

NOCIL Limited

Supplier Code of Conduct

ANAND V. S.
Managing Director

Reviewed and Amended by the Core Committee on 05.03.2025







Purpose

"We bring together chemistry, technology, proven expertise and trusted partnership to offer sustainable rubber chemicals and beyond" that is our vision and responsibility. Through our technologies, products, concepts, and innovations, we strive to make the most significant contribution to a sustainable future that promotes an improved quality of life for all individuals. Therefore, NOCIL aspires to integrate the best practices through its value chain. Suppliers play a crucial role in our business ecosystem and significantly contribute to NOCIL's growth. We remain committed to