

## SUPPLIER CODE OF CONDUCT

### BALAJI AMINES LIMITED

#### VERSION CHANGE HISTORY

Version	Date	Approver	Brief Description
1.0	31.01.2024	Board of Directors	Supplier Code of Conduct

## TABLE OF CONTENTS

<b>S.N.</b>	<b>Particulars</b>	<b>Page No.</b>
<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>Ethics</b>	<b>3</b>
2.1	Fair Competition and Anti-Trust	3
2.2	Business Integrity	3
2.3	Public Disclosure	3
2.4	Conflict of Interest	3
2.5	Complaint Mechanism	3
2.6	Acceptance of Gifts	3
<b>3</b>	<b>Human Rights and Labour</b>	<b>4</b>
3.1	Child and Forced Labour	4
3.2	Non-discrimination and Harassment	4
3.3	Fair Treatment	4
3.4	Wages	4
<b>4</b>	<b>Environment, Health and Safety</b>	<b>4</b>
4.1	EHS Programs	4
4.2	Emergency Response	4
4.3	Waste and Emission	4
4.4	Restricted Substances	4
4.5	Environmental Impact	5
4.6	Adherence to Environmental Laws	5
<b>5</b>	<b>Sustainable Sourcing and Traceability</b>	<b>5</b>
<b>6</b>	<b>Management Systems</b>	<b>5</b>
6.1	Risk Assessment and Management	5
6.2	Training, Competency Building and Documentation	5
6.3	Assessment and Verification Audits	5
<b>7</b>	<b>Anti-Corruption and Bribery</b>	<b>5</b>
<b>8</b>	<b>Supplier Code of Conduct – Policy Issues and Amendments</b>	<b>5</b>

## **1 INTRODUCTION**

Balaji Amines Limited (“**BAL**”) is among the largest manufacturing company with focus on high quality aliphatic amines, speciality chemicals with strong customer relationships across the world. BAL is committed to sustainable chemistry and strives to attain leadership through introducing new products from time to time. Over the past three decades BAL laid a strong foundation that has been built on trust, technology, and sustainability.

This Supplier Code of Conduct (“**SCOC**”) is focused on ethical conduct of business with focus on fair ethical, integrity, environment, sustainability, governance and compliance to all applicable laws.

## **2 ETHICS**

All suppliers and value chain partners are expected to conduct themselves in an ethical manner which includes

### **2.1 Fair Competition and Anti-Trust**

All suppliers are required to compete fairly and comply with applicable anti-trust and competition laws.

### **2.2 Business Integrity**

All suppliers are to be transparent in all their transactions with BAL and not to be involved in any form of corruption, money laundering, and thereby maintain business integrity.

### **2.3 Public Disclosure**

All suppliers should not communicate with regard to BAL performance and are not to make any public posting of information with regard to agreement or purchase orders relating to BAL.

### **2.4 Conflict of Interest**

All suppliers have to avoid situations of conflict of interest between their interests and their obligation to BAL. Suppliers should notify any potential areas of conflict of interest to BAL.

### **2.5 Complaint Mechanism**

Supplier shall provide an anonymous complaint mechanism for whistle blowers to report concerns on potential unethical activities in workplace and must ensure confidentiality and retaliation against the persons who participate in such programs, in good faith.

### **2.6 Acceptance of Gifts**

Suppliers are not allowed to offer any kind of gifts, regardless of their value, to employees of BAL.

### **3 HUMAN RIGHTS AND LABOUR**

All suppliers are to adhere to human rights and treat people with respect and dignity which includes-

#### **3.1 Child and Forced Labour**

Suppliers are not allowed to use Child, bonded, indentured or involuntary prison labour either directly or indirectly.

#### **3.2 Non-discrimination and Harassment**

Suppliers should not discriminate based on race, color, age, gender, sexual orientation, religion, health status, HIV status, political affiliation or marital status in employment practices. Suppliers shall maintain conducive work environment and take measures to avoid any harassment, harsh or inhumane which shall include sexual harassment, sexual abuse, mental coercion etc.

#### **3.3 Fair Treatment**

Suppliers should treat employees in a humane manner, avoiding any kind of verbal or sexual abuse and shall respect the right of workers to associate freely and negotiate collectively as permitted by and in accordance with applicable law and regulation.

#### **3.4 Wages**

Suppliers shall pay wages for all hours worked complying with all applicable laws pertaining to minimum wages, overtime pay, leaves and legally mandated benefits.

### **4 ENVIRONMENT, HEALTH AND SAFETY**

All Suppliers should provide a safe and healthy working environment and shall-

#### **4.1 EHS Programs**

Organize programs to identify chemical and biological hazards in the workplace and take steps towards safety of employees.

#### **4.2 Emergency Response**

Evaluate possible emergency situations in the workplace and implement emergency response plans and train all employees to handle such possible emergencies.

#### **4.3 Waste and Emission**

Ensure safe handling, movement, storage, recycling, reuse and implement best practices in place for air water and waste emissions.

#### **4.4 Restricted Substances**

Ensure that the supplied products do not contain restricted or banned materials.

#### **4.5 Environmental Impact**

Use water, energy and other natural resources to minimize impact on the environment and climate through change in processes, material substitution, recycling and reduction of usage.

#### **4.6 Adherence to Environmental Laws**

Adhere to applicable environmental regulations and laws and keep in place systems to monitor the same.

### **5 SUSTAINABLE SOURCING AND TRACEABILITY**

All suppliers should adhere to the sustainable sourcing / procurement policy of BAL. Suppliers shall adhere to responsible sourcing and carry out due diligence on the sourcing of raw materials, ensure traceability of procured materials.

### **6 MANAGEMENT SYSTEMS**

All suppliers are expected to establish a management system to comply with the laws for business continuity and to mitigate operational risks which will include-

#### **6.1 Risk Assessment and Management**

Identify, determine and manage risks through policies and processes.

#### **6.2 Training, Competency Building and Documentation**

Establish competency building through employee training and demonstrate the same through appropriate documentation.

#### **6.3 Assessment and Verification Audits**

Ensure that verifiable systems are in place to be assessed by the BAL team.

### **7 ANTI-CORRUPTION AND BRIBERY**

Suppliers should educate and train their employees on anti-corruption and anti-bribery practices to ensure the best business practices.

### **8 SUPPLIER CODE OF CONDUCT - POLICY ISSUE AND AMENDMENTS**

This policy is issued by the Managing Director who has been tasked with the responsibility of providing strategic direction to the company in commercial aspects. The Managing Director will periodically review and amend this policy and ensure that it is consistent with changes in the regulatory environment.