



# Code of Conduct



Farrokh N Cooper  
Chairman & Managing Director

## 🌸 Cooper Code of Conduct:

### A. Introduction

After 49 years in business, I would like to share all in Cooper some things about my life what made me succeed.

These are the things I want all at Cooper to emulate.

If steel loses its temper, it loses its strength so therefore if you don't want to lose your strength never lose your temper.

Is business all about technology, quality, and consistency or is it about integrity, sincerity, fidelity, and honesty. The answer is:

Today in business, people look at the culture of the person and the company.

People look to see the upbringing of the person.

Manners maketh man. If you say please and thank you, it costs you nothing, but it shows good upbringing. It shows your culture.

If you show respect, you will stand up when a guest or an elderly person or a lady enters the room.

It is important that there is to be no difference between what you say and what is the actual truth, you must be taken at face value, integrity, honesty, fidelity, sincerity is integral for the culture of the company and the individual.

If you are transparent, humble, and understanding, you will create empathy and confidence in your customer, in your society and your home for long term harmonious relations. If you have broken or damaged company property, be humble enough to admit your mistake.

Why is Cooper, what it is? I have travelled the world many times and I have travelled across India too but wherever I have gone with these attributes, I have laid the foundation of long-term associations ranging from 60 years relationships downwards.

This has what have made Cooper grow. People feel confident, people feel happy to spend their lives associating with us and this is the natural synergy of life.

In the past 15 days twice, I have received awards for lifetime achievements – one from the Times of India another “Jeevan Gaurav” from Shrimant Chhatrapati Udayan Raje Bhosale Foundation of Cultural Activities, Satara.

The Satara Municipality approached me and asked me to give a name to the road on which I live – I chose my mother's, as she taught me the above values and sent me to schools who taught me the same.



Farrokh N Cooper  
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### B. Introduction

The Municipality has acknowledged the work done by my Grand Father Sir D. B. Cooper.

These spontaneous gestures are an acknowledgement by the citizens (common man) of Satara for the values, culture, and behavior I have cherished and imbibed all my life.

In my life I have been tossed and turned at a moment's notice from one crisis to another, but never once have I failed to overcome the challenge with my values.

Be it a customer, be it a banker, be it a worker, or government official or the man in the street I have always received a helping hand when there was none available.

I want each and every one of you to understand and emulate these principles.

**Farrokh N Cooper**

**Chairman & Managing Director**

**Date: 14.07.2023**

## B.

### Compliance with Laws & Regulations:

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We expect all employees to perform their duties in accordance with applicable laws, rules, and regulations and in an ethical manner.

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## C.

### Personnel & Business Practices

#### 1. Human Rights:

At Cooper Corporation Pvt. Ltd., we are committed to upholding and promoting human rights as outlined in the Universal Declaration of Human Rights (UDHR) and aligned with the principles of the United Nations Global Compact (UNGC). This Human Rights Policy outlines our commitment to respect and advance human rights within our operations, supply chain, and communities where we operate.

- 1.1 Respect for Human Rights:
- 1.2 Labor and Employment Rights:
- 1.3 Human trafficking, Child Labor, and Forced Labor:
- 1.4 Health and Safety:
- 1.5 Supply Chain Responsibility:
- 1.6 Non-Discrimination and Equal Opportunities:
- 1.7 Community Engagement:
- 1.8 Respect for Freedom of Association and Collective Bargaining:
- 1.9 Employee Representation and Participation:
- 1.10 Communication and Information Sharing:
- 1.11 Conflict Resolution and Dispute Settlement:
- 1.12 Human Rights Due Diligence:
- 1.13 Reporting and Transparency:
- 1.14 Continuous Improvement:

- Refer “Human Rights Policy” in details.  
Ref. No.: CCPL/CSR/HR-06

Refer below separate policy, which we linked under “Human Rights Policy”.

- Refer “Discrimination, Harassment & Retaliation”.
- Refer “Sexual Harassment at workplace policy”.
- Refer “Handling Employee Grievances”
- Refer “Policy on Maternity Benefit”.

## 2. Corporate Social Responsibility (CSR):

At Cooper Corporation Pvt. Ltd., we are committed to conducting our business in a socially responsible and sustainable manner. We recognize our responsibility towards the environment, communities, employees, customers, and other stakeholders. This Corporate Social Responsibility (CSR) policy outlines our commitment to integrating social, environmental, and ethical considerations into our operations and decision-making processes.

