

BUSINESS PARTNER CODE OF CONDUCT

ShinzoX Group Limited ("ShinzoX")

1. Purpose

ShinzoX Group Limited ("ShinzoX") operates across healthcare, banking and financial services, information technology and digital services, global trade, spirits, logistics, and industrial equipment. Our business partners — suppliers, vendors, contractors, agents, and service providers — are integral to our ability to deliver value responsibly. This Business Partner Code of Conduct ("BPCOC") sets out the minimum standards of ethical, legal, and professional conduct that we expect from all our business partners throughout the course of our relationship.

2. Scope

This Code applies to all current and prospective business partners of ShinzoX Group and its subsidiaries, including but not limited to suppliers of goods and services, subcontractors, consultants, agents, distributors, and joint venture partners.

3. Integrity and Legal Compliance

3.1 Business Integrity

Business partners shall:

- Not engage in or facilitate bribery, corruption, kickbacks, or any improper payment to any person, including government officials
- Not offer any benefit to any employee or representative of ShinzoX to improperly influence any business decision
- Maintain accurate books and records and not engage in financial fraud or misrepresentation

3.2 Anti-Money Laundering

Business partners shall not engage in, facilitate, or turn a blind eye to money laundering or the financing of illegal activities. All financial transactions shall be conducted through legitimate channels and properly documented.

3.3 Conflict of Interest

Business partners shall promptly disclose to ShinzoX any actual or potential conflict of interest, including any relationship with current or former ShinzoX employees or directors that could influence business decisions.

4. Confidentiality and Data Protection

Business partners shall maintain strict confidentiality of all ShinzoX proprietary information, trade secrets, and data shared in the course of the business relationship. Business partners shall comply with applicable data protection and privacy laws and shall not use ShinzoX data for any purpose beyond the scope of the engagement.

5. Labour and Human Rights

Business partners shall:

- Not use forced, compulsory, or child labour in any form
- Provide fair wages, safe working conditions, and lawful hours of work
- Respect workers' rights to freedom of association and collective bargaining

Maintain a workplace free from harassment, discrimination, and abuse

6. Environmental Responsibility

Business partners shall comply with all applicable environmental laws and regulations, minimise waste and pollution, and support ShinzoX's commitment to environmental sustainability across its value chain.

7. Compliance and Enforcement

ShinzoX reserves the right to conduct due diligence, audits, or assessments of business partners to verify compliance with this Code. Failure to comply with this Code may result in termination of the business relationship and, where applicable, legal action.

8. Reporting

Business partners are encouraged to report any violation or suspected violation of this Code to: contact@shinzoX.com or to the Company Secretary, Vaibhav Pratap, at Ward No.7 Preet Nagar Chopan District, Sonbhadra - 231205, Uttar Pradesh, India.