



BUSINESS CODE OF CONDUCT

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SKAPS Business Partner Code of Conduct v. 1



Message from the President

At SKAPS Industries, we believe that our commitment to ethical business practices, sustainability, and social responsibility is fundamental to our success and reputation. Our SKAPS Business Partner Code of Conduct embodies these values and establishes the standards we expect from all our suppliers and business partners worldwide.

We recognize the vital role our partners play in our supply chain, and we are committed to working with those who share our dedication to integrity, transparency, and respect for human rights. This Code of Conduct serves as a guide for responsible business conduct, ensuring that together we uphold the highest ethical standards and compliance with all applicable laws and regulations.

By adhering to this Code, our partners contribute not only to the strength and sustainability of our business but also to the well-being of the communities in which we operate. We value your partnership and count on your continued commitment to these principles as we strive to build a sustainable and trusted supply chain ecosystem.

Thank you for your support.

Sincerely,

Perry Vyas

**President
SKAPS Industries**



OUR FOUNDATION

At SKAPS Industry, operating safely and ethically has been our foundation since the company's inception. Our reputation is one of our most valuable assets and a critical reason customers, employees, and business partners continue to trust and support SKAPS. We care for each other's safety and well-being, communicate openly, take responsibility, empower and trust one another, and consistently deliver our best.

WHO MUST COMPLY

"SKAPS Partners" includes all entities and individuals who are engaged with SKAPS Industries in any business capacity such as:

- Supply products, equipment, materials, or services to SKAPS
- Act as agents, intermediaries, contractors, or subcontractors
- Represent SKAPS in any business capacity
- Provide consulting, advisory, or professional services
- Enter into joint ventures or partnerships with SKAPS

This Code applies to all SKAPS Partners, their employees, subcontractors, and agents engaged in providing goods or services to SKAPS under any contract, agreement, or arrangement.

COMPLIANCE

All SKAPS Partners must fully understand and comply with the requirements set forth in this Code of Conduct. They are expected to align their internal policies, management systems, and operational practices with the standards and values outlined herein. Partners must ensure effective communication and enforcement of this Code throughout their entire organization, extending these obligations to their supply chains, including sub-contractors and suppliers.

Compliance with all applicable laws and regulations in the jurisdictions where they operate is mandatory. SKAPS reserves the right to take appropriate action, including immediate suspension or termination of business relationships, should a Business Partner fail to meet these standards.

This commitment to compliance and ethical conduct is fundamental to maintaining a trustworthy, responsible, and sustainable partnership with SKAPS.



HUMAN RIGHTS & FORCED LABOR

Fundamental Human Rights Commitment

SKAPS is committed to upholding internationally recognized human rights standards. SKAPS Partners must demonstrate the same commitment and implement policies that protect and respect human rights throughout their operations and supply chains.

Strict Age Requirements

SKAPS Partners must strictly not employ workers under the age of 18 or the legal working age, whichever is higher in the country they operate in. To ensure compliance, Partners must implement robust age verification processes during hiring, utilizing appropriate and verifiable documentation such as government-issued identification. Accurate records of age verification and employment eligibility must be maintained. This commitment ensures the protection of minors from unlawful labor practices and aligns with international labor standards as well as applicable local laws.

Forced Labor and Modern Slavery Prohibition

SKAPS Partners must ensure that all work performed is voluntary, free from coercion or forced labor practices. Workers must have the right to freely terminate their employment with reasonable notice as determined by applicable laws or mutual agreement.

Upholding these principles is essential to maintaining ethical labor standards, protecting human rights, and ensuring the dignity and welfare of all workers within the supply chain. Where necessary employment contracts and agreements must be provided in the worker's native language to ensure full understanding and informed consent.

EQUAL EMPLOYMENT OPPORTUNITY AND NON-DISCRIMINATION

Workplace

SKAPS Partners must provide equal employment opportunities to all individuals irrespective of race, color, religion, sex, sexual orientation, gender identity, pregnancy status, age, national origin, disability, or protected veteran status. Hiring, promotion, compensation, and all other employment practices must be conducted fairly and without bias or discrimination. Partners are required to foster an inclusive workplace culture that actively prevents discrimination and harassment, ensuring that all employees are treated with dignity and respect. To promote awareness and legal compliance, Partners must prominently have Equal Employment Opportunity (EEO) policies at their workplace.



Anti-Harassment and Anti-Discrimination

SKAPS Partners must prohibit all forms of harassment, intimidation, and discrimination within their workplaces. A strict zero-tolerance policy on sexual harassment must be implemented and communicated clearly to all employees. Confidential and accessible reporting mechanisms must be established to encourage employees to report any complaints without fear. Prompt, thorough investigations and corrective actions are mandatory in response to all verified violations.

Furthermore, Partners must retaliate against any individual who, in good faith, reports concern or participates in investigations. Ensuring a safe, respectful, and inclusive workplace is essential to maintaining compliance and fostering employee trust and dignity.

FAIR WORKING CONDITIONS

SKAPS Partners must comply fully with all applicable wage laws, including paying at least the minimum wage or higher as mandated by local, state, or federal regulations. All legally required benefits such as social security, healthcare, and leave entitlements must be provided in accordance with the law. Overtime work must be fairly compensated based on applicable legal standards, and all payments to workers must be made regularly, accurately, and on time. Transparent payroll practices, including clear recordkeeping and communication of wage details, are essential to maintain trust and compliance.

