

Purpose:

Astra Microwave Product Limited (AMPL) is dedicated to providing advanced technological solutions to its clients and recognizes the importance of sustainable procurement. AMPL considers sustainable procurement not merely a responsibility, but a strategic imperative to ensure the quality, reliability and long-term value of the technological solutions delivered to customers. The Company prioritizes ethical sourcing, resource efficiency, and supplier accountability, and aims to build a sustainable and resilient supply chain.

This Code of Conduct outlines AMPL's commitment to ethical practices, regulatory compliance, and responsible behavior across its supply chain, with a focus on environmental, social and governance (ESG) aspects.

This Code is aligned with applicable Indian regulations (including SEBI BRSR requirements) and internationally recognized standards such as the UN Global Compact, ILO Conventions, and OECD Guidelines for Multinational Enterprises.

Scope:

The Code applies to all suppliers and third-party entities doing business with AMPL including contractors, subcontractors, vendors, agents, consultants, collaborators and their representatives (hereinafter collectively referred to as 'Suppliers'), providing supplies for our business.

The Supplier Code of Conduct ("The Code")

1. Environment:

AMPL adheres to the highest standards of environmental compliance, underscoring its commitment to environmental preservation as a collective responsibility and actively work towards realizing these objectives. The Company requires its suppliers to integrate environmental considerations into their operations and to continuously seek improvements to minimize or mitigate any adverse environmental impacts. To achieve this, suppliers are required to:

- Ensure adherence to all relevant environmental laws and regulations at local, national and international level.
- Ensure efficient utilization of resources throughout the operations, prioritizing waste reduction and enhancing the value of materials over their lifecycle.
- Track and monitor the air quality and take measures to control the emissions. Ensure compliance with relevant air quality standards and regulations.

- Track and monitor the water usage (withdrawal, consumption and discharge) across the operations and implement measures to reduce water consumption and manage wastewater effectively.
- Take initiatives to optimize energy consumption by using energy efficient processes and reduce emissions.
- Implement measures to reduce waste generation and adopt the 3R approach of reduce, reuse and recycle.
- Encourage circular economy practices by reusing and recycling materials and lower the harmful environmental impact.
- Bring down the greenhouse gas emissions and support carbon neutrality measures by tracking and monitoring both the direct and indirect GHG emissions.
- Take proactive measures to reduce the carbon footprint and implement initiatives to offset the carbon emissions and achieve carbon neutrality.
- Maintain all required environmental permits, approvals and consents relevant to operations.
- Ensure safe handling, storage, transportation and disposal of hazardous substances in accordance with applicable regulations.
- Environmental expectations shall be implemented in a manner proportionate to the nature, scale and environmental impact of the supplier's operations.

2. Human Rights:

- Comply with all relevant local, national and international human rights laws and standards.
- Ensure a safe and healthy working environment, fair wages and working conditions for the employees and workers according to relevant regulations.
- Provide all mandatory health and safety trainings, according to the nature of work undertaken by individual employee and workers.
- Abstain from using child labor, coerced labour, contract or bonded labour, as well as modern slavery and human trafficking in any form.
- Enact policies and undertake measures to protect worker's right and ensure minimum safety standard. Respect the right of freedom of association and collective bargaining.
- Ensure an inclusive and diverse workplace which is free from discrimination based on race, gender, sexual orientation, disability and characteristics.
- Implement a fair process for grievance redressal, disciplinary actions and employment termination.

- Provide all required benefits to employees and workers including social security, parental leave and medical and insurance coverage.
- Establish measures for hazard identification, measurement and mitigation process.

3. Product Quality and Safety:

- Make sure that the quality of products and services conforms to all contract terms and conditions.
- Ensure appropriate disclosure on products and services related to environment and social safety.
- Implement measures for continuous improvements in product quality and service delivery.
- Maintain appropriate quality management systems and controls relevant to the nature of products or services supplied.
- Establish product traceability mechanisms and cooperate with AMPL in the event of quality incidents, recalls or investigations.
- Promptly notify AMPL of any quality, safety or compliance risks that may impact supplied products or services.

4. Business Integrity:

- Ensure compliance with all applicable business laws, regulations and standards at local, national and international level.
- Communicate any potential conflict of interest to the company that may affect business decisions or relationships.
- Maintain the highest standard of integrity and transparency in conducting business, ensuring zero tolerance for bribery, corruption and any anti-competitive actions.
- Implement guidelines for data protection and privacy to protect sensitive information, personal data and intellectual property.
- Keep accurate and complete records related to operations, compliance and sustainability efforts. Make sure that records are maintained as per legal and regulatory requirements.
- Comply with applicable export control laws, sanctions regulations and defence-related compliance requirements.
- Prohibit facilitation payments, kickbacks and improper gifts, regardless of local practices.
- Cooperate fully with any investigation related to ethical or legal compliance.

