

ANUPAM RASAYAN INDIA LTD.

SUPPLIER CODE OF CONDUCT

Dear Partners,

Greetings from Anupam Rasayan India Limited!!!

The objective of this Policy is to increase the consciousness with respect to sustainable business model and ethical work practices, among our valuable supplier like you who plays significant role in achieving our business objectives which leads to growth.

Being a conscious and responsible company, we always try to create, maintain and ensure a safe and clean environment along with business ethics which help us to create and maintain the safe and healthy workplace. Ensuring the principles of sustainable development in our supply chain is important to us.

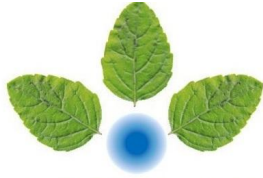
For consistent sustainable business approach, we would also like to develop our suppliers and help them to create the vision for ethical and sustainable business. With this, we would like you to please adhere with our Supplier code of conduct or you can develop and follow your own Supplier code of Conduct covering all the aspects of sustainable as well as ethical business practices.

Your commitment towards these principles will help us creating the sustainable business relations in long run and further strengthen our vision to establish sustainability which further help us to grow together.

We thank you for your continuous support and services which you are providing to us and to further strengthening of business, we seek your cooperation and request you to provide the details mentioned on following page on your company letter head and support us in creating, maintaining and ensuring the sustainable and ethical practices and business relations in long run. We have attached Company's Policy and Supplier Code of Conduct for your kind reference.

Yours's Partner in growth,

Anupam Rasayan India Limited



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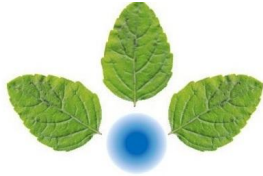
SUSTAINABLE PROCUREMENT POLICY

Anupam Rasayan India Limited (“Company”) has always promoted high ethical standards of professional and personal conduct by our team members and business associates. All of our team members and business associates must be committed to integrity in all aspects of their activities and comply with our values and vision; and raise the sustainability standards in our supply chain.

Company is conscious of its responsibility towards creating, maintaining and ensuring a safe and clean environment, through the application of efficient technologies and maintaining safe work practices for sustainable development. Ensuring the principles of sustainable development in our supply chain is important to us.

To enhance our sustainable procurement journey, we intend to do the following:

- Promote awareness about Sustainable Procurement amongst contractors and suppliers
- Identify and address ESG and business sustainability risks and opportunities.
- Develop Management systems for sustainability, energy, quality, environment, occupational health and safety and social accountability progressively.
- Integrate sustainable procurement requirements in the organization’s roles, responsibilities, authorities and accountabilities with respect to sustainable procurement. This shall be done for top management of purchasing function, strategic sourcing, new supplier-part development, supply chain management, supplier performance development, contractors management, projects/ capital buying, vendor performance monitoring and Recognition and rewards.
- Monitor and evaluate sustainable procurement performance and identify continual improvement opportunities.
- Reduce Carbon footprint by conservation of materials, water, energy, using waste to wealth / waste to energy approach and adopting more renewable energy in order to achieve Net zero as a part of Climate change mitigation and adaption.
- Encourage logistics optimization and reduce waste by Reduce, Reuse, recycle approach.



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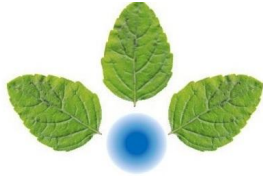
- Enhance bio-diversity within the facilities.
- Promote supplier parks and suppliers siting near the plant locations.
- Encourage suppliers to develop their own sustainability goals and annual sustainability reports.
- Facilitate rewards and recognition.
- Establish Sustainable procurement objectives and targets.
- Support our suppliers through resource competence, building awareness and communication, etc.
- Procure more energy efficient products by defining specifications keeping these aspects in mind.
- Co-create innovation for win-win situation for both suppliers and Company.
- Develop a supplier complaint handling mechanism.

