



## **MITSU CHEM PLAST LIMITED**

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MARG, MULUND (W), MUMBAI – 400 080.

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## **SUPPLIER CODE OF CONDUCT POLICY**

## **1.0 APPLICABILITY & OBJECTIVE:**

At Mitsu Chem Plast Limited, we are committed to conducting business in an ethical, transparent, and responsible manner. As part of our commitment to sustainability and social responsibility, we expect our suppliers to adhere to our Supplier Code of Conduct policies.

This Supplier Code of Conduct is applicable to all ‘Suppliers’ globally for Mitsu Chem Plast Limited (hereafter referred to as MCPL).

‘Supplier’ here refers to suppliers/ service providers/ vendors/ traders / agents/ consultants/ contractors/ joint venture partners/ third parties including their employees, agents and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to MCPL or any of its subsidiaries, affiliates, divisions.

This Supplier Code of Conduct sets forth the basic requirements that we ask our Suppliers to respect and adhere to when conducting business with us. This Code embodies our commitment to internationally recognized standards, including the Core Conventions of the International Labour Organization (ILO), United Nations’ Universal Declaration of Human Rights, United Nations Global Compact Principles as well as prevalent industry standards, and all other relevant and applicable statutory requirements concerning Environment Protection, Minimum Wages, Child Labour, Anti-Bribery, Anti- Corruption, Health and Safety, whichever requirements impose the highest standards of conduct.

## **2.0 LABOUR & HUMAN RIGHTS:**

Our company expects its suppliers to provide safe and healthy working conditions for all employees, to treat all employees with dignity and respect, and to comply with all applicable labour laws and regulations. Suppliers are expected to ensure that their employees are not subject to any form of forced labour or human trafficking. This includes, but is not limited to, any instance of physical or emotional coercion, physical confinement, or withholding of wages or documentation. Suppliers are expected to provide fair working hours, compensation, and benefits, and to ensure that employees are not subjected to discrimination based on race, gender, religion, or any other protected status.

### **2.1 Adhering to all Labour Laws and Human Rights Laws, Suppliers shall:**

- **2.1.1** Comply with all applicable local, state and national laws regarding human rights.
- **2.1.2** Comply with the Company’s Human & Labour Rights Policy.
- **2.1.3** Ensure that all their employees are hired on their own free will and guarantee that all their operations are free from forced, bonded, compulsory, indentured, prison labour or any other form of compulsory labour and child labour.
- **2.1.4** Ensure that all its employees are provided equal employment opportunities, an environment conducive to their growth, free from any form of discrimination and harassment.

- **2.1.5** Ensure compliance with working hours and minimum wages prescribed by applicable laws and regulations.
- **2.1.6** Comply with all slavery and human trafficking laws. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices both internally and within their supply chains and other external business relationships.
- **2.1.7** Ensure that employees are not to be charged any fees or costs for recruitment, directly or indirectly;
- **2.1.8** Not confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation of any of its workers/ employees.

### **3.0 HEALTH, SAFETY & ENVIRONMENTAL SUSTAINABILITY:**

Our company believes in minimizing our environmental impact and encourages our suppliers to do the same.

**3.1** The Supplier shall provide its employees with a safe and healthy working environment and comply with all applicable laws and regulations regarding working conditions.

**3.2** Supplier shall follow all Environmental, Health and Safety and other operational policies of the Company while executing any work or contract at the company site.

**3.3** Suppliers are expected to comply with all relevant environmental regulations, standards, and policies, and to adopt practices that promote sustainable resource use, pollution prevention, and waste reduction.

**3.4** Suppliers are encouraged to seek out opportunities to reduce their greenhouse gas emissions, conserve energy, and promote the use of renewable resources.

### **4.0 BUSINESS INTEGRITY:**

#### **4.1 Anti-Bribery**

**4.1.1** The Supplier shall not, directly or through intermediaries, take any recourse to any unethical behavior (implicit or explicit), or offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private, including with any employee of MCPL.

- **4.1.1.1** More Specifically Shall not offer or accept bribe or use other means of obtaining undue or improper advantage, offer or accept any kickbacks, and shall not take any actions to violate or cause its business partners to violate any applicable anti-bribery laws and regulations including the Prevention of Corruption Act of India.

