



DEEPAK NITRITE LTD



SUSTAINABLE PROCUREMENT POLICY

Partnerships based on responsible sourcing are an integral part of the supply chain at Deepak Nitrite Ltd (DNL).

We have established Suppliers' code of conduct, which sets forth the basic requirements that we ask our Suppliers to respect and adhere to when conducting business with DNL. This Code embodies DNL's commitment to internationally recognized standards, including UN Global Compact initiatives, Core Conventions of the International Labour Organization, Universal Declaration of Human Rights, Responsible Care® program as well as prevalent industry standards, and all other relevant and applicable statutory requirements concerning Environment Protection, Minimum Wages, Child Labour, Anti-Bribery, Anticorruption, Health and Safety, whichever requirements impose the highest standards of conduct.

We encourage our contractors, suppliers, transporters, service providers and business partners to ensure total compliance to applicable legal and other requirements which have a significant impact on Occupational Health, Safety, Environment, Quality, and other applicable Social and Governance aspects.

Managing and build capacity for our suppliers to meet the requirement in all these areas is a fundamental part throughout our business. We act responsibly towards our suppliers and rely on them to act responsibly. We offer our support to partners in their efforts to meet their responsibilities.

We assess and improve sustainability practices within the supply chain of companies. Whenever we become aware of violations, we urge to end these. Where appropriate, we intervene at appropriate level to tackle the challenges together, on a broader basis of stakeholders.

In other cases, we may choose to explore business alternatives and reserve the right to terminate business relations.

We expect our suppliers to aspire to the same standards in their business operations.

Date : April 1, 2021

Chief Executive Officer &
Executive Director

CODE OF CONDUCT FOR SUPPLIERS

INTRODUCTION

We have established Suppliers' code of conduct, which sets forth the basic requirements that adhere to while conducting business with DNL. We expect, all our suppliers, contractors, transporters, service providers and business partners to comply with this Supplier Code of Conduct.

We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

1.0	LABOUR AND HUMAN RIGHTS
1.1	Fair Treatment
	Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Examples of conduct that could be characterized as "harassment" include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting company-provided facilities.
1.2	No Involuntary Labour or Human Trafficking
	Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labour. This includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. As part of this commitment to prohibiting human trafficking, suppliers may not engage in either (i) destroying, concealing, or confiscating identity or immigration documents; (ii) using fraudulent recruiting tactics; or (iii) charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.
1.3	No Child Labour
	Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be either 18 years of age (except the provision stated in section 10(4a), 68 and 69 of the Factories Act 1948), or the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Supplier Code does not prohibit participation in legitimate workplace apprenticeship programs.
1.4	Wages and Benefits
	Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition, workers shall be compensated for overtime hours at the rate required by applicable laws and regulations.
1.5	Subcontractor Compliance
	Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code. Our Suppliers also commit that they will not engage in business with any person or entity, which they have reason to believe has not complied with the above principles.

2.0	HEALTH AND SAFETY
	Suppliers shall comply will all applicable health, safety and environmental laws and regulations. Suppliers should address the following in their health and safety programs:
2.1	Occupational Safety
	Suppliers shall commit to the safety and health of their employees and shall ensure that required training of personnel has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.
2.2	Emergency Preparedness
	Suppliers shall have emergency plans and response procedures that implement all applicable laws and regulations regarding (i) emergency preparedness, reporting and notification; (ii) evacuation procedures, training and drills; (iii) appropriate hazard detection and suppression equipment; and (iv) adequate exit facilities from suppliers' sites.
2.3	Occupational Injury and Illness
	Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses, and exposure of workers to chemical, biological and physical agents. These procedures and systems shall implement all applicable laws and regulations, including, as applicable, provisions to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.
2.4	Sanitation, Food and Housing
	Suppliers shall provide workers with clean toilet facilities and access to potable water. If food preparation and storage facilities are provided, the same shall be sanitary. Worker dormitories provided by the Supplier or a third-party agency shall be clean and safe and shall provide adequate emergency egress, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.
3.0	ENVIRONMENTAL
	Suppliers shall comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall: <ul style="list-style-type: none"> (i) Obtain and keep current all required environmental permits and registrations, (ii) Reduce, control and/or eliminate wastewater, waste and pollution at the source, (iii) Reduce, control and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products, (iv) Conform to applicable labelling and warning requirements; and (v) Identify, manage, store, move and handle hazardous substances in accordance with law.
4.0	INTEGRITY AND ANTI-CORRUPTION
4.1	Books and Records
	Suppliers are expected to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on applicable retention requirements.