The Company acknowledge that long-term sustainable development of our suppliers is critical to our joint success and we value our relationship with suppliers who share the same approach and vision towards doing business. In line with our commitment, we have developed this Policy which is an extension of our values and is applicable to all our suppliers. We expect our suppliers to operate in accordance with the principles as outlined in this Policy and adhere to all applicable laws and regulations.

This Policy/Code of Conduct outlines our expectations with regards to ethics, business integrity, human rights, health and safety, environment, the local community and quality of product and operations.

BUSINESS INTEGRITY AND ETHICS

- **Conflict of interest:** Suppliers are expected to report any conflict of interest in any business dealings with Company that supplier is aware of to allow us the opportunity to take appropriate action. It should be disclosed if any Company employee or professional under contract with Company may have significant ownership or interest in a supplier's business.
- **Bribery, corruption, gifts and donations:** Suppliers in all commercial dealings with Company or otherwise must not receive or offer to make any illegal payments, gifts, bribes, donations or other



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improper advantage in order to obtain unethical favours for the business. All suppliers must ensure that no action is taken to violate any applicable anti-bribery or anti-corruption laws and regulations in the locations of their operations and make every effort to eliminate all forms of corruption and bribery.

- **POTENTIAL RISK SCENARIOS: RED FLAGS**

According to several anti-bribery and corruption laws, a list of potential red flags that may emerge when employees are employed by companies, associations of Associates, or business partners with ARIL entities and cause concern is listed below. The list is provided mainly for illustrative reasons and is not meant to be comprehensive.

If any Associate or Business Partner encounters any of these red flags while working with the ARIL, they must report them promptly using the procedure set out in our "Whistle Blower Policy":

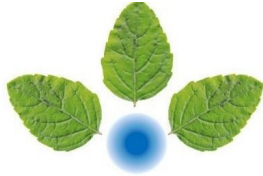
- a. You become informed that a third party is involved in or has faced allegations of participating in unethical or inappropriate business activities;
- b. You discover that a third party has a reputation for receiving bribes or requesting bribes to be paid to them, or that they have a "special relationship" with foreign government officials;
- c. a third party insists on getting a commission or fee payment before signing a contract with us or performing a government function or operation for us;
- d. When a third-party requests cash payment and either refuses to sign a formal commission or fee agreement or fails to deliver an invoice or receipt for a payment made, the situation is considered a breach of contract.
- e. A third party asks for payment to be sent to a location or country that is not their place of residence or business operations.
- f. a third party asks to "facilitate" a service by demanding an unforeseen extra charge or commission;



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- g. a third party expects expensive entertainment or gifts before beginning or continuing contractual discussions or service fulfilment;
 - h. a third party demands cash to "overlook" any legal infractions
 - i. A request from a third party that you offer employment or any other benefit to a friend or family;
 - j. You receive a non-standard or customised invoice from a third party.
 - k. A third party firmly advocates for the utilization of side letters or declines to formalize the agreed-upon terms in writing.
 - l. You have noticed that we have been charged for a commission or fee payment that looks to be substantial in comparison to the service alleged to have been performed.
 - m. a third party demands or needs the use of an agent, intermediary, consultant, distributor, or supplier who is not commonly utilised or known to us; or
 - n. A third party offers you an extremely large present or luxurious hospitality.
 - o. A foreign government official implies that making a donation to their preferred charitable organization could grant you the ability to influence the process of license approvals.
 - p. Violations of environmental regulations, such as improper disposal of hazardous waste or emissions exceeding permissible levels, can lead to serious legal and reputational consequences.
 - q. Non-compliance with local, national, or international regulations and standards governing chemical manufacturing and handling can be a major concern.
 - r. Failure to report accidents or incidents promptly and accurately may indicate a lack of transparency.
 - s. You observe quality control issues which are consistent problems with product quality, purity, or consistency.
- **Confidentiality:** Suppliers shall safeguard and respect Company's intellectual property; trade secrets and other confidential, proprietary and sensitive information or data at all times and shall



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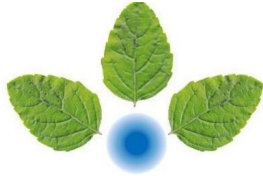
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not disclose the same. The information provided by Company shall be used only for its intended and designated purpose as decided and agreed upon between Company and the supplier.

