





Supplier Code of Conduct

Quality, Social, Health, Safety and Environment

We, Privi Specialty Chemicals Limited (hereinafter referred to as 'PSCL') have a strong commitment to economic, environmental and socially sustainable development. PSCL places the emphasis on the Sustainability, performance, quality, reliability and integrity of its products and services. We have developed, implemented and continuously improved a comprehensive Integrated Management System (IMS) based on ISO 9001, 14001 & 45001. We are also member of Suppliers Ethical Data Exchange, Sedex. As a further step in line with our commitment to product quality, economic, environmental & socially sustainable development, we have adopted a sustainable procurement policy which applies to all purchases of goods and services. We expect that our suppliers will also follow the same.

The objective of this code of conduct is to provide you with clear requirements in a concise and succinct manner. We expect our suppliers to meet and exceed our expectations set forth in this Code and believe that through a true partnership with our suppliers we will consistently build on respective principles. This code shall apply to all suppliers, their parent entities and subsidiaries, subcontractors, and others with whom they do business ("suppliers"). Suppliers will ensure that the Code is communicated to their employees and subcontractors in a manner understandable to all. While we attempt to make these requirements transparent and easily understood, it is recognized that due to the nature of your products, some exceptions may apply.

For general questions or comments on the Code, Supplier may contact Supplier's procurement contact at PSCL or regulatory@privi.co.in.

	
Prepared by	Approved by
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Manager - Purchase	Sr.Vice President – Sustainability & Procurement

PSCL Supplier Code of Conduct





Suppliers are expected to provide a safe and healthy working environment and to operate in an environmentally responsible and efficient manner. Suppliers will integrate sustainability and quality into their business processes. Suppliers will comply with all applicable social, health, safety and environmental regulations and product regulatory requirements. All required permits, licenses and registrations will be obtained, maintained, and kept up-to date. Suppliers will fulfill their operational and reporting requirements.

Essential of Supplier Code of Conduct

PSCL seeks to ensure that the working conditions at suppliers of the products and services we purchase meet the national standards of the International Labour Organization (ILO).

We expect our suppliers to adopt and demonstrate the following standards of social compliance:

- **Prohibition on Child Labor:** To promote eradication of child labor in a pro-active manner, we encourage our suppliers to work towards a no child-labor policy.
- **Forced labor:** Suppliers shall not practice forced labor or compulsory labor. Suppliers shall ensure that its employees are employed with their own free. There should be no forced, bonded or involuntary labor and no workers are required to lodge “deposits” or identify papers with their employers and should be able to leave after giving reasonable notice.
- **Health, Safety and Hygiene:** All employees should expect to work in an environment that is both safe and healthy. Adequate steps should be taken to prevent accidents occurring in the normal course of work. Employees and Workers should receive suitable health and safety training and have access to clean toilet facilities and clean drinking water as required.
- **Discipline:** Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is not acceptable. Disciplinary and grievance procedures shall be clearly documented and communicated to all employees. All Disciplinary measures of serious nature shall be recorded.
- **Freedom of Association and Employee Representation:** All workers and employers have right to form and join organizations of their own choosing without prior authorization.
- **Working Hours:** Working hours should not be excessive and shall comply with relevant national laws. Overtime should be voluntary.

	
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- **Equity Employment Opportunity/No Harassment:** Organizations will seek to eliminate discrimination in access to employment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and promote equality of opportunity and treatment.
- **Remuneration:** Wages and benefits afforded to workers should meet national standards. Workers should be provided with clear written information on their pay and conditions. Excessive deductions on wages should not be permitted as a disciplinary measure.
- **Employment terms:** All workers should be provided with simple, written contracts which must detail in terms and conditions of their employment. Contracts should be clearly understandable to each worker. Work performed should be on the basis of recognized employment law and practice.
- **Community impact:** Organizations are encouraged to support the communities in which they operate through appropriate community initiatives,



Environment, Health and Safety

Suppliers are expected to conduct safe and environmental operations. Suppliers shall consume energy, water and other natural resources in a responsible manner.

Material Safety Data Sheet (MSDS) containing all necessary safety-relevant information will be made available by suppliers for all chemical products to PSCL and other parties too in a case of a legitimate need. Suppliers shall take precautions for safe handling storage and transportation of the chemicals as per the existing legislation and (M)SDS. Supplier shall ensure all containers of chemicals - including temporary containers - are properly labeled with appropriate danger symbols and chemical names to ensure the contents are known and the potential risk minimized.

