

III. Vendor Ethical Code of Conduct, Anti-Bribery & Anti-Corruption Policy

1. Purpose

This Policy defines the ethical, legal, and compliance standards that all vendors must follow when registering on the Phileein Hospitality Private Limited's Vendor Portal. The Portal enables multiple companies/entities to purchase products and services.

The aim of this Policy is to ensure that all vendor engagements are conducted with integrity, transparency, and accountability, while strictly prohibiting bribery, corruption, or unethical practices.

2. Scope

This Policy applies to:

- All vendors, suppliers, service providers, contractors, and their representatives registering on the Vendor Portal.
 - All transactions and interactions with any companies/entities registered under the Vendor Portal.
 - Any subcontractors, agents, or third parties engaged by vendors for portal-related activities.
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3. Ethical Business Practices

Vendors shall:

- Conduct business honestly, fairly, and with integrity.
 - Comply with all applicable laws, rules, and regulations in the jurisdictions where they operate.
 - Avoid fraudulent, deceptive, or misleading practices.
 - Ensure that products and services provided are of the quality, safety, and authenticity promised.
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4. Anti-Bribery and Anti-Corruption

Vendors must not, directly or indirectly:

- Offer, promise, solicit, or accept bribes, kickbacks, or improper payments to secure or influence business.

- Provide cash, gifts, favors, hospitality, entertainment, or services to employees or representatives of the Company or entities under the Portal with the intent of influencing decisions.
 - Engage in or support facilitation payments (unofficial payments to speed up routine processes).
 - Use agents, consultants, or intermediaries to make improper payments on their behalf.
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5. Fair Competition

- Vendors must compete fairly and comply with all applicable competition and anti-trust laws.
 - Collusive practices such as price-fixing, bid-rigging, or market allocation are strictly prohibited.
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6. Human Rights and Labour Standards

- Vendors must not use child labour, forced labour, or exploitative practices.
 - Vendors must provide a safe and inclusive workplace, free from discrimination and harassment.
 - Vendors must comply with laws governing wages, working hours, and employee rights.
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7. Environmental Responsibility

- Vendors are encouraged to adopt sustainable and environmentally responsible practices.
 - Vendors must comply with applicable environmental laws relating to their operations, packaging, and products.
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8. Confidentiality and Data Protection

- Vendors must protect the confidential information, trade secrets, and intellectual property of the Company and its group entities.
 - Vendors must comply with applicable data protection and privacy regulations.
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9. Conflict of Interest

- Vendors must avoid conflicts between their personal or financial interests and their obligations to the Company or entities under the Portal.
 - Any actual or potential conflicts of interest must be disclosed promptly.
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10. Reporting Misconduct

- Vendors must report any suspected or actual violation of this Policy, including bribery, corruption, fraud, or unethical conduct.
- Reports may be submitted through the Company's whistleblowing or grievance mechanism which is listed below:

Email Id: info@phileeinhospitality.com

Email Id: nitin.rajenimbalkar@phileeinhospitality.com

Email Id: prashant.joshi@phileeinhospitality.com

- All reports will be treated with confidentiality, and no retaliation will occur against vendors who report in good faith.
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11. Compliance and Consequences

- Compliance with this Policy is a mandatory requirement for vendor registration and continued engagement with entities under the Vendor Portal.
 - Violations of this Policy may lead to:
 - Rejection or suspension of vendor registration,
 - Termination of business relationships,
 - Blacklisting from future business opportunities,
 - Legal or regulatory reporting where applicable.
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12. Acknowledgment

By completing the registration process on the Vendor Portal, vendors confirm that they have read, understood, and agreed to comply with this Vendor Ethical Code of Conduct, Anti-Bribery & Anti-Corruption Policy, applicable to all companies/entities registered under the Portal.