

Supplier code of conduct

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Message from Chief Procurement Officer



With sustainability at its core, we, at UltraTech take great pride in our business practices. We are commitment towards integrity both at work and in the way we conduct our business. We seek to pursue a mutually beneficial business relationship with all our suppliers. We pledge to work with companies which are committed to walk with us on our sustainability journey. In all our business dealings with our stakeholders, we want human rights as the top priority.

The supplier code of conduct is based on ABG's Code of Conduct as well as the principles laid down by United Nations Global Compact (UNGC) and International Labour Organisation (ILO). The Code of Conduct governs all our values and principles we are working to upkeep. We seek your cooperation in upholding the Code of Conduct in all our commercial/business interactions and across the supply chain. Together we can foster a diverse, ethical, and responsible supply chain.

Sathia Raj

Chief Procurement Officer

Message from Chief Technical Officer



At UltraTech, our deeply ingrained values drive the way we do business and guide the way we live by them each day. We are commitment towards contributing in building a safe , responsible and sustainable country and world. This principle guides us in conducting our business in an ethical and honest manner.

Our suppliers are vital in way we conduct our business and deliver value to our stakeholders. As responsible a corporate, we intent to continuously work with our suppliers who share a similar commitment to responsible & similar sustainable business practices.

Through this Supplier Code of Conduct, we share our standards that we expect our suppliers to follow and encourage them to implement them throughout their supply chain as well, while conducting business in an ethical, social and environmentally responsible manner.

These requirements are based on the United Nations Universal Declaration of Human Rights and the core labour conventions of the International Labour Organisation (ILO).

As a valued supplier of UltraTech, I believe in your commitment and support to continuously adopt and promote responsible business practices and go beyond the laid down norms.

Raju Goyal

Chief Technical Officer

Scope of Application

The provisions of this Code of Conduct shall be applicable to all Tier-1 suppliers supplying various categories of goods and services. Tier-1 suppliers include suppliers, agents, service providers, dealers and distributors, who have direct business relations with UltraTech. The term suppliers used herein shall mean and include Tier-1 suppliers as defined above.

The provisions as set forth in this Code of Conduct provide the minimum standards expected of suppliers. It is desirable that the suppliers should strive to exceed both international and industry best practices. It is also expected that the suppliers encourage and work with their own suppliers and sub-contractors to ensure that they also strive to meet the principles of this Code of Conduct. We understand that reaching some of the standards established in this Code of Conduct is dynamic rather than static process and we encourage suppliers to continually improve their workplace conditions accordingly.

Management Monitoring and Evaluation

It is expected that suppliers, at a minimum, should establish clear goals towards meeting the standards set forth in this Code of Conduct. We expect that our suppliers will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor, and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Suppliers are encouraged to operationalize UNGC principles and to communicate their progress annually to their stakeholders. Suppliers are also encouraged to have sustainable procurement policy in turn for their own suppliers.

Supplier Code of Conduct

Suppliers shall ensure compliance with applicable local laws and regulations and the Code. Suppliers shall establish a process to identify the applicable regulations related to the supplier code of conduct and to track any amendments or updates to these regulations that may impact their compliance with the code. Suppliers shall identify all relevant compliance obligations related to sustainability issues, including laws, regulations, permits, agreements, and commitments. They should also consider laws and regulations in countries where products be sold and adhere to relevant international standards and commitments appropriately.

The compliance requirements may include, but are not limited to, the following as applicable:

- Laws and regulations (federal, state and local)
- Permits, licenses or other forms of authorization
- Orders, rules or guidance issued by regulatory agencies
- Judgments of courts or administrative tribunals
- Treaties, conventions and protocols

If any part of this Code conflicts with local laws in any location, the more stringent standard between the Code and the local law shall be applicable.

The Code has 5 subsections that the supplier is expected to conform to and is also expected to apply the same in their supply chain as well:

1. Human Rights & Labour Rights

a. Forced Labour & Human Trafficking

- i. Supplier should not engage in or benefit from, in any manner whatsoever, forced or compulsory labour. Any labour without free consent including but not limited to unpaid or indentured servitude (Indentured servitude is a labour contract where an individual will work to repay an indenture or loan over some time, commonly several years),

labour under abuse or threats of physical abuse or otherwise, or labour under any form of harassment would be deemed as forced labour.