- 2.1 Environmental Stewardship:
- 2.2 Ethical Business Practices:
- 2.3 Health and Safety:
- 2.4 Employee Well-being and Development:
- 2.5 Supplier Relationships and Responsible Sourcing:
- 2.6 Community Engagement:
- 2.7 Product Responsibility:
- 2.8 Stakeholder Engagement:
- 2.9 Measurement and Reporting:
- 2.10 Continuous Improvement:

Refer “Corporate Social Responsibility Policy” in details. Ref. No.: CCPL/CSR/HR-03

- “CSR Policy” - “Quality Policy”

## 3. Environment Policy:

At Cooper Corporation Pvt. Limited, we recognize our responsibility to minimize the environmental impact of our manufacturing operations. We are committed to producing products that are efficient, sustainable, and compliant with environmental regulations. We endorse and strive to contribute towards achievement of the global UN Sustainable Development Goals (UN SDGs) and India’s Nationally Determined Contributions (NDCs).

This policy outlines our approach to environmental stewardship and sets the foundation for integrating sustainable practices across our operations.

- 3.1 Compliance with Environmental Regulations:
- 3.2 Pollution Prevention.
- 3.3 Resource Efficiency:
- 3.4 Water management
- 3.5 Materials and waste management
- 3.6 Sustainable Supply Chain:
- 3.7 Biodiversity
- 3.8 Product Design and Development:
- 3.9 Employee Engagement and Training:
- 3.10 Continuous Improvement:
- 3.11 Stakeholder Communication:
- 3.12 Community Engagement:

[Refer “Environment Policy” in details.](#)

Ref. No.: CCPL/CSR/HR-04

- [Refer HSE policy.](#)

## 4. Ethics Policy:

At Cooper Corporation Pvt. Ltd., we are committed to conducting our business with the highest standards of ethics, integrity, and professionalism. This Code of Conduct and Ethics Policy provides guidance to all employees, contractors, and stakeholders on the expected behaviors and ethical principles that underpin our operations. This code adheres to the principles of United Nations Global Compact (UNGC) and Companies Act 2013 (India). By adhering to this code, we promote trust, accountability, and responsible decision-making throughout our organization.

- 4.1 Compliance with Laws and Regulations:
- 4.2 Ethical Conduct:
- 4.3 Integrity and Honesty:
- 4.4 Respectful and Inclusive Workplace:
- 4.5 Confidentiality and Data Protection:
- 4.6 Fair Competition:
- 4.7 Conflict of Interest:
- 4.8 Anti-Bribery and Anti-Corruption:

- 4.9 Prevention of Fraud and Money laundering:
- 4.10 Health and Safety:
- 4.11 Environmental Responsibility:
- 4.12 Accuracy of Records and Financial Reporting:
- 4.13 Reporting Violations and Whistle-blower Protection/Non-Retaliation:
- 4.14 Consequences of Non-Compliance

Refer “Ethics Policy” in details.

Ref. No.: CCPL/CSR/HR-05

Below policy we refer separately under Ethics policy.

- Refer “Discrimination, Harassment & Retaliation”.
- Refer “IT policy” & “IPR & Data Security”.
- Refer “Sexual Harassment at workplace policy”.
- Refer “Grooming & Appearance guidelines”.
- Refer “Policy Protocol for contacting Female employees post office hours”.
- Refer “Adaptive Work Culture Policy\_ Shared Values Policy”.

## 5. Product use and Lifecycle Policy:

At Cooper Corporation Pvt. Ltd., we are committed to ensuring the responsible use and proper disposal of our products throughout their lifecycle. This Product Use and End-of-Life Policy outlines our commitment to promoting safe and efficient product use, maximizing product lifespan, and minimizing the environmental impact of product disposal.

- 5.1 Product Safety and User Education:
- 5.2 Product Durability and Reliability:
- 5.3 Energy Efficiency and Resource Conservation:
- 5.4 Product Repair, Maintenance, and Upgrades:
- 5.5 Product Take-Back Programs / Recall:
- 5.6 Sustainable Packaging:
- 5.7 Product Lifecycle Assessment:
- 5.8 Stakeholder Engagement and Collaboration:
- 5.9 Compliance and Legal Requirements:

- 5.10 Continuous Improvement:

Refer “Product use and Lifecycle Policy” in details.

Ref. No.: CCPL/CSR/HR-07

- HSE policy

## 6. Safety, health, and well-being Policy:

At Cooper Corporation Pvt. Ltd., we prioritize the health, safety, and well-being of our employees, contractors, and visitors. We are committed to creating and maintaining a safe and healthy work environment in our manufacturing operations. This Policy outlines our dedication to preventing workplace injuries, promoting a culture of safety, and complying with applicable health and safety regulations.

