



## **Tatva Chintan Code of conduct for Supply Chain Partner**

This Code of Conduct defines the basic requirements placed on the suppliers and third-party intermediaries of the Tatva Chintan Pharma Chem Limited (hereinafter may be referred as “The Company” or “TCPCL” or “Tatva Chintan”) concerning their responsibilities towards their stakeholders and the environment.

### **Purpose of this Document**

The Purpose of this document is to define the minimum standards that all of Tatva Chintan’s supply chain partners are required to follow. The supply chain partners (hereinafter collectively called Vendors) include, but are not limited to:

1. Vendors, suppliers
2. Sub-contractors,
3. Labour contractors,
4. Site contractors
5. Engineering sub-contractors etc.

Each vendor is required to act responsibly and with integrity and honesty, and to comply with this code and its underlying principles, policies and instructions. By signing on a copy of this Code of Conduct, the respective Vendor commits itself to total compliance with this Code of Conduct in letter and spirit.

### **Legal Compliance**

Comply with the laws and regulations of the applicable legal systems.

### **Business Ethics**

Suppliers are expected to, conduct their business in an ethical manner and to act with integrity. Ethical requirements include the following aspects,

#### **Business Integrity**

- Suppliers are expected not to practice or tolerate any form of corruption, extortion or fraud. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers are expected not to offer Tatva Chintan employee’s gifts or any other kind of personal benefit resulting from the relationships with the suppliers.

#### **Fair Competition**

- Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

#### Identification of Concerns

- Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed.

#### Privacy & Intellectual Property

- Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

#### Animal Welfare

- If applicable to the suppliers' industry, animal testing will be minimized and alternatives will be used whenever possible, scientifically valid and acceptable to regulators.

### **Human Rights and Labour Practices**

Suppliers shall support and respect the protection of internationally proclaimed human rights and must not be complicit in any form of human rights abuse.

#### Prohibition of Forced Labour

- Neither use nor contribute to slavery, servitude, forced or compulsory labour and human trafficking.

#### Prohibition of Child Labour

- Not tolerate or use child labour in any stage of your activities other than in accordance with all applicable laws and regulations. No persons may be employed or engaged in any work if they are below the legal working age. Furthermore, no child be engaged in any form of work that could be harmful to his/her health, moral or social development, even if the applicable legal working age is below 18.

#### Non-Discrimination and Respect for Employees

- Promote equal opportunities and treatment of employees, irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### Working Hours, Wages and Benefits for Employees

- Adhere to all applicable working-hours regulations.
- Pay fair wages for labour and adhere to all applicable wage and compensation laws.
- Provide rest days and ensure that any overtime is properly documented and compensated.
- Compensate workers in a way that meets or exceeds minimum local standards and in an amount that is sufficient to meet basic human needs in the applicable community.
- Legally permit allow workers to freely associate with others, form, and join organisations of their choice, and bargain collectively.

### Health and Safety of Employees

- Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
- Provide training to ensure employees are educated in health and safety issues.
- Establish a reasonable occupational health and safety management system.
- No persons may be employed or engaged in any work if they are below the legal working age. Furthermore, Tatva Chintan requires that no child be engaged in any form of work that could be harmful to his/her health, moral or social development, even if the applicable legal working age is below 18.

### Grievance Mechanism

- Provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct.

## **Environment, Health, Safety & Quality**

Suppliers are expected to provide a safe and healthy working environment and to operate in an environmentally responsible and efficient manner. Suppliers will integrate quality into their business processes. This comprises the following aspects,

### Quality Requirements

- Suppliers will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Tatva Chintan's needs, perform as warranted and are safe for their intended use.

### QHSE Regulations

- Suppliers will comply with all applicable quality, health, safety and environmental regulations. All required permits, licenses and registrations will be obtained, maintained and kept up-to-date. Suppliers will fulfill their operational and reporting requirements.

### Product Safety

- Material safety data sheets containing all necessary safety-relevant information will be made available by suppliers for all hazardous substances and will be provided to Tatva Chintan if required.

### Occupational Health and Safety

- Suppliers will protect their employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees. Suppliers will provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace.
- When engineering & other systems are not adequate to control hazards, then suppliers will provide employees with appropriate personal protective equipment. Safety information relating to hazardous materials<sup>3</sup> – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment also includes as a minimum potable drinking water, adequate lighting, temperature, ventilation and sanitation.

### Process Safety

- Suppliers will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process. For hazardous installations the supplier will conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

### Environment and sustainability

- Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Adverse impacts on the environment and climate will be minimized or eliminated at their source or by practices such as the process change, maintenance and facility processes, material substitution, conservation, recycling and material reutilization. Suppliers will engage in the development and

use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

- Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be properly managed, measured, controlled and handled prior to release of any substance into the environment. Suppliers will have systems in place to prevent or mitigate accidental spills and releases into the environment.

#### Security

- Supplier will have good security practices across their supply chains. Supplier will maintain processes and standards that are designed to assure the integrity of each shipment supplied to Tatva Chintan or its final destination and all points in between and for that supplier will take all the adequate & necessary measure.

### Fair Operating Practices

#### Anti-Corruption and Bribery

Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

#### Fair Competition, Anti-Trust Laws and Intellectual Property Rights

Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

Respect the intellectual property rights of others.

#### Conflicts of Interest

Avoid and/or disclose internally and to Tatva Chintan all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.

#### Anti-Money Laundering, Terrorism Financing

Not directly or indirectly facilitate money laundering.

### Data Privacy

Process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

### Responsible Minerals Sourcing

Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict- Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

### Right to audit and termination

Tatva Chintan reserves the right to verify that Suppliers are in compliance with this Supplier Code through assessments and/or audits, where third parties may be used.

Tatva Chintan reserves the right to immediately terminate any and all agreements with a Supplier found to be in violation of any applicable law, or in material breach of any of the requirements of the Supplier Code, without incurring any liability towards the Supplier.

### Confidentiality

Reporting and/or inspections shall be done in such a manner as to avoid unrestricted disclosure of Supplier's confidential information, including where Tatva Chintan uses third parties.

### Obligations

The obligations under this Supplier Code are in addition to the Suppliers' other obligations pursuant to any purchase or other agreement in place between Tatva Chintan and the Supplier. These obligations shall continue in force in respect of any deliveries from the Supplier to Tatva Chintan, regardless of the termination or expiry of any purchase or other agreement between the parties.