- **Anti-competitive and restrictive trade practices:** In order to encourage open and transparent business operations suppliers must abide by all relevant national and international regulations.

HUMAN RIGHTS

- **Forced and child labour:** Suppliers will not employ any person below the age of 18 (or as per local law, whichever is greater) and supplier should prohibit use of child labour at any stage of their business process. The use of forced labour including prison or debt bondage labour, human trafficking or modern-day slavery should not be entertained by the suppliers.
- **Compensation and working hours:** The mandatory industry standards and regulations pertaining to minimum wages, overtime pay, working hours and rest periods, must be followed by suppliers.
- **Non-discrimination:** Suppliers must ensure that there should not be any discrimination in their hiring and employment practices based on race, colour, gender, age, nationality, religion, sexual orientation, marital status, citizenship, disability, veteran status, medical condition etc.
- **Supplier Obligation:** The Suppliers are obliged to work with the Company's staff, act within its own authority and abide by directives by the Company and implementation activities.
- **Civil and Political Rights:** Suppliers should follow international standards on human rights and working conditions help form the basis of this Code, such as the United Nation's Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO) (especially ILO Convention 29, 87, 98, 100, 105, 111, 138 and 182), Protocol of June 11, 2014 to Convention No. 29, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights.



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GOVERNANCE

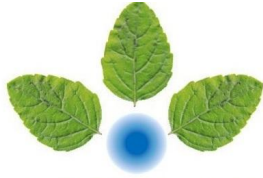
- Suppliers must comply with all applicable laws and regulations within the country of operation. All other applicable international laws and regulations should also be complied with. Suppliers should follow guidelines of all the required permits and registrations to be always legally compliant.
- Not to indulge in any form of money laundering activities.

ACCOUNTABILITY AND TRANSPARENCY

- **Maintaining appropriate financial records:** We expect suppliers to prepare and maintain accounts of business dealings fairly, accurately and in accordance with accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country of operation.
- **Wealth and income creation:** The Supplier shall comply with the tax laws and regulations of the country where they operate to promote responsible wealth and income distribution, prevent exploitation of workers, and encourage sustainable economic growth

PRODUCT AND SERVICES

In today's world, one must deliver his product with quality consistently and persistently to sustain the competition in the market. To achieve the same, we expect our suppliers to implement quality management systems like ISO which help them to establish quality objectives, policies, manual, procedures and help them to develop robust Quality Management System which they can maintain through periodic management reviews and internal and external audits. These will also help them to comply with local laws and regulation.



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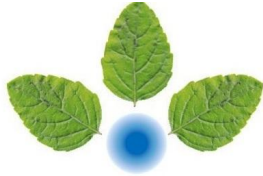
- High quality in the products and the services supplied meeting our specifications, applicable standards, and compliance with all the applicable laws (including product packaging, labelling, after-sales service obligations).
- Suppliers are expected to ensure that products supplied to Company, do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

CORPORATE SOCIAL RESPONSIBILITY

To be Sustainable in long run, one must fulfil the responsibility towards society and local community in general. At Company, we are following the same and complying with CSR policies developed internally and expect the same from our suppliers.

RESPONSIBLE CONDUCT WITH STAKEHOLDERS

- **Fair dealing with vendors/suppliers:** We encourage all of our suppliers to treat their business partners fairly and transparently during business transactions, particularly in the areas of fair appraisal, appropriate selection, equitable opportunity, fair and open competition for everyone.
- **Diversity in workforce:** Suppliers should take initiatives to have a diverse and inclusive workforce in terms of age, gender, experience, ethnicity etc.
- **Engage and involve local communities:** We encourage our suppliers to deal with the concerns of the community affected by their business operations and further work towards the mitigation of the impact.



