



SUPPLIER CODE OF CONDUCT

Dear Valued Supplier,

We, at **Harman Finochem Ltd.** strives to create long-term, shared value for our stakeholders by following sustainability path through balancing economic, environmental and social impacts in our decision making and activities. It is our mission to manufacture sustainable and environmentally friendly products, respecting human rights, and work closely with local communities where we operate facilities.

Scope

This Supplier code applies to all suppliers where we have a contractual relationship, including contractors, and suppliers of goods and services.

This supplier code of conduct will form an integral part of all new or renewed commercial agreements between suppliers and us.

Requirements:

All suppliers must adhere to the following principles:

1 Environment Protection

The Suppliers are expected to maintain compliance with all applicable environmental laws and regulations in their operations. Suppliers shall minimize the adverse environmental impacts of their operations, products, and services. We expect our suppliers to implement the environmental management system aligned with recognized international standards such as ISO14001 or the Eco-Management and Audit System (EMAS), and third-party certification is encouraged.

Environmental Permits and Reporting. All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

Pollution Prevention and Resource Reduction. Supplier shall optimize its consumption of natural resources, including water, fossil fuels, and minerals by conserving these or by practice such as modifying production, maintenance, and facility processes, materials substitution, re-use, conservation, recycling or other means. And measures should be implemented to prevent pollution and minimize the generation of waste and emissions at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.





Hazardous Substances. Chemicals, waste and other materials posing a hazard to humans or the environment are to be identified, labeled and managed to ensure their safe handling, storage, use, recycling or reuse, and disposal.

Solid Waste. Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous)

Water Management. Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

Energy Consumption, Climate Change, and Greenhouse Gas Emissions. Suppliers must identify, monitor and minimize relevant greenhouse gas (GHG) emissions and energy consumption from their operations. Supplier shall look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

2. **Laws and Regulations**

The suppliers shall comply with all applicable laws, rules and regulations, and requirements in the country of operation especially related to Human rights, Governance, Environment, Health & safety while also complying with international norms especially related to OECD Guidelines and modern Slavery including conflict-affected & high-risk areas (CAHRA) in line with company's commitment to these guidelines.

3. **Employment Practices/ Human Rights**

The suppliers shall follow fair employment practices and respect human rights instruments, among others, the following principles:

- Suppliers shall not employ anyone under the legal working age, nor condone physical or other unlawful abuse or harassment in any of their businesses;
- Suppliers shall ensure that there is no forced labor, slavery or human trafficking within their operations and their supply chain;
- Suppliers shall judge their employees upon their abilities and not discriminate on the basis of any condition or characteristic which is protected by applicable law or regulation such as gender, race, religion etc.
- Suppliers shall respect each employee's right to associate and right to collective bargaining and
- Work hours, wages and benefits shall be in compliance with all applicable laws.
- Child labor is not to be used in any stage of manufacturing. The minimum age for employment or work is 18 years of age, the minimum age for employment in the relevant



country, or the age for completing the compulsory education in the relevant country. The use of legitimate workplace learning programs, which comply with applicable laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

- Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least 1 (one) day off every seven days.
- Suppliers shall respect the right of their workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

4. Health & Safety

We expect our suppliers to provide a safe work environment in compliance with local laws and sector practices and to implement policies and regulations in order to minimize accidents or injuries and the health wellbeing of its employees.

Suppliers shall provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities. We expect our suppliers to implement the health & safety management system aligned with recognized international standards such as ISO 45001, and a third-party certification is encouraged.

Occupational Safety. Suppliers shall identify and assess workplace hazards (e.g., chemical, electrical, and other energy sources, fire etc.) and control these through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Reasonable steps should be taken to protect pregnant women/nursing mothers.

Emergency Preparedness. Supplier shall identify, assess and be prepared for emergency situations by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

Occupational Injury and Illness. Supplier shall ensure that procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to:

encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

Industrial Hygiene. Supplier workers exposure to chemical, biological and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately eliminated or controlled, workers shall be provided with and use appropriate personal protective equipment.

Physically Demanding Work. Supplier workers exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

Machine Safeguarding. Supplier shall ensure that production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

Sanitation, Food, and Housing. Supplier shall provide workers with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier or a labor agent must be clean and safe, and provided with appropriate emergency egress, hot water, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

Health and Safety Communication. Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation

5. Product & Service Quality

Supplier will be expected to deliver product and services as per contract/purchase order quality specification in good trust and professional manner adhering to above requirements.

6. Ethical Practices.

Suppliers shall conduct their business in accordance with the highest standard of ethical behavior and in accordance with applicable laws and regulations. Suppliers are expected to conform to the requirements in the following areas:



Fair Competition

We are committed to fair competition practices in the marketplace. The suppliers shall not communicate with competitors regarding current or future prices, production levels or any other information that relates to the marketplace.

Suppliers shall conduct their business in full compliance with fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws.

Conflict of Interest. Suppliers must avoid actual, potential or perceived conflicts of interest with Company employees. If these occur, supplier must disclose such a conflict, so that appropriate steps are taken to manage the situation.