Partners must adhere to all applicable laws governing working hours and overtime, ensuring that workers are not required or permitted to exceed legal limits. Mandatory rest periods and days off must be provided to promote worker health, well-being, and productivity. Full respect must be given to workers' rights to paid leave, including maternity, paternity, sick leave, and any other legally mandated leave entitlements. Accurate and transparent records of working hours, overtime, and leave taken must be maintained to ensure compliance and accountability.

HEALTH, SAFETY & ENVIRONMENTAL RESPONSIBILITY

Occupational Health and Safety

SKAPS Partners must provide comprehensive workplace safety training at all organizational levels to ensure that employees are knowledgeable about potential hazards, proper safety procedures, and emergency protocols. Training should be relevant, regularly updated, and designed to empower workers to perform their duties safely. Partners are also responsible for supplying appropriate Personal Protective Equipment (PPE) at no cost to employees where hazards are present. This equipment must meet or exceed applicable safety standards. Effective emergency response procedures, including evacuation plans, must be implemented, documented, and regularly reviewed. These measures are essential to fostering a culture of safety, preventing workplace incidents, and protecting the health and well-being of all workers.



Environmental Sustainability

SKAPS Partners must comply fully with all applicable environmental laws and regulations governing their operations. Partners must actively monitor and minimize their environmental impact by controlling air emissions, water consumption, and waste generation. Sustainable business practices that reduce environmental footprint are essential to align with SKAPS' commitment to corporate responsibility.

LEGAL COMPLIANCE & BUSINESS INTEGRITY

Zero Tolerance Policy on Bribery and Corruption

SKAPS Industries maintains a strict zero-tolerance approach toward all forms of bribery and corruption throughout its business operations. We are committed to conducting business with the highest level of integrity, fairness, and transparency.

All SKAPS Partners must:

- Prohibit all forms of bribery and corrupt practices, whether direct or indirect, including any payments or promises intended to improperly influence business decisions.
- Uphold the highest standards of ethical conduct in all dealings and promptly report any suspicious or questionable transactions to the appropriate compliance authorities.
- Fully cooperate with SKAPS in investigations relating to suspected bribery or corruption.
- Understand that violations of this policy will result in serious consequences, including immediate termination of business relationships, legal action, and potential reputational damage.
- Never offer, promise, give, or authorize payments or gifts to government officials, customers, or third parties to improperly influence outcomes.
- Refrain from making or accepting any illegal payments and avoid engaging in money laundering or other corrupt practices.
- Recognize that agreeing or promising to give or receive a bribe even without an actual exchange constitutes a violation.



Intellectual Property Protection

SKAPS Partners must respect and protect all intellectual property rights belonging to SKAPS, including trademarks, copyrights, trade secrets, patents, and proprietary information. The use of SKAPS' intellectual property is strictly limited to authorized purposes and requires prior written consent. Partners are required to implement safeguards to prevent misuse, unauthorized disclosure, or infringement of SKAPS' intellectual property. This includes protecting confidential information and proprietary data from unauthorized access or sharing.

Before utilizing any third-party intellectual property, partners must obtain proper authorization and ensure compliance with licensing terms. Any suspected or actual intellectual property violations must be reported promptly to SKAPS for prompt investigation and resolution. Full cooperation in intellectual property protection efforts, including enforcement actions, is expected to safeguard the integrity and value of SKAPS' intellectual property assets.

WHISTLE BLOWER POLICY

SKAPS Industries. is committed to maintaining the highest standards of ethics, transparency, and integrity in all aspects of its operations. The Company encourages employees, associates, and well-wishers to report in good faith any suspected misconduct, fraud, unethical behavior, or violation of the Code of Conduct without fear of retaliation.

All reports, referred to as "Protected Disclosures", will be treated with strict confidentiality and investigated fairly by the HR or the Management. Whistleblowers are protected from discrimination, victimization, or any adverse action resulting from their disclosure, provided such reports are made honestly and not with malicious intent.

The Company ensures that any verified unethical conduct will result in appropriate corrective or disciplinary action. Regular reviews and improvements of this policy are undertaken to ensure its continued effectiveness and alignment with legal and ethical standards.

MONITORING, REPORTING & COMPLIANCE

SKAPS Audit Rights

SKAPS reserves the right to conduct both announced and unannounced audits of Business Partner facilities and operations to verify compliance with this Code of Conduct. These audits may include a comprehensive review of policies, procedures, records, and other documentation related to adherence to the Code.

During audits, SKAPS or its authorized representatives may interview employees, management, and other relevant personnel concerning compliance matters. SKAPS may also engage qualified third-party auditors to perform independent assessment as necessary. If any deficiencies or non-compliance issues are identified, SKAPS will require the Business



Partner to develop and implement corrective action plans to address these findings promptly.

Reporting and Cooperation

SKAPS Partners must immediately report any suspected violations of this Code of Conduct. Full cooperation with SKAPS investigations is required, including maintaining confidentiality throughout the investigative process. Partners must provide SKAPS with access to relevant personnel, records, and documentation necessary for thorough compliance reviews. Prompt implementation of any corrective actions recommended by SKAPS is mandatory to address identified compliance issues.

Concerns or reports can be submitted confidentially via multiple channels:

- Email: contact@skaps.com