4.2	Anti-corruption
	<p>Suppliers shall comply with the laws and regulations of all applicable jurisdictions, including all applicable anticorruption laws. Suppliers may not solicit, give or receive commercial bribes or unlawful kickbacks and must also be careful to avoid even the appearance of such improper conduct. Suppliers will conduct their businesses without engaging in corrupt practices and will not take advantage of anyone through unfair dealing practices. This means that suppliers should not misrepresent the quality, features or availability of their products or service. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record keeping.</p> <p>Suppliers commit that they will not engage in business with any person or entity, which they have reason to believe has not complied with the above principles.</p>
4.3	Protection of Intellectual Property
	<p>Suppliers shall respect intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.</p>
4.4	Substance Abuse
	<p>Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescribed or non-prescribed. In addition, suppliers will put in place policies and procedures that prohibit employees from using, possessing, transferring or selling illegal drugs or alcohol or misused medication (whether prescription or non-prescription) while at work or while on the job.</p>
4.5	Quality
	<p>Suppliers shall take due care to ensure their work product meets applicable quality standards. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.</p>
5.0	TRADE COMPLIANCE
	<p>For the purposes of this section, the following meanings are attributed to the below:</p> <p>“Sanctions” means the economic sanctions laws, embargoes, ordinance, executive orders, regulations, or restrictive measures administered, enacted or enforced from time to time by an intergovernmental organization, or any governmental or regulatory authority of any country.</p> <p>“Restricted Person” means a person that is (i) located in, incorporated under the laws of, or owned or controlled (directly or indirectly) by, or acting on behalf of, a person located in or organised under the laws of a country or territory that is the target of country-wide or territory-wide Sanctions; or (ii) otherwise a target of Sanctions, that is, a person who would be prohibited or restricted by law or otherwise from engaging in trade, business or other activities.</p> <p>Our Suppliers acknowledge that any breach of export control laws can have severe impact on DNL’s reputation and the reputation of its suppliers and customers. Our suppliers are, therefore, expected to observe the highest standard of conduct to ensure that they and their business partners in their supply chain are complying with all laws and regulations imposing Sanctions on any person and that they are not engaged in business with any Restricted Person.</p>

6.0	DATA PROTECTION
	Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall protect confidential and proprietary information, including confidential and proprietary information of others and personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronics security procedures. Suppliers are to comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
7.0	MANAGEMENT SYSTEM
	Suppliers shall adopt and implement a management system to comply with the principles set forth in this Supplier Code. Management systems will vary from supplier to supplier based upon the size and scope of the business and risks. The management system will be designed to ensure <ul style="list-style-type: none"> a) compliance with applicable laws, regulations and customer requirements. b) conformance with this Supplier Code; c) mitigation of risks; and d) a process to track, measure and drive improvements in the management system. <p>The management system should contain at minimum the following elements.</p>
7.1	Company Commitment and Management Accountability through policy statements affirming the supplier's commitment to compliance and identifying a company representative[s] responsible for ensuring implementation of the management systems.
7.2	Risk Assessment and Risk Management process to identify risks associated with the supplier's operations. As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may impact its business and that of its customers relating to, but not limited to, environmental, restricted material usage, conflict minerals and hazardous waste.
7.3	Training Programs for training managers and workers to implement the supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
7.4	Standards, Audits and Assessments to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.
7.5	Corrective Action Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
7.6	Documentation and Records to ensure compliance with the principles of this Supplier Code.
7.7	A Process to Communicate Supplier Code Requirements to monitor compliance to the Supplier Code.
8.0	REPORTING CONCERNS
	If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it. Please note that failure to comply with this Supplier Code may result in termination as a DNL supplier and possible legal action. You may make a report to the concerned officer of Deepak Nitrite Ltd. E.mail: info@godeepak.com
	DNL will treat all reports confidential to the extent possible, consistent with the law, company policy and DNL's need to conduct a thorough investigation. All reports will be investigated promptly and thoroughly, consistent with applicable law, and may be reported to the appropriate authorities upon the advice and approval of DNL's legal department.