- 6.1 Compliance with Health and Safety Regulations:
- 6.2 Risk Assessment and Hazard Control:
- 6.3 Safe Work Practices and Procedures:
- 6.4 Emergency Preparedness and Response:
- 6.5 Safety Training and Competence:
- 6.6 Incident Reporting and Investigation:
- 6.7 Health and Wellness:
- 6.8 Workplace Ergonomics:
- 6.9 Adequate Facilities:
- 6.10 Work-Life Balance:
- 6.11 Safety Committees and Employee Participation:
- 6.12 Contractor Safety:
- 6.13 Continuous Improvement:

Refer “Safety, health and well-being Policy” in details.

Ref. No.: CCPL/CSR/HR-08

- Refer “Policy-Employment Health Criteria”
- Refer “HSE Policy”.

## 7. Training and development Policy:

At Cooper Corporation Pvt. Ltd., we recognize the importance of career development and training in fostering a skilled and motivated workforce. This Career Management and Training Policy outlines our commitment to providing opportunities for professional growth, continuous learning, and career advancement for our employees.

7.1 Career Development Opportunities:

7.2 Performance and Development Discussions:

7.3 Training and Learning Programs:

7.4 Skills Enhancement and Upskilling:

7.5 Talent Management & Career Mobility:

7.6 Employee Engagement and Support:

7.7 Recognition and Rewards:

7.8 Succession Planning:

7.9 Compliance and Legal Requirements:

Refer "Training and development Policy" in details.

Ref. No.: CCPL/CSR/HR-09

- Refer "Performance Appraisal KRA setting Process".
- Refer "Sir DB Cooper Award for Performance Excellence".
- Refer "Cooper Learning Policy".

## D.

### Infringements and Penalties

If you are unsure about the proper course of action or how this Code should be interpreted in any situation, be sure to seek guidance from the Governance and Compliance Department.

#### ● WITHIN THE BUSINESS UNIT OR GLOBAL STAFF AREA:

Generally, an employee's Human Resources manager will be able to resolve any concerns or questions he/she might have.

#### ● GOVERNANCE & COMPLIANCE

Employees may report concerns to the Governance & Compliance Department by sending an email to [nitin.deshpande@coopercorp.in](mailto:nitin.deshpande@coopercorp.in)

- Refer "Cooper Policy & Framework on Vigil Mechanism". As per policy below members appointed for complaints.

1) Mr. Rajesh Deshpande, CFO

(Vigilance officer for considering complaints against employees)

2) Mr. Farrokh N. Cooper (CMD)

(Vigilance officer for considering complaints against Directors)

- Process for handling Employee Grievances (For staff & workmen)

1) Mr. Nitin Deshpande (CHRO)

Refer "Policy on Vigil Mechanism - Whistle Blower Policy"

#### ● TRANSPARENCY HELPLINE

Cooper has established a Transparency Helpline that is accessible toll-free in the countries listed on the next page. Employees may submit reports to the Helpline anonymously or indicate that they wish to be contacted.

### 5.1 Penalties for Breaches

Employees or contractors in breach of this Code are subject to disciplinary actions ranging from a warning to termination of employment or contract. The severity of such disciplinary actions will depend on the seriousness of the breach and on whether the breach came from an error, willful misconduct,

or negligent action. Employees or contractors may also be subject to civil and criminal penalties if the law has been breached.

If a supplier is found to have breached this Code, Cooper may develop a corrective action plan and monitor the progress of the supplier for a specified time-frame depending on the severity of the breach). Cooper may terminate its relationship with any supplier that repeatedly and knowingly violates this Code and refuses to implement improvement plans.

This Code of Conduct (the “Code”) reflects our commitment to a culture of integrity, honesty, and accountability and outlines the basic principles and policies that all employees are expected to follow. Additionally, this Code helps our employees put these principles and policies into practice by providing guidance on actions and behaviors that support our company’s values.

We expect our employees to follow this Code and to consult their Human Resources Manager with questions regarding any particular practice or activity. While this Code does not cover all possible scenarios, it is designed to establish a common framework that helps employees to understand their ethical obligations.

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### **EMPLOYEE ACKNOWLEDGEMENT FORM**

I hereby acknowledge that I have received a copy and read the Cooper Code of Conduct and that I agree to act in ongoing compliance with all terms of the Code and all related policies and procedures as is required as part of my employment. I will report any potential violation of which I become aware promptly. I also understand that if I have any questions about this Code or how it pertains to my job, I may contact the Human Resources Manager.

Employee Name: \_\_\_\_\_

Employee Number: \_\_\_\_\_

Job Title: \_\_\_\_\_

Site: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_