PSCL's suppliers are expected to establish and implement a quality assurance system (ISO 9001) or other equivalent quality assurance system. The suppliers are expected to meet agreed upon product specifications and quality requirements in order to provide goods and services that consistently meet PSCL's needs, perform as intended and are safe for their intended use. These product specifications and quality requirements shall be defined in specification documents such as supply agreements, quality agreements, Purchase Orders and/or other quality documentation.

Ethics and Business Conduct

	
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PSCL's suppliers are expected to behave ethically and with integrity in all business transactions. As such, they shall:

- Uphold standards for fair business practices including accurate and truthful advertising, fair competition, and antitrust.
- Prohibit payment of bribes, illegal political contributions, or other illicit payments or methods for any reason, including the waiver of penalties or fines or the receipt of any other special benefits.
- Safeguard against improper use of intellectual property, including disclosure of confidential or sensitive information, pricing, employee information or patient information.

Waste and Emissions

Suppliers will have systems in place to ensure safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any of these activities which have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and treated 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. Suppliers shall indicate safe disposal methods for hazardous waste generated if any while using the chemicals supplied by them.

Use of Assets and Electronic Resources

Suppliers shall ensure that their employees utilize any's assets (both tangible and intangible) And electronic communications devices / resources in a legal and ethical manner.



Communications

Suppliers shall periodically convey this code to their employees and be encouraged to conduct periodic self-evaluations to ensure compliance.

Violations of this Code of Conduct

Failure to comply with this code of conduct or any other applicable law/regulations by suppliers shall result in termination of our business relationship/association/contract with the supplier.

Transportations of Hazardous Chemicals/Heavy materials

	
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- Motor Vehicle Act, 1989 and related rules/laws including amendments thereof and all other application regulations must be followed strictly as applicable. Vehicles must carry updated Permit, Fitness, Insurance & Other certifications required, if any, by Indian law.
- All vehicles should have a valid 'Pollution Under Control Certificate'(PUC) wherever applicable.
- To train drivers to handle emergency situations during transportation.
- To make concerned Drivers/Staff aware the danger related to transportation of Hazardous materials/ lifting, handling & titling of large/heavy materials.
- The Driver should have transport emergency card with him wherever applicable.
- Maintenance agencies/Drivers should know about Environmental Impacts arising from the specified activities pertaining to the use of Fuels, Lube Oils, its spillage, disposal of various harmful items used in automotive vehicles and similar other operations which are going to affect the Environment.
- Must be aware of the consequence of over-loading & under-loading from the specified norms so that optimum use of vehicles can be achieved.
- All vehicles should be kept in proper maintained conditions and for this, periodic preventive maintenance/servicing should be done whenever necessary.
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Resource Conservation and Climate Protection

Suppliers shall use natural resources (e.g water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate will be minimized or eliminated at their source or by practices such as modification of production, maintenance and facility processes, material substitution, conservation, recycling and material utilization. Suppliers will engage in the development of climate-friendly products and processes to monitor and reduce their power consumption and greenhouse gas emissions (Scope 1 & Scope 2).

Preservation of Biodiversity and Sustainable Forest products: Applicable only to those suppliers which supply to PSCL the materials having plant (botanical)/Forest origin, excluding wooden packaging or Secondary or Tertiary packaging:

Suppliers shall comply with all the applicable biodiversity laws. Also, Suppliers are expected to make responsible to make origin (upto district of the country of plantations/forest) of the materials, if the materials are not covered within any Forestry product sustainability certifications (e,g FSC, PEFC).

Confidentiality:

	
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Suppliers shall protect business and personal information obtained as a result of business relationships for performing jobs assigned by and not share this confidential information with any unauthorized person in any manner whatsoever.

Acknowledgement by Supplier

To ensure ongoing compliance, Suppliers should establish and maintain an appropriate management and monitoring practice where the scope is related to the content of this code.

Suppliers are expected to implement management systems to facilitate adherence to all applicable laws and to promote continual improvement with respect to the expectations set forth in this Supplier Code of Conduct. PSCL may conduct announced audit at the Supplier's sites, including the Supplier's manufacturing facilities in order to verify that the supplier is in compliance with the Code. The audit may be performed either by PSCL pertaining to quality, regulatory, management standards, social, ethical, environmental, health and safety performance.

Supplier Name:

Supplier Representative Name:

Supplier Representative Designation:



Supplier Representative Sign:

Supplier Stamp:

Date:

Acknowledgement Statement

☐ We acknowledge and accept Privi's Supplier Code of Conduct and commit to adhering to all applicable ethical, legal, and environmental standards.

	
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