Disclosure of Information. All business dealings should be transparently performed and accurately reflected on supplier's business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Privacy. Supplier shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Supplier shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

PERSONAL DATA PROTECTION

Company may transfer personal data of its employees, directors or other persons ("Personal Data Subjects") during its normal course of business with its suppliers. With respect to such personal data, the Supplier shall:

- Be aware of and comply with the applicable laws with respect to personal data confidentiality and protection;
- Guarantee that such personal data shall be processed, stored and transferred in accordance with the requirements under the applicable laws;
- Obtain consent from and notify the rights to the Personal Data Subjects, prior to transfer of such personal data to any third party for the purpose of storing and processing;
- Ensure that such personal data is transferred and processed only for the purpose for which the Personal Data Subjects have given their consent;





- Indemnify Company/ Personal Data Subjects, against any claim, loss and damages arising out of the breach of any applicable laws with the respect to such personal data;
- Ensure protection of such personal data through organizational or technical means from unauthorized access or processing;
- Ensure compliance with applicable personal data protection laws/ processes in case the Personal Data Subject recalls any of its consent.

Intellectual Property. Suppliers shall respect the intellectual property rights of others, including Company, its affiliates and business partners. Suppliers must take appropriate steps to safeguard and maintain confidential and proprietary information of Company and shall use such information only for the purposes specified for use by Company. Suppliers shall observe and respect all Company's patents, trademarks and copyrights and comply with all requirements as to their use as established by the Company. Suppliers shall not transmit confidential or proprietary information of the Company via the internet unless such information is encrypted accordance with minimum standards established by the Company.

7 Bribery and Corruption

We have a strict policy against bribery and corruption. Suppliers shall not offer any bribe or provide entertainment and gifts or anything of value directly or indirectly to government officials or others so as to influence them in the performance or non-performance of their duties or induce them to use their influence or secure any improper advantage or to retain business with us.

Supplier shall uphold the highest standards of integrity in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given or accepted. No funds or assets of the supplier shall be paid, loaned or otherwise disbursed as bribes, or other payments designed to influence or compromise the conduct of Company, its employees or representatives.

8 Monitoring of Compliance

The suppliers will be expected to conduct periodic self-assessment and submit results to us. Depending on need and risk level, our or nominated agency personnel shall be allowed access to your premises to monitor compliance with this supplier code of conduct.





9 Application/ Exclusion

This Code is a general statement of Company's expectations with respect to suppliers. All Company suppliers, their employees and extended supply chain are expected to comply with the requirements detailed in this Code. This Code should not be read in lieu of, but in addition to, any supplier obligations as set forth in any (i) request for proposal or other solicitation, or (ii) agreements by and between Company and the supplier. In the event of a conflict between this Code and any Company document or applicable agreement, the terms of that document or applicable agreement shall control. No exclusions are applicable to this Code.

10. Whistle blower protection and anonymous complaints

Suppliers must create programs to ensure the protection of workers/employees,' whistle blower confidentiality and prohibit retaliation against workers, who participate in such programs in good faith or refuse an order that is in violation of the Supplier Code of Conduct. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

11. MANAGEMENT SYSTEMS

a. Commitment and accountability: Our suppliers shall demonstrate their commitment to the concepts contained in this code of conduct by allocating adequate resources and designating senior accountable persons.

c. Risk management: In all the areas covered under this COC, our suppliers shall have the processes in place to identify and manage risks.

d. Documentation: Our suppliers shall keep all the required documents to demonstrate compliance with both the principles mentioned and applicable regulations.

e. Training and competency: Our suppliers shall have a training program in place to ensure that management and staff has the necessary knowledge, skills and abilities to meet the requirements of the principles mentioned in this policy.

f. Continual improvement: Our suppliers are expected to set performance objectives, facilitate implementation plans and take appropriate corrective actions steps for inconsistencies found by internal or external evaluations, inspections and management reviews.

g. Identification of concerns: Our suppliers are expected to encourage their employees to report any workplace issues, unlawful activity, or violations of these principles without fear of retaliation, intimidation, or harassment. Suppliers shall investigate and, if necessary, take corrective action.

h. Communication: Our vendors shall have strong procedures in place to communicate these Principles to their employees, contractors, and vendors.





i. Insider Trading

Suppliers should never communicate externally about company's prospects, performance or policies nor disclose inside information which would affect the interest of the company unless they are required under any law or by an order from a competent authority. Suppliers are forbidden from making any public posting of confidential or proprietary information related to any aspect of company's business.

12. Acceptance of Entertainment and gifts

Company employees should never accept or offer gifts, favors, services, entertainment, money or other items of value that are intended to influence judgment or actions of its suppliers. Suppliers are expected not to offer any kind of gifts or any other kind of personal benefit to Company's employees resulting from the relationships with the Suppliers. The Supplier is committed to work against all forms of corruption, money, gifts, loans and rebates of unreasonable value which are in noncompliance with all applicable laws, rules and regulations.

13. Animal Welfare

Animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

14. Business Continuity

The Supplier shall ensure that there are plans and procedures to resume business in the event of any physical disaster (e.g., Such as fire, flood, wind, earthquake, explosion, etc.) or work stoppage of any kind (e.g., Labor strike, economic/social structure breakdown, etc.). Subject to mutual agreement on business continuity plan terms by both parties, the Supplier shall resume services within committed timelines following a disaster or work stoppage event.

15. Third Party engaged by Supplier

In event the Suppliers engage any third party to provide services/goods to company, Suppliers shall ensure that such third party adheres to the Supplier Code and does not indulge in any activity that violates the terms of the Supplier Code. Suppliers shall be responsible to monitor compliances by such third party and determine that they are in accordance with the applicable laws and regulations.

16. Acknowledgement

Please return a copy of this supplier code of conduct to Harman Finochem as token of your review and acceptance.

For Harman Finochem Ltd.

Director