10. Supplier Code of Conduct

Policy Reference	Version	Effective Date	Review Cycle	Approved By
EPS-POL-SCC-009	v1.0	19 April 2026	Annual	Durganand Jha, Founding Partner

10.1 Purpose

Elevion extends its ethical, labour, environmental, safety, privacy, and security standards to all third parties it engages. This Supplier Code of Conduct defines the standards required to do business with Elevion. Each Supplier is responsible for ensuring that its own sub-contractors, vendors, and agents comply with these same standards.

10.2 Acceptance

By entering into any agreement with Elevion, whether a Master Services Agreement, a Statement of Work, a Non-Disclosure Agreement, a Data Processing Agreement, a Partnership Agreement or a Purchase Order; each Supplier is deemed to have read, understood and accepted this Code.

10.3 Ethical conduct

Each Supplier must conduct business honestly and with integrity. This includes avoiding and disclosing any conflict of interest that may affect its work. Suppliers are prohibited from offering employment, consultancy roles, or financial incentives to any employee or partner of the Company during the active term of their engagement.

10.4 Labour and human rights

Each Supplier must:

- Not use child labour, forced labour, bonded labour, trafficked labour or any involuntary labour.
- Not use corporal punishment, mental coercion or physical abuse as a means of discipline.
- Respect the freedom of association of its workers.
- Pay at least the minimum wage applicable in the jurisdiction where its workers are based and make all mandatory statutory remittances (equivalents of EPF, ESIC and Professional Tax in India, or the corresponding statutes in the Supplier's country).
- Respect applicable working-hour and overtime limits (not exceeding 60 hours per week including overtime, save in exceptional circumstances permitted by law).
- Provide a grievance mechanism that allows its workers to raise concerns without retaliation.
- Be an equal opportunity employer and not discriminate on the basis of race, religion, caste, colour, creed, national or social origin, sex, gender identity, sexual orientation, age, marital status, pregnancy, disability, political opinion or any other protected characteristic.

10.5 Health, safety and environment

Suppliers must provide a safe working environment and comply with all applicable laws. Each Supplier shall actively seek to reduce its carbon footprint and minimise waste generation through resource efficiency and proper disposal arrangements, including e-waste management.

10.6 Data protection and information security

Where the Supplier processes personal data or confidential information on behalf of Elevion or Elevion's clients, the Supplier must:

- Comply with all applicable data protection laws in the jurisdictions where the data originates or the data subjects reside, including (where relevant) DPDPA 2023, GDPR, and any other regional or national data protection legislation applicable to the engagement.
- Implement technical and organisational measures appropriate to the sensitivity of the data, at a minimum equivalent to those described in Elevion's Information Security Policy.
- Notify Elevion promptly of any actual or suspected data breach.
- Enter into a Data Processing Agreement where required by the engagement.

10.7 Anti-modern-slavery and anti-trafficking

Suppliers must not engage in or be associated with human trafficking, modern slavery, or any form of exploitative labour, anywhere in their operations or supply chain.

10.8 Right to audit

Elevion reserves the right to request information to verify compliance with this Code. The Supplier must provide the requested documentation or facilitate the review within ten business days of a written request. For high-risk engagements, Elevion may conduct or commission an audit of the Supplier's operations on reasonable notice.

10.9 Reporting

Any person, whether a Supplier's worker, an Elevion employee, a client, or a member of the public may report a suspected breach of this Code to any Founding Partner of Elevion. Reports are handled confidentially and without retaliation against the person making them.

10.10 Consequences of breach

A Supplier's breach of this Code may result in remedial action, suspension of work, or termination of the engagement, in accordance with the relevant agreement and applicable law.

Revision history

v1.0 dated 19 April 2026, Initial issue. Reviewed 2 September 2026 as part of the pack refresh; no change required.

Signed on behalf of Elevion Partners Solutions India Private Limited:

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Durganand Jha

Founding Partner and Director

Date: 2 September 2026