

Code of Business Conduct and Ethics

SENZAIT PRIVATE LIMITED (CIN U73100GJ2022PTC136935) · Version 1.0 · Effective 1 October 2026
· Approved by Mr. Vishalkumar Suthar, Director · Reviewed at least once a year

Why this code exists

SENZAIT is a small engineering company. Our work is trusted because the people who hire us can rely on what we say, what we measure and what we build. This code sets out how everyone who acts for SENZAIT is expected to behave, so that trust does not depend on who happens to be in the room.

It applies to every director, employee, trainee, contractor and agent of SENZAIT, in India and wherever we work for clients abroad. Where a client, supplier or partner works with us, we expect the same standards and say so in our contracts.

What we stand on

We obey the law, everywhere we work. That includes the Companies Act 2013, the Prevention of Corruption Act 1988, the Foreign Trade (Development and Regulation) Act 1992 and the Customs Act 1962 for our exports, the Foreign Exchange Management Act 1999 for payments across borders, the labour codes and the Factories Act 1948 for our workshop, and the environmental laws of India and Gujarat. When we work for a client in another country, we also respect the laws that reach that client, including anti-bribery laws such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.

We tell the truth. Test results are reported as measured, including the ones that disappoint. A design is described with its limits. A quotation says what it covers and what it does not. We do not overstate a capability to win work, and we do not hide a problem to keep it.

We keep what is confidential, confidential. A client's drawings, data, process details and commercial position are used only for the work they were given for, are protected while we hold them, and are not reused, published or shown to anyone else without written permission. That obligation continues after the work ends. We do not name clients on our website or in our marketing without their written consent.

We do not pay or accept bribes, in any form. Our Anti-Bribery and Anti-Corruption Policy sets out the rules in full, including for gifts, hospitality, agents and payments to any government office.

We avoid conflicts of interest and declare the ones we cannot avoid. Our Conflict of Interest Policy explains what to declare and how.

We compete fairly. We win work on the merits of our engineering. We do not agree prices or share bids with competitors, and we do not obtain a competitor's confidential information improperly.

We keep accurate records. Every payment, invoice, expense and test record is complete, accurate and kept for as long as the law and our clients require. No transaction is left off the books, and no record is altered after the fact.

We respect people. Nobody who works with us is discriminated against or harassed on grounds of sex, caste, religion, region, language, age, disability, marital status or any other ground the law protects. We comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. Every workplace we control is safe, as our Health, Safety and Environment Policy sets out.

We respect human rights in our own work and in what we buy. Our Human Rights and Modern Slavery Statement and our Supplier Code of Conduct set out what that means in practice.

We protect personal data. Our Data Protection Policy and Privacy Policy explain how.

We comply with trade controls. We check that what we export, and who we export it to, is permitted under Indian law and any sanctions India gives effect to, and we do not help anyone evade the trade controls that apply to them.

Speaking up

Anyone who sees, suspects or is asked to take part in conduct that breaks this code must raise it. The channel is the one in our Speak Up Policy: an email to info@senzait.com with the subject line "SPEAK UP", read by the Director. Nobody who raises a concern honestly will suffer for it, even if the concern turns out to be unfounded.

If this code is broken

A breach is a serious matter. For an employee it may lead to disciplinary action up to and including dismissal. For a contractor, agent or supplier it may lead to termination of the relationship. Where the law has been broken, we will cooperate with the authorities.

Responsibility

The Director is responsible for this code, for answering questions about it, for reviewing it at least once a year and for making sure every new joiner reads it. Questions go to info@senzait.com with the subject line "CODE OF CONDUCT".

Mr. Vishalkumar Suthar, Director · SENZAIT PRIVATE LIMITED · Gandhinagar, 1 October 2026