- ii. Supplier shall not engage in any manner whatsoever with any entity that practices or is known to practice forced labour as defined above.
- iii. Supplier shall ensure that employees, workers, contractors or subcontractors across its supply chain are not subjected to arbitrary harassment measures such as confiscation of passport, withholding of wages or unreasonable penalties.
- iv. Supplier should provide training to all its employee, contractors and subcontractors in their local languages to raise awareness of issues of forced labour and encourage reporting of violations to the relevant government authorities, the respective Supplier and UltraTech.

b. Child Labour

- v. Suppliers are strictly prohibited from benefiting from or utilizing in any manner, including as employees, contractor or subcontractor, child labour that is in violation of the local laws and regulations.
- vi. Irrespective of the local regulations, Suppliers are not permitted to utilize or engage children below the age of 16 or legal minimum age for employment.
- vii. Workers below the age of 18 or legal minimum age of employment are not permitted to undertake any work that is mentally, socially, physically, morally harmful or any work that could interfere with their schooling needs.
- viii. Supplier shall be responsible for ensuring compliance with child labour laws across its associated stakeholders. Supplier shall formulate and circulate relevant policies to raise awareness for child labour and encourage reporting of violations to the relevant government authorities, the respective Suppliers and the Company.
- ix. The Supplier must take immediate action to remove any children found performing labor in its supply chain and ensure they have access to education.

c. Anti-Discrimination & Humane Treatment

- i. Suppliers shall ensure that Employees and workers are not discriminated based on race, nationality, regionality, affinity, colour, religion, caste, creed, affiliation, gender, sexual preferences, age, physical ability, political preferences, pregnancy, marital status or family status.
- ii. Suppliers must ensure fair and non-discriminatory practice in all aspects including hiring, promotions, assignments, wage hikes, training, and termination. Suppliers shall ensure that its workers, contractors, and applicants are not subject to arbitrary and discriminatory medical tests like HIV test, genetic tests, pregnancy test or tests that may be used to determine a person's mental health status.
- iii. Suppliers are expected to treat their workers, contractors, and applicants with dignity and respect. They must not be subjected to any form of or threat of physical, psychological, sexual, or verbal harassment.
- iv. Suppliers shall ensure workers, contractors and applicants are provided with a safe and healthy working environment.
- v. Suppliers should avoid imposing arbitrary or dehumanizing sanctions on workers, contractors, or employees, including denying them access to basic necessities like drinking water, public facilities, and common areas such as restrooms during their breaks or leisure time.
- vi. Suppliers shall formulate, communicate, and establish rules and standard for workplace behaviour and humane treatment of their employees and their supply chain based on accepted international, national, or industry standards. Any violation of the rules and standard should attract appropriate disciplinary action and sanctions.
- vii. Suppliers shall proactively initiate diversity initiatives and take measures to improve inclusivity at the workplace.

- viii. Suppliers shall avoid procuring or sourcing from vendors and/or areas known to be associated with any human rights violation.

d. Working Hours, Wages & Benefits

- i. Suppliers shall ensure compliance with applicable minimum wage regulations and working hours regulations across their supply chain.
- ii. Suppliers shall ensure proper communication of wages, benefits, wage schedule, overtime wage and working hours with appropriate documentation to their employees, contractors, and subcontractors.
- iii. Suppliers shall ensure adherence to working hours and timely payment of overtime wages whenever appropriate. Overtime should be voluntary, and the worker should not face retaliation for refusal to do overtime work.
- iv. Suppliers are required to allow their workers adequate rest. Workers are entitled to a minimum of 24 consecutive hours per week as rest.
- v. Suppliers shall not withhold or deduct wages for any reason, including disciplinary actions or recruitment fees, unless it is required by law, or the worker gives their express written consent.
- vi. Suppliers shall provide workers with transparent employment records including attendance and payroll records.
- vii. Suppliers should formulate and communicate a long-term compensation for their workers that specifies the expected growth in wages and benefits growth.