5. Cybersecurity, Data Protection ,Information Security and Privacy (PII)

Suppliers shall establish, implement and maintain robust cybersecurity and information security controls proportionate to the nature, sensitivity and criticality of the data, Personal identifiable information data, systems, Drawings, specifications and services provided to Astra Microwave Products Limited.

Suppliers are required to:

- Comply with all applicable data protection, PII data, information security and cyber laws, regulations and contractual obligations, including requirements relating to defence, national security and critical infrastructure, as applicable.
- Implement appropriate administrative, technical and physical safeguards to protect information and systems from unauthorized access, disclosure, alteration, loss or destruction.
- Ensure secure access controls, authentication mechanisms, encryption (where appropriate), and regular system patching and vulnerability management.
- Establish processes for continuous monitoring, detection and timely response to cybersecurity incidents, breaches or attempted intrusions.
- Promptly notify AMPL of any actual or suspected cybersecurity incident, data breach or compromise that may impact AMPL's data, systems or operations, and cooperate fully in investigation and remediation efforts.
- Restrict access to AMPL data strictly on a need-to-know basis and ensure that personnel handling such data are adequately trained on cybersecurity and information security practices.
- Prohibit the use of AMPL information systems, data or networks for any unauthorized or unlawful purposes.

6. Intellectual Property Rights & Confidentiality

Suppliers shall respect and protect all intellectual property ("IP") rights, confidential information and proprietary technologies belonging to AMPL and its customers, partners and licensors.

Suppliers are required to:

- Use AMPL's intellectual property, confidential information and technical data solely for the purpose of fulfilling contractual obligations and in accordance with agreed terms.
- Not disclose, transfer, reproduce or otherwise use AMPL's confidential or proprietary information without prior written authorization.
- Implement measures to safeguard intellectual property, technical drawings, specifications, software, designs and know-how from unauthorized access, misuse or infringement.
- Ensure that any intellectual property developed in connection with AMPL's contracts is handled strictly in accordance with contractual IP ownership and licensing provisions.

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- Promptly notify AMPL of any suspected or actual infringement, misappropriation or unauthorized disclosure of intellectual property.
- Ensure that employees, contractors and subcontractors are bound by appropriate confidentiality and non-disclosure obligations.

7. Data Security, Data Localization & Record Management

Where Suppliers process, store, transmit or access data relating to AMPL, its customers or defence projects, they shall:

- Ensure that sensitive, confidential and defence-related data is stored, processed and transmitted in accordance with applicable data localization, security and regulatory requirements, as notified by competent authorities.
- Maintain secure data retention, backup and disposal practices to prevent unauthorized access or data leakage.
- Not transfer, host or process AMPL data outside approved jurisdictions without prior written consent, where applicable.
- Maintain accurate, complete and secure records related to operations, compliance, cybersecurity and data protection, and make such records available to AMPL upon request for audit or regulatory purposes.

8. Preferential Procurement:

- Preference should be given to domestic and indigenous suppliers, including MSMEs, subject to quality, security, and regulatory requirements.
- Preference shall be given to suppliers that demonstrate strong ethical practices, regulatory compliance, and adequate information security controls.

Grievance Redressal Mechanism:

- Establish a grievance redressal mechanism that will ensure all grievances are communicated confidentially and without the fear of retaliation.
- All grievances should be investigated in a fair manner and within a specified timeframe.
- Suppliers can report their complaints through AMPL's established channels. For reporting grievance contact us at grievance@astramwp.com. We also have a whistleblower mechanism available at whistleblower@astramwp.com for reporting ethical and legal misconduct.

Implementation of the Code:

- Suppliers must ensure compliance by the code and demonstrate adherence to its standards.
- AMPL may evaluate the compliance with the code by using a comprehensive approach that includes self-assessment and declarations, audits and thorough documentation review.

Supplier Code of Conduct



- Non-compliance with the provisions of the code may result in violation of the supplier's duties. In such circumstances, AMPL reserves the right to take necessary actions, which may result in termination of existing contract or suspensions/removals of non-compliant suppliers.

Suppliers acknowledge and agree to comply with this Code as a condition of doing business with Astra Microwave Products Limited.

Revision: 00

Date: 12.02.2026

A handwritten signature in black ink, appearing to read 'S Gurunatha Reddy', is positioned above the printed name.

(S GURUNATHA REDDY)

MANAGING DIRECTOR

Authorized Signatory

Astra Microwave Products Limited.

Corporate Headquarters

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