

Supplier Code of Conduct - CBT

Haldia Petrochemicals Limited



Introduction

At Haldia Petrochemicals Limited (“HPL” or “we” or “our”), our suppliers are valued partners who play an essential role in our operations, and we are committed to fostering strong, mutually beneficial relationships with them. This supplier code of conduct (“our code” or “the code” or “this code”) applies to all our local, regional and global suppliers, including any suppliers, service providers, traders, agents, consultants, contractors, joint venture partners, subsidiaries and other third parties, as well as their employees, agents, and representatives who conduct business with HPL.

The purpose of this code is to outline the foundational expectations HPL holds for suppliers in their business dealings with us. These principles reflect HPL’s dedication to internationally recognized standards, prevailing industry standards and all relevant statutory requirements.

Key focus areas

Our supplier code of conduct outlines the standards and values that guide our partnerships. The key focus areas of our code are based on HPL's values, ESG pillars, the requirements of various ESG indices and reporting frameworks, and the United Nations Sustainable Development Goals (UNSDGs).

Focus area I: Data privacy

Data privacy within this code emphasizes the importance of protecting sensitive information, ensuring compliance with relevant data protection laws, and maintaining the confidentiality and integrity of data throughout its operation and value chain.

- Suppliers are required to comply with the relevant privacy and data protection laws and regulations in their respective countries of operation. This includes a strict prohibition on the sharing of HPL's data in all countries, regardless of the local laws governing data protection. Even if the supplier’s country of operation does not prohibit data leakage, either partially or fully, the protection of HPL’s data must still be maintained in accordance with the applicable laws and the terms stipulated in the Supply Agreement.
- Suppliers must safeguard HPL's confidential information and personal data, ensuring that unauthorized access or use is strictly prohibited and data is restricted and only used for performing the agreed upon purposes.
- Supplier representatives with access must comply with [HPL’s Data Privacy Policy](#).
- Suppliers must inform HPL of any instance of data breach within 24 hours upon discovery of the same to suchandan.chatterjee@hpl.co.in. Suppliers are expected to fully cooperate with

HPL and provide them with reasonable access to data processing facility, for conducting investigations into the reported data breach incident.

Focus area II: Ethical standards

In order to maintain high standards of ethical practices, all suppliers are expected to conduct their business in a fair manner and act with integrity. In order to maintain the same:

- Suppliers must comply with all applicable laws and regulations. Additionally, suppliers must adhere to the provisions of law as specified in the Supplier Agreement, which may not necessarily be the law of the supplier's country of operation, but the applicable law as stipulated in the supply agreement.
- Suppliers must treat everyone fairly, with dignity and respect.
- Suppliers must conduct business honestly and fairly with clients, customers, suppliers, and financial partners.
- Suppliers must not offer, give, or receive gifts, hospitality, or any other form of inducement that could influence or be perceived to influence business decisions.
- Suppliers must protect HPL's assets, including physical property, intellectual property, and financial resources, preventing theft, loss, or unauthorized access.
- Suppliers must uphold HPL's reputation by demonstrating integrity, adhering to high ethical standards, and ensuring their actions reflect positively on the company. They should communicate transparently, promptly address any concerns, and avoid actions that could harm HPL's public image or stakeholder trust, thereby reinforcing a strong brand identity rooted in accountability, quality, and respect for all stakeholders.
- Suppliers must keep personal political activities separate from HPL's business affairs.
- Suppliers must report any observed violations of legal and ethical standards.

Focus area III: Business integrity

In order to maintain high standards of ethical practices, all suppliers are expected to uphold integrity, avoid bribery and corruption, and maintain transparency to ensure trust and compliance with applicable laws and regulations.

- **Anti-bribery:** Suppliers must not engage in any form of unethical behaviour, whether directly or indirectly, or attempt to gain any improper or personal benefit to secure or maintain business or any advantage with third parties, including HPL employees. Specifically:
 - ✓ **Prohibition on bribery and kickbacks:** Suppliers must not offer, accept, or provide bribes, kickbacks, or any improper incentives to gain an unfair advantage. They shall refrain from any actions that would violate relevant anti-bribery laws and regulations.
 - ✓ **Avoidance of favouritism through personal connections:** Suppliers are prohibited from leveraging family, social, or political ties to gain preferential treatment, secure business benefits, or receive any special favours.
- **Anti-corruption:** Suppliers must uphold the highest standards of integrity and transparency in all business dealings. Engaging in any form of corrupt practices to gain an unfair advantage is strictly prohibited. Specifically:
 - ✓ **Prohibition of corrupt practices:** Suppliers shall not engage in any form of corruption, including but not limited to extortion, fraud, embezzlement, or manipulation, in order to influence or secure business dealings.
 - ✓ **Compliance with laws:** Suppliers are required to adhere to all relevant anti-corruption laws and regulations, including the Prevention of Corruption Act of India, and must ensure their employees, agents, and representatives do the same.
 - ✓ **Transparency and reporting:** Suppliers are expected to report any instances of suspected corruption or unethical practices related to HPL or its business partners. They should maintain transparent records of transactions to support ethical conduct and prevent corrupt practices.
- **Unfair Trade Practices:** Suppliers must refrain themselves from any unfair or anti-competitive trade practices.