e. Freedom of Speech, Association & Collective Bargaining

- i. Suppliers shall ensure that every worker is entitled to their free speech to the extent permitted by law.
- ii. Unless restricted by law, Suppliers must allow workers to exercise freedom of association and collective bargaining for occupational interests including the right to form, join and/or refuse to join associations, unions, or organizations.
- iii. Suppliers shall not interfere or influence, including through incentives, sanctions or discrimination, decisions of employee/s or their associations.
- iv. Suppliers shall ensure that workers do not face retaliation for reasonable expression of their beliefs or opinions.
- v. Suppliers must prevent and protect employees from being targeted or discriminated against for exercising their freedom of association.
- vi. Suppliers shall establish a process for grievance redressal to resolve disputes, internal complaints and ensure transparent communication amongst employees, their representatives, and the management. Suppliers should ensure that employees are provided with appropriate protection through measures like anonymity while raising concerns.
- vii. Suppliers should pro-actively promote and facilitate exercise of collective rights by the employees including but not limited to providing representatives with a communication channel to the management and allowing associations to organize their activities on the premises.

f. Equal opportunity

Vendors should abide by the principle of equal opportunity and treatment should apply to all workers in an enterprise, working for the enterprise from an external location, or associated to the enterprise, including part-time workers, casual workers, subcontractors, and outsourced workers.

Enterprises should also promote equality and non-discrimination in their business practices with third parties. This means that all customers and clients should be treated equally regardless of their social origin, religion, ethnicity, if they have a disability or other personal characteristics, and company marketing and PR materials should be made free from any (implicit or explicit) discriminatory or stereotyping messages. Business decisions related to sourcing, contracting, buying or leasing of land etc. should also be made on an equal basis –on the basis of merit and objective value.

g. Resettlement & Rehabilitation in case of land acquisition

The organisation should recognise rehabilitation and resettlement issues as intrinsic to the development process formulated with the active participation of the affected persons, rather than as externally imposed requirements. Additional benefits beyond monetary compensation should be provided to the families affected adversely by involuntary displacement. There should be a careful assessment of the economic disadvantages and social impact of displacement. There must also be a holistic effort aimed at improving the all-round living standards of the affected people.

h. POSH (Prevention of sexual harassment)

The organisation should act towards the prevention of sexual harassment in the workplace by (but not limited to):

- i. Provide a safe working environment at the workplace which shall include safety from third party (outsiders) coming into the contact at the workplace
 - Display penal consequences of sexual harassment.
 - Display information about the grievance handling mechanisms including about the Internal Committee
 - Organize workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the Act
 - Organize orientation programmes for the members of the Internal Committee
 - Treat sexual harassment as misconduct under the service rules and initiate action for such misconduct.

i. Various Rights as envisaged by Human Rights commission and International Labour Organization

The organization should look into various aspects of Human rights beyond its organizational boundary and assure its all stakeholders for the following:

- i. **Right to clean air & water** – Every person has the right to clean air and water. Organisation should take all possible measures to keep the natural resources shared with the community, in as good state as possible.
- ii. **Right to individual and data privacy** – The organisation should not withhold any information or document without the consent of stakeholders.
- iii. **Right of indigenous people in their area of influence** – Indigenous people should be given special privilege in terms of education, employment, skill development etc by the organization.
- iv. **Right of migrant labour** – Migrant workers and members of their families shall not be subjected individually or collectively to arbitrary arrest or detention; they shall not be deprived of their liberty except on such grounds and in accordance with such procedures as are established by law.
- v. **Rights of person with disabilities** – There should be no discrimination with the person with disabilities. Proper support and facilities for employment, restrooms etc should be made available to them by the organisation.

