



## Supplier Code of Conduct Policy

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Indore Composite P. Ltd. (ICPL) always take pride on being a reputable and honest business and are committed to upholding high ethical and professional standards in everything we do, consistent with our Values and Employee Code of Conduct. In turn, we recognise the important relationship between Indore Composite Group and our suppliers in achieving high performance across our business.

**Objective** - A supplier code of conduct is created for the purpose of ensuring that a company's suppliers adhere to high standards of safe working conditions, Sustainability, fair and respectful treatment of employees, and ethical practices.

We view the suppliers as an extension of our own teams, and so the work you do and the manner in which you conduct your business practices will naturally reflect upon us. Thus, it is important to that our suppliers also identify and are committed to meeting our standards, as we believe they form the cornerstone of good business practice. They reflect aspects of business conduct and reflect how we would expect to treat suppliers and in turn be treated ourselves.

We ICPL, focused on the wide angled view in the direction of sustainability of business relationship. We are majorly focused on the sustainability of Environment, Workplace and personal safety, Integrity, Ethics, Anti-Competitive practices, Gifts and hospitality, Regulatory Compliance, Fair Competitive Practices, Conflicts of Interest, no human rights abuse and No Child and Forced Labour etc.

### Guidelines -

All personnel of suppliers shall observe and implement the code of conduct in their official day to day activities.

**Environmental Protection** –The supplier must comply with all applicable environmental/pollution control laws and regulations. We seek continuous improvement in the reduction of our adverse impact on the environment and expect our suppliers to support efficiency programmes and opportunities to help meet this aim. This includes the reduction in consumption of non-renewable energy forms and the encouragement of recycling where possible.

**Workplace and personal safety** - The supplier shall strive to provide a safe and healthy working environment and comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical, and structural safety. The supplier should have strict procedures that prevents the use of illegal drugs or alcohol in the factory premises. The supplier must inform any reportable accident(s) to ICPL immediately which may affect delivery schedule to ICPL and corrective action to be taken to avoid such accident(s) in future.

**Ethics** – All personnel of the supplier shall deal on behalf of their company with professionalism, honesty and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent.

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**Anti-Competitive practices** - Competition and anti-trust legislation prohibit business practices that conflict with the principles of free and fair competition and help to uphold fair and ethical business practices. Cartel is the most obvious form of anti-competitive behaviour and is strictly not acceptable. Agreements that fix market prices or other market conditions such as discounts, commissions, or rebates, or that limit or share control of markets or technical development and/or sources of supply are equally unacceptable. ICPL is committed to fair, free, and open competition, and strictly prohibits suppliers from engaging in anti-competitive practices. If you have reason to suspect anti-competitive activities, you should report it.

**Regulatory Compliance-** The supplier must follow all applicable laws regarding working hours, wages and overtime pay. Workers will be paid as per the legal laws applicable. The supplier must pay overtime and any incentive rates that meet all legal requirements or the local industry standard. Workers should receive necessary time off, paid annual leaves and holidays as required by local laws.

**Accounting and Reporting** - All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

**Tax Law Compliance** - The supplier shall comply with the tax laws and regulations of country in which it operates. Where tax laws do not give clear guidance, prudence and transparency shall be the guiding principle.

**Marketing and Sales** - The supplier shall not make false statements, commitments or provide misleading information regarding its products or their performance, including the safety and environmental attributes of the products.

**Fair Competitive Practices-** Supplier shall compete with other suppliers in a fair manner and with integrity. Supplier shall not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that improperly influences the marketplace or outcome of a bidding/negotiation process.

**Conflicts of Interest-** The duty of all personnel of supplier towards the ICPL demands that he or she avoids and discloses actual and potential conflicts of interest. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the ICPL. If a supplier is considering investing in any customer, supplier, developer or competitor of the ICPL, he or she must first take care to ensure that these investments do not compromise on their responsibilities towards ICPL. The ICPL's policy requires that information to be given while making such an investment.

Notwithstanding that conflict of interest exist due to any historical reasons, adequate and full disclosure by the supplier should be made to the ICPL's management.

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**No Child and Forced Labour-** The supplier shall not hire any person less than 18 years of age. Also, supplier must not use involuntary labour of any kind, including prison labour, debt bondage or forced labour. Additional standards include the following:

- a) A supplier must comply with all applicable child labour laws, including those related to hiring, wages, hours worked, overtime and working condition.
- b) The supplier must maintain official documentation that verifies a worker's date of birth, employment and training history. ICPL reserves the right to review this information whenever required.

**No Political Involvement.** - Supplier shall observe neutrality with regards to political parties and candidates for public office. Supplier shall refrain from using their assets for promoting interests of political parties or candidates for public office.

**Human Rights** – The supplier shall support and respect the protection of internationally proclaimed human rights and make sure the company is not complicit in human rights abuses. Suppliers must have in place policies and processes recognising, respecting, and protecting the human rights of their employees, supply chain, stakeholders, and communities within which they operate.

**Diversity, equality, and inclusion** - The supplier shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, nationality, and disability. Employees of the Supplier shall be treated with dignity and in accordance with maintaining a work environment free of sexual harassment, whether physical, verbal, or psychological.

**Confidential information** – The assets of the ICPL shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, and resources as well as intangible assets such as Intellectual Property Rights, Knowhow & Technology, proprietary information, relationships with customers and suppliers, etc. The supplier must maintain physical and electronic security for all confidential information. Supplier's employees should use extreme care in protecting confidential or proprietary information of any kind. Face-face discussions should be conducted in a secure location. If confidential information to be discussed or exchanged between ICPL and the supplier, or the supplier and a Third Party, the parties must first ensure that a confidentiality or Non-Disclosure Agreement has been signed and is being complied with.

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**Data Protection and Information Security** - As part of the services you provide to us, you may be required to process the personal data of clients, candidates, and employees. Where this is the case, we expect that you will respect individuals' rights to privacy and process personal data in compliance with all applicable data protection and information security laws, and in accordance with accepted industry standards and our instructions. All suppliers are required to (a) treat personal data as strictly confidential, (b) not use it for any purposes other than to provide services to us, and (c) implement and maintain appropriate technical and organisational security measures to protect personal data against loss, unauthorised access, destruction, use, modification, and disclosure.

**Gifts & Donations** - The supplier shall not (directly or indirectly) offer any significant gift, entertainment, trip, discount, service, or other benefit from his organization to any official of ICPL which would or reasonably appear to be capable of influencing such person to act in a manner which is against the interest of the ICPL.

**Anti Bribery and Corruption** - Under no circumstances bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or for any individual is acceptable and it will be treated with zero tolerance policy. We therefore expect our suppliers to conduct business in an ethical and responsible manner,

**Information on violation and corrective action** - ICPL expects its suppliers to comply with the conditions of the Supplier Code of Conduct. If ICPL determines that a supplier has violated this code, the supplier must provide information relating to the incident(s) and show within 30 days the action taken to correct the condition. ICPL may follow up to make sure the condition has been corrected.

**Right to Audit**- ICPL reserves the right to conduct a full audit if necessary to ensure compliance of Supplier Code of Conduct.

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