- **4.1.1.2** Shall not take any advantage of any family/ social/ political connections to obtain favorable treatment or for the advancement of business or obtaining any favors. Merit shall be the sole attribute of association. In case a supplier has family or any other relationship which may be construed as conflict of interest with one or more of our employees, the same shall be disclosed to us.

- **4.1.1.3** Shall not enter into a financial or any other relationship with our employee that creates any actual or potential conflict of interest for us. The Supplier is expected to report to us any situation where an employee or professional under contract with us may have an interest of any kind in the Supplier's business or any kind of economic ties with the Supplier.

- **4.1.1.4** Shall not offer any gift, hospitality or entertainment for the purpose of obtaining any advantage, order or undue favor.

#### **4.2 Unfair Trade Practices**

Supplier shall desist from any unfair or anti-competitive trade practices.

#### **5.0 REPORTING OF UNETHICAL PRACTICES AND GRIEVANCE ADDRESSAL MECHANISM:**

**5.1** The Supplier shall ensure that an effective grievance procedure has been established to ensure that any worker/ employee, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

**5.2** Suppliers shall also forthwith report any unethical activity or discrimination if practiced by any of our employee/other Suppliers as per our whistle-blower policy (available on the company website).

**5.3** In case of a grievance with MCPL, Supplier shall raise it with relevant authority. MCPL shall formally investigate and communicate the outcome within a reasonable time.

#### **6.0 INTELLECTUAL PROPERTY :**

**6.1** The Supplier shall take appropriate steps to safeguard and not infringe any our confidential and proprietary information/intellectual property/ technology which come to its knowledge during the course of its business relationship/ dealings with MCPL.

**6.2** In case of sub-contracting, sharing of confidential information should be made with the consent of MCPL.

#### **7.0 THIRD PARTY REPRESENTATION :**

**7.1** The Suppliers shall not be authorized to represent Mitsu Chem or to use our brands without the written permission of MCPL.

**7.2** Third parties and their employees who are authorized to represent us are expected to abide by the MCPL Code of Conduct & Business Ethics Policy in their interaction with, and on behalf of us including the



confidentiality of information shared with them and to sign a non-disclosure agreement to support confidentiality of information.

### **8.0 PROHIBITION ON INSIDER TRADING :**

**8.1** If the Supplier becomes aware of material, non-public information relating to MCPL or its business, it may not buy or sell our securities or engage in any other action to take advantage of that information, including passing that information on to others.

**8.2** In addition, if the Supplier becomes aware of material, non-public information about any other company, including our customers, suppliers, vendors or other business partners, that is obtained by virtue of the supplier's interaction with us, then the Supplier shall not buy or sell that company's securities or engage in any other action to take advantage of that information, including passing that information on to others.

### **9.0 PRODUCT QUALITY & RESPONSIBILITY:**

Supplier shall ensure that Products and services are delivered to meet the applicable Quality, Product safety and environmental specifications.

### **10.0 SUPPLIER' S COMPLIANCE COMMITMENT:**

**10.1** MCPL expects the Supplier to adhere to all applicable laws and regulations, tax obligations and in particular comply with this Code in letter and spirit. It is the Supplier's responsibility to read and understand the contents of this Code and our Code of Ethics. As a condition of doing business with us, the Supplier must comply with this Code and agree to uphold such values during its business association with us.

**10.2** The Supplier shall maintain adequate documentation to demonstrate compliance with the principles of this Code, provide support during the process and allow access to us to check compliance upon request with reasonable notice.

**10.3** The Supplier shall notify us regarding any known or suspected improper behavior by the Supplier relating to its dealings with us, or any known or suspected improper behavior by our employees.

#### **Conclusion:**

Our company is committed to promoting responsible and sustainable business practices throughout our operations and supply chain. We believe that our suppliers play a critical role in achieving these objectives and expect them to operate in a manner that protects the environment, respects human rights, and adheres to ethical business practices. We trust that our suppliers share our commitment to these values and look forward to building a strong and collaborative relationship with them.

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