2. Environment

a. Environmental Laws & Record-Keeping

- i. Suppliers shall ensure compliance with all applicable environment laws and regulations across its supply chain.
- ii. Suppliers must take measures to minimize their environmental impact, and document, review, and track their efforts to ensure their effectiveness. If there are any significant environmental impacts, suppliers are required to share the details with the company.
- iii. Suppliers should maintain all necessary and up-to-date environmental permits, approvals and registrations and reporting requirements. These records should be available for inspection by the UltraTech as and when required.
- iv. Supplier should try to obtain ISO 14001 or equivalent certification for environment management systems.

b. Hazardous Substances

- i. Suppliers shall ensure compliance with all relevant laws and regulations for use, storage and disposal of hazardous materials including chemicals.
- ii. Suppliers shall put in place measures to prevent or mitigate accidental exposure to or spills of hazardous substances. These measures should be periodically collated and reported to the UltraTech.

c. Circularity – Sourcing & Recycling

- i. Suppliers shall comply with local laws and regulations on waste disposal, waste segregation, waste treatment and recycling.
- ii. Suppliers must ensure transparency by tracking any materials or products sourced throughout the supply chain including its origin and production facility.
- iii. Suppliers shall ensure that all materials are sustainably sourced and adhere to all applicable laws and regulations through its supply chain. Tracking information of the materials should be made available to the UltraTech.
- iv. Suppliers should utilize measures such as waste management, materials substitution, segregation & labelling, to increase recyclability of materials and reduce waste.
- v. Suppliers should strive to use recyclable or compostable packaging materials.
- vi. Suppliers must strive to create and implement a comprehensive zero-waste plan and periodically report its progress to the UltraTech.

d. Environmental Impact

- i. Suppliers shall adhere to all applicable laws and regulations regarding environmental pollution, including but not limited to laws on deforestation, biodiversity conservation, greenhouse gas emissions, wastewater discharge, and any other relevant laws.
- ii. Suppliers are prohibited from conducting any operations within areas including buffer zones that are recognized as globally or nationally important for their biodiversity. This includes, but is not limited to, protected areas such as national parks, wildlife reserves, and other areas designated for conservation purposes.
- iii. If a supplier is operating in areas that are near critical biodiversity, they must apply the mitigation hierarchy, which includes avoiding impacts on biodiversity where possible, minimizing impacts where avoidance is not possible, restoring any damage caused, and offsetting any residual impacts.
- iv. Suppliers shall recognize the risks of climate change and take proactive measures to minimize and manage their impact. Suppliers should assess the potential physical risks posed by climate change, including but not limited to natural disasters and extreme weather events, and develop contingency plans to mitigate the impact of such risks on their operations, supply chains, and the environment.

- v. Supplier shall actively reduce usage of resources and material that threaten biodiversity and/or encourage deforestation.
- vi. Suppliers shall not make use of any resource that has long term impact on biodiversity.
- vii. Suppliers are required to track and report on all emissions generated. This includes emissions from transportation, manufacturing, and other relevant sources. This information should be available in a clear and easily understandable format and include all relevant data such as the quantity of emissions, the emission source, and the period in which the emissions were generated. Furthermore, the supplier must provide this information to UltraTech upon request.
- viii. Suppliers are expected to ensure efficient use of natural resources such as water and energy.
- ix. Suppliers shall take active steps to reduce the use of non-renewable sources in their energy use either through reducing consumption through improving energy-efficiency or utilizing alternative non-polluting sources of energy.
- x. Suppliers should define an action plan to monitor and reduce air pollution and greenhouse gas emissions in their supply chain.
- xi. Suppliers shall monitor and reduce freshwater consumption and wastewater generation by measures such as reducing water use, reuse, and recycling, appropriate wastewater treatment, and rainwater harvesting.
- xii. Suppliers should strive to reduce the adverse environmental impact of their supply chain.

e. Design for Environment

- i. The organization should continuously endeavor to design/redesign its product to create minimal impact on environment.
- ii. The organization may involve use of Design for Environment or Life cycle Assessment (LCA) tool to understand the impact of its products and take corrective measures for the same.

