards of ethical conduct.

Respect and Diversity: We treat all individuals with dignity and respect, fostering a diverse and inclusive workplace.



Policy Basics

Policy Basics	
Version	1
Document Owner	Benir eWaste Solutions
Document Author	Nayan Patel
Reviewed	Yearly
Approved By	Hirji Narayan Patel
Approval Date	10 Sep 2024