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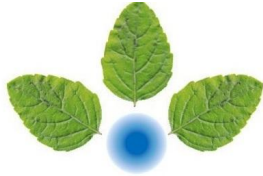
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ENVIRONMENT, OCCUPATIONAL HEALTH AND SAFETY

- Ensure and encourage safe and environment friendly ways of development, manufacture, transport, use and disposal of products having minimum impact on communities including biodiversity, climate change and water scarcity and compliance with all the applicable environmental, health and safety laws and regulations.
- Suppliers will protect their employees from the Risks and Hazards arising from their business activities in the workplace. We expect our suppliers to adopt robust and relevant management practices to comply with applicable health and safety laws, rules, regulations and industry standards. The suppliers are also encouraged to conduct training and awareness activities for employees on health and safety. We also suggest suppliers to take reasonable actions to prevent accident and injuries by analysing and minimizing risk exposure.
- Suppliers should conserve the natural resources by utilizing in efficient way.

LOCAL COMMUNITY DEVELOPMENT

Being a conscious and responsible Company, we understand that our operations affect our communities along with those who are in contact of our supply chains and our suppliers. Therefore, to mitigate the impacts by our suppliers on community, we expect from our suppliers that they should undertake steps to collaborate and associate with the local community for economic and social development by providing employment, eradicating poverty, developing skills of local people etc. wherever relevant.

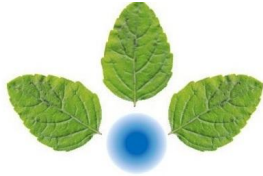


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GREEN FUTURE

- Company has established Green Purchasing Policy and Environmental Targets to promote efforts to purchase environmentally conscious materials and products.
 - Company is completely aware of the critical role green purchasing plays in forming a market for environmentally oriented products and how extremely effective green purchasing is in creating a sustainable society. Based on the guidelines described below and in collaboration with the relevant associates, we are making efforts to promote green purchasing when procuring materials.
1. The conditions described below shall be taken into consideration when procuring materials.
 - a. Substances harmful to the environment or health are contained.
 - b. Consumption of raw materials or energy is minimal.
 - c. Sustainable raw materials are used.
 - d. It is possible to recycle the material or use the material for a longer period than the previously used material.
 - e. When discarding the product, it is easy to process, treat, or dispose of.
 - f. Usage of renewable energy.
 - g. Usage of packing material with minimal environment impact while designing, usage or disposal



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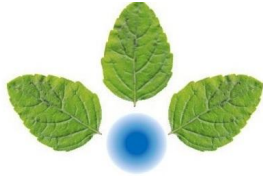
Mutual trust and respect are the foundation pillars of our relationship. You may also demonstrate your commitment to these principles through compliance with either your code of conduct or by giving consent to above mentioned principles. However, Anupam may request for verification of your compliance with these standards by any of the following methods and to take corrective action if there is any reason for concern:

Self-Assessment: We may ask you to fill in a questionnaire on compliance with these standards, which will be considered as a part of report to understand employment and employment relationship, condition of work and social protection.

Third-Party Assessments: We may ask desktop information from a third party, e.g. a data provider, on your compliance and performance concerning these standards

Certification Statements: We may ask you for certification or statement confirming compliance with these standards.

On-Site Audits: We or an authorized third party acting on our behalf may contact you and ask for permission to verify compliance with these standards on site.



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I hereby Agree/Disagree to follow the above principles and integrating the same within our organizations

Agree Disagree

Supplier Company Name

Registered Office Address

Manufacturing Site Address (if Applicable)

Product/Services offering:

Sign / Date:

Company Stamp

Supplier Representative Name:

Designation:

Email ID