3. Occupational Health & Safety

a. Occupational Health

- i. In accordance with local laws and regulations, suppliers shall ensure that employees, contractors, and subcontractors are provided with a safe and healthy working environment including but not limited to:
 - a1. First Aid & Emergency Medical Response
 - a2. Compliance with the WASH pledge for general sanitation and hygiene including unrestricted access to toilets and potable water, and sanitary food preparation, eating and storage facilities.
 - a3. Medical facilities including routine medical checks and vaccination.
 - a4. Access to gender-specific, changing rooms and dormitories if provided.
 - a5. If the supplier is not able to provide such amenities, clear rationale with a proposed alternative should be formalized with the employees and made available.
 - a6. Suppliers shall conduct risk assessments to identify, evaluate, and control worker exposure to any chemical, physical and biological agents according to the hierarchy of controls through proper design, engineering, and administrative controls. Suppliers shall protect workers' health by adopting appropriate personal protective equipment.
 - a7. Suppliers shall conduct risk assessments to identify, evaluate, and control worker exposure to the hazards physically demanding tasks, including, but not limited to, manual material handling, repetitive lifting, awkward postures, prolonged standing and or highly repetitive assembly tasks.

- a8. Occupational health concerns of workers should be tracked, investigated and documented. Supplier shall provide adequate compensation, monetary or otherwise, to workers that suffer from occupational health concerns. These incidents should be adequately documented and made available to the UltraTech for inspection.
- a9. Suppliers shall clearly post health and safety-related information in the workplace that complies with local laws and industry standards (apply the highest standard) in employees' primary language.
- a10. Supplier must take a proactive approach to minimize occupational illness including tackling mental health concerns and concerns related to ergonomics.
- a11. Suppliers should take the health of its employees post their superannuation as there could be chances of occupational illness coming up at later stage of life
- a12. In case an employee is found temporarily unfit for the job one used to perform, there should be a provision for job rotation or compensation in lieu of no service.

b. Safety

- i. In accordance with local laws and regulations, suppliers shall ensure safety of all employees, contractors, subcontractors and visitors.
- ii. Suppliers should routinely carry safety risk assessment checks in their supply chain.
- iii. Supplier shall routinely inspect machinery to reduce risk of accidents. Suppliers should also undertake adequate measures such as installation of barriers, engineering controls, and physical guards to reduce workers' exposure to safety hazards.
- iv. Suppliers must ensure adequate training and safeguards for employees involved in handling of hazardous materials.
- v. Suppliers shall provide workers with regular training in health and safety procedures in their local language.
- vi. Work-related injuries of workers should be tracked, investigated, and documented. Suppliers should provide adequate compensation, monetary or otherwise, to workers that suffer from work-related injuries. These incidents should be adequately documented and made available to the UltraTech for inspection.
- vii. Suppliers should try to obtain ISO 45001 or equivalent certification for safety management systems.

c. Emergency Preparedness

- i. Supplier shall maintain compliance with all local laws and regulations on emergency hazards for example fire safety, leakages and others, and also for natural disaster and crisis management.
- ii. Suppliers should ensure adequate preparation, such as unlocked and clear exits, installation of smoke alarms, marking safe assembly places, evacuation plans for disasters or emergencies.
- iii. Suppliers shall routinely conduct training and drills for their workers to ensure adequate disaster response.
- iv. Suppliers should prepare emergency response plans and brief workers in advance to ensure safety of workers during emergencies.

4. Governance

a. Business Ethics – Conflict of Interest & Fair Competition

- i. Supplier shall ensure compliance with applicable local laws and regulations including financial laws, taxation laws, competition laws, antitrust laws and insider trading regulations.

- ii. Suppliers should uphold high level of business ethics in their conduct including maintenance of business records.
- iii. Suppliers shall avoid actions or conditions that could result in a conflict of interest, actual or perceived. Any instance of such conflict must be reported to the UltraTech.
- iv. Suppliers should not indulge in uncompetitive practices such as price fixing or cartelization.
- v. If UltraTech's staff or former employees have participated in the procurement process, suppliers shall not offer them employment for one year following separation from service.
- vi. The Supplier shall ensure that their employees have authorization to access or use UltraTech assets, properties, information, and intellectual rights for official purposes only, according to the terms of the Supplier's engagement with the UltraTech.