Focus area IV: Health and safety

This clause requires suppliers to uphold high standards in occupational health and safety, ensuring safe working conditions and prioritization of well-being for all their employees and workers. To maintain the same:

- Suppliers must ensure a safe and healthy working environment for all employees, contractors, partners, and others who may be impacted by their operations. This includes full compliance with all applicable laws and regulations regarding workplace safety and working conditions.
- Suppliers are encouraged to track relevant safety-related metrics over time.

- Suppliers must provide job-related training to ensure employees are equipped with adequate knowledge about safety practices and procedures.

Focus area V: Human rights

Suppliers shall ensure compliance with all applicable local, state, and national laws regarding human rights and must adhere to relevant labour laws pertinent to their business operations. Additionally, suppliers are encouraged to align with the principles outlined in the United Nations Global Compact, the UN Universal Declaration of Human Rights, and the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, all in accordance with national laws and practices.

- **Discrimination & harassment:** Suppliers must refrain from any discriminatory or harassing behaviour based on race, colour, religion, national origin, citizenship, ancestry, gender, age, disability, marital status, or sexual orientation within HPL facilities or towards anyone at the workplace.
- **Sexual harassment:** Suppliers shall maintain a zero-tolerance policy for sexual harassment and ensure full compliance with the relevant laws and regulations
- **Child labour:** Suppliers shall prohibit from employing individuals below the legal age for work in any country or jurisdiction where they operate as per applicable laws of the country. If no such regulation is present, the minimum employment age shall be as per the international declarations and standards.
- **Forced labour:** Suppliers must not use any form of forced, bonded, or compulsory labour, nor engage in slavery or human trafficking.
- **Compensation and working hours:** Suppliers must adhere to national laws and regulations concerning working hours, wages, overtime, and employee benefits.
- **Freedom of Association:** Suppliers shall respect the right to freedom of association of their workers and collective bargaining.

Focus area VI: Environmental standards & sustainability

The environment standards and sustainability clause in this code reflects HPL's dedication to minimizing environmental impact and promoting sustainable practices. To maintain the same:

- Suppliers must adhere to all relevant environmental regulations in their respective countries of operation and encouraged to consistently monitor and assess their environmental performance.

- Suppliers are encouraged to practice the responsible use of natural resources, prioritize recycled materials and renewable energy, and integrate climate stewardship practices into their operations to support HPL's broader sustainability commitments.
- Suppliers are encouraged to establish performance targets and strategies to minimize negative impacts of material environmental aspects.

Third party representation

Suppliers are not permitted to represent HPL or use its brand without obtaining prior written consent.

Confidentiality & insider trading

We expect our suppliers to maintain data confidentiality. Suppliers must protect HPL's intellectual property and other confidential information and data. All information provided by HPL should only be used by the suppliers for their intended purpose, as determined and agreed upon by both HPL and the supplier. If the suppliers become aware of significant non-public information related to HPL or its operations, they are prohibited from taking any actions to benefit from that information, including sharing it with others.

Conflict of interest

This code prohibits any suppliers from engaging in activities that could lead to a conflict of interest. Suppliers are required to disclose all potential conflicts of interest, including those arising inadvertently from business or personal relationships with customers, suppliers, business associates, or competitors of HPL, or with other HPL employees. Supplier employees must not act on behalf of HPL in any transactions or business relationships.

Grievance mechanisms

- **CBT suppliers:** Any complaints and grievances, can be reported to suchandan.chatterjee@hpl.co.in

Enforcement

To ensure compliance with this code, HPL may, at its discretion, conduct self-assessment surveys, audits, or inspections, or may assign a third party to carry out these evaluations on its behalf. These assessments will involve a comprehensive review of internal standards, systems, processes, practices, and relevant reports to verify adherence to the code. In the event of non-compliance, HPL reserves the right to take appropriate corrective actions. These may include, but are not limited to, providing

capacity-building support to suppliers for implementing corrective measures, allowing a suitable timeframe for remedial actions, or terminating business relationships with non-compliant suppliers.

Revision

The code will be periodically reviewed to ensure its continued adequacy and relevance.

Acknowledgement

We hereby communicate our acknowledgement and acceptance of the provisions of this code to the respective point of contact in HPL.

Name of Supplier: _____

Authorized Signatory: _____

Date: _____