



## Supplier Code of Conduct

We, at Welspun Enterprises Limited, are committed to provide a fair, humane, and healthy environment to the persons directly or indirectly involved in our projects. We expect similar principled conduct from our business partners in the supply chain. WEL's Supplier Code of Conduct sets out the requirements expected from the Suppliers and other business partners in the supply chain.

### Scope and Application

WEL's Supplier Code of Conduct is applicable to all our supplier, along with contractors, sub-contractors, business partners, or any other entity entrusted that provides goods and services to us. Further, all applicable regulations will be adhered to, based on the geography or supplier location.

This code of conduct is aligned with the principles of United Nations Global Compact (UNGC) principles, which provides environment and social guidelines with which companies align their supplier code of conduct. In particular, the UNGC principles encourage businesses to make sustainability a priority and extend it to its value chain.

### Environment

**Environment Management and Compliance:** We expect our suppliers to comply with existing environmental laws and have all necessary licenses, permits and other required approvals for continuing its operations.

We also expect all suppliers to have environment management systems in place through which they promote greater environmental responsibility, use of environmentally friendly technologies, and set environment related goals and measure their progress.

**Energy Conservation:** We expect our suppliers to monitor their energy use and take necessary steps to improve energy efficiency.

**Water management:** We expect our suppliers to develop water management strategies to track water consumption and wastewater disposal.

**Waste Management:** We expect our suppliers to embrace the principles of circular economy by reducing, reusing, recycling, and recovering waste materials generated in operations.

**Air Emissions:** We expect our suppliers to monitor, regulate and treat all air emissions of volatile organic compounds, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations.

**Responsible Sourcing:** Through supplier involvement, sustainable procurement strategy and the use of sustainable raw materials, we expect our suppliers to integrate sustainability into the supply chain.

**Hazardous Substances:** We require our suppliers to handle, store, and dispose chemicals and hazardous materials in an environmentally responsible manner and train workers on these procedures.

**Biodiversity:** We expect our suppliers to protect and conserve biodiversity in and around the project sites and work towards supporting the protection of places of concern and protected areas.

**Climate Change:** Our suppliers are expected to acknowledge climate change as a matter of global concern and undertake result-oriented climate actions to ensure resilience, adaptation, and mitigation.



## Social

### Prohibition of Child Labour

Suppliers must not, under any circumstances, use child labour as defined by National & Local laws and / or ILO Convention, whichever is more stringent. We, at Welspun, do not engage in or support the use of child labour. We ensure that no child labour is employed for the company's projects. Child Labour remediation Procedure has been developed to provide adequate financial and/or other support to enable the children to attend and remain in school until no longer a child, in case any child is found to be working in the business supply chain.

### Prohibition of Forced or Compulsory Labour

The use of forced, bonded, or indentured labour or involuntary prison labour is strictly prohibited. We, at Welspun, do not engage in or support the use of forced or compulsory labour including prison labour. Suppliers shall not retain original identification papers/documents and shall not require personnel to pay 'deposits' upon commencing employment. Neither the Supplier firm nor any entity supplying labour to them shall withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the organization. Personnel shall have the right to leave workplace after completing the standard workday and be free to terminate their employment.

### Health and Safety

Suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations, and industry standards. We, at Welspun, are committed to provide a safe and healthy workplace environment and take effective steps to prevent potential accidents and injury to workers' health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the workplace environment, and bearing in mind the prevailing knowledge of the industry and of any specific hazards.

### Freedom of Association & Collective Bargaining

Suppliers must respect the rights of employees to form and join any association and bargain collectively. The employees shall be free to join an organisation of their choice and that their doing so will not result in any negative consequences to them, or retaliation from the company. The company shall not in any way interfere with the establishment, its functioning, or administration of such organizations.

### Non-Discrimination

Suppliers shall strictly adhere to all applicable laws and regulations prohibiting discrimination in hiring and employment on the grounds of race, religion, age, nationality, colour, gender, sexual orientation, physical ability, health condition, political opinion, creed or other basis prohibited by law. We, at Welspun, do not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, political opinions, age, or any other condition that could give rise to discrimination.

### Fair Treatment

Suppliers must treat all its employees with dignity and respect. The company does not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of personnel. No harsh or inhumane treatment is allowed.



### Working Hours, Wages and Leave Benefits

We expect our suppliers to comply with all applicable laws and regulations on working hours, weekly rest day and public holidays. The normal work week, not including overtime, shall be defined by law but shall not exceed 48 hours. Personnel shall be provided with at least one day off following every six consecutive days of working. In addition, we expect our suppliers to comply with all applicable laws and regulations concerning wages and benefits. Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families. Deductions from wages as a disciplinary measure shall not be permitted unless authorized by applicable law.