b. Bribery, Kickback & Corruption

- i. Supplier shall not give or receive any financial benefits, meals, entertainment, or any other benefit with the intention of improperly influencing actions performed or decisions taken in good faith. Any action, regulatory or otherwise, initiated against the supplier due to improper behaviour must be immediately reported to the UltraTech.
- ii. Suppliers should maintain an internal investigation mechanism to identify and penalize instances of improper conduct by workers, contractors or subcontractors.
- iii. Suppliers should provide periodic internal training to prevent instances of improper conduct.
- iv. Suppliers must compete in an independent, open and fair manner and not knowingly enter into business arrangements that eliminate or discourage competition, or that provide them an improper competitive advantage.

c. Privacy, Intellectual Property, Confidentiality & Data Protection

- i. Suppliers shall ensure compliance with relevant laws and regulations concerning privacy, intellectual property, and data protection across its supply chain.
- ii. Suppliers should ensure creation, maintenance, storage and disposal of data including business records, employee information and intellectual property, maintaining confidentiality and compliance with local laws and regulations.
- iii. Suppliers shall ensure adequate cyber security measures for data protection based on industrial standards. Suppliers should regulate internal access to sensitive data including records of employees, intellectual property, or other critical and sensitive documents from UltraTech.
- iv. Suppliers shall immediately inform relevant stakeholders including their workers and the UltraTech in case of a security breach or a data leak or any manner of compromise in the integrity of the data including intellectual property of the UltraTech.
- v. Suppliers must obtain prior permission from UltraTech before using the company logo or products. Additionally, suppliers must not misuse UltraTech logo or misrepresent its products. Any engagement in malicious propaganda is strictly prohibited.

d. Monitoring & Compliance

- i. Suppliers shall ensure compliance with this Code by their employees, contractors and subcontractors.
- ii. Suppliers are advised to create their own sustainability policies that are consistent with UltraTech policies and UltraTech Sustainable Business Framework. Alternatively, suppliers may choose to directly implement UltraTech policies to ensure their practices meet our expectations.
- iii. Suppliers should create and implement a whistleblower policy to protect whistleblowers against retaliation.
- iv. Suppliers should periodically prepare a consolidated report on compliance with the Code and information on instances of violation and investigation into such violations.

e. Grievance Redressal

- i. All employees, contractors and subcontractors of the Supplier can report non-compliance of the Code directly to the UltraTech through email at abg.ethicshelpline@integritymatters.in or through phone at 1800-102-6969
- ii. Suppliers should circulate and publicize the UltraTech grievance redressal contact.

5. Community

a. Community Engagement

- ii. Suppliers should engage the local communities to foster their social and economic development.
- iii. Suppliers should bring about tangible improvements in the educational, cultural, social and economic well-being of the local communities.
- iv. Suppliers are expected to proactively address and resolve community grievances by implementing effective measures.

Obligations of Suppliers

Suppliers shall ensure that the Supplier Code is communicated to their employees, subsidiaries, business partners and subcontractors involved in providing services to UltraTech in the language known to them and that they abide by the same.

Compliance with the Supplier Code is required in addition to any other obligations in any agreement a Supplier may have with UltraTech. Suppliers must self-monitor and demonstrate their compliance with the Supplier Code. Suppliers shall actively audit and manage their day-to-day management and share reports with UltraTech upon request. UltraTech reserves the right to conduct audits with prior intimation to Suppliers. Without limitation, such audits may include Environmental, Social, Governance (ESG) parameters, Sustainability, Social compliance, Modern Slavery, Information security, Business continuity, applicable Statutory and regulatory compliances and adherence to other contractual commitments. These audits and assessments may be performed physically at Suppliers' premise, virtually or in hybrid mode (partially physical and partially virtual) by UltraTech or by its nominated third party.

Suppliers shall support such audits in their organization in line with outlined scope of audit. Adherence to the audit timelines and production of relevant artifacts sought during audit and submission of corrective action with appropriate evidence to all the audit findings within the timelines is mandatory. While UltraTech will work with Suppliers to improve compliance, failure to cooperate or comply to the audit requirements may result in appropriate action including but not limited to termination of the services with the Supplier.

Name and Signature of Authorized Signatory: _____

Seal of the Supplier with Date: _____