### Safe Workplace

We expect our suppliers to provide:

- Clean drinking water and proper sanitisation facilities.
- A work environment that is compliant with all applicable safety laws and standards such as electrical and fire safety laws.

### Community Engagement

We encourage our suppliers to assist in the enhancement of the quality of life of the communities in and around the areas of operation with the goal of making them self-reliant.

### Governance

Welspun has a zero-tolerance policy towards any form of bribery and/or corruption. Suppliers of Welspun Enterprises should comply with all the relevant anti-bribery and anti-corruption laws including but not limited to the Indian Prevention of Corruption Act, 1988 (IPC) and other applicable laws governing corruption and bribery, whether public, commercial or both. Suppliers shall ensure highest standard of ethical and professional conduct in all their interactions and dealings with Welspun Enterprises Employees. The suppliers for obtaining contract/favourable treatment shall ensure and not do the following:

- a. Suppliers and or its employees may not directly or indirectly offer or give any bribe or kickbacks or any other improper payments in order to obtain or retain a business that can be perceived to obtain undue advantage in conduct of their business.
- b. Suppliers shall comply with all applicable anti-bribery laws of the geographies in which they operate. Supplier shall implement adequate policies and procedure to ensure compliance with Welspun Enterprises Anti-Bribery and Anti- Corruption policy
- c. Suppliers shall not offer any cash, gift, meals, entertainment, or other hospitality for the purpose of obtaining any improper benefit or advantage and are in compliance with Welspun Enterprises Anti-Bribery and Anti-Corruption policy
- d. Suppliers should not indulge in any business, monetary or any other transaction either directly with Welspun Enterprises employee or relatives that creates any conflict of interest for Welspun Enterprises. Suppliers should report to Welspun Enterprises of any situation where an employee of Welspun Enterprises may have an interest, either directly or indirectly, in the Supplier's business or economic ties with the Supplier.
- e. Suppliers shall not take any advantage (social/ political connections) to obtain favourable treatment from Welspun Enterprises. Any dealings or transactions with Welspun Enterprises shall be solely based on the merit, honesty, and integrity.
- f. Suppliers shall refrain from indulging in any anti-competitive or unfair trade practices.



## Accountability

We expect our suppliers to have a governance mechanism with identified personnel / team who will oversee and be accountable for the adherence of the WEL's Code of Conduct and ESG initiatives at the suppliers' end.

## Implementation of the policy

The revised code of conduct is effective from (xx/xx/xxxx). Suppliers must conduct regular/periodic internal assessments to assure their compliance with the aforesaid code of conduct. Welspun or any third party appointed by Welspun reserves the right to conduct inspections of suppliers and their facilities to verify compliance with the said code of conduct.

By accepting any purchase order or entering contract from Welspun Enterprises Limited, supplier / Supplier thereby acknowledges and certifies its compliance with the principles and requirements of the above-mentioned principles under this Code.

## Reporting of Concerns

It is the duty of the suppliers to report any violation or suspected violation of unethical conduct to Company. Should you suspect any actual or potential unethical or improper behaviour, you can report:

- a. By calling on Welspun Ethics Hotline number 000-800-9190-236 (Toll-free)
- b. Write to the Head Ethics of Welspun Enterprises either by email or post:

Head Ethics

Address: Welspun Enterprise Limited, BKT House, 8th Floor, C wing, Kamla Mills Compound, Senapati Bapat Marg, Lower Parel (W), Mumbai 400 013

Email: [whistleblower\\_wel@welspun.com](mailto:whistleblower_wel@welspun.com)

- c. A complaint can also be made by accessing the company website. The link to access the web site is: [www.welspun.ethicspoint.com](http://www.welspun.ethicspoint.com)

All complaints reported will be appropriately and fairly investigated and will be dealt with in confidence. For more details and guidance on reporting, you can refer to the Whistle-Blowing Policy of Welspun Enterprises. (uploaded on the Company website)

## Violations:

Any supplier who violates the Code may be liable for termination of the Contract. Welspun Enterprises may choose not to conduct business with suppliers who do not demonstrate high ethical standards, compliance with local laws and the Supplier Code.



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**Compliance declaration**

We, the undersigned herby confirm:

1. That we have received and taken due note of Welspun’s Supplier Code of Conduct and commit ourselves to fully comply with its principles and requirements.
2. That we agree that Welspun or a third party appointed by Welspun may carry out periodic, inspection/audit at our facilities to verify our compliance with the aforesaid Code of conduct.
3. That we effectively communicate the contents of this Code of conduct to our employees, agents, subcontractors, and suppliers and ensure all measures required are implemented accordingly.

Name (Authorized Signatory): .....

Position / Designation: .....

Supplier / Company Name: .....

Address: .....

Date: ..... Seal: .....

(Note: The Compliance Declaration must be signed by a duly authorized representative of the company and returned to the assigned Welspun contact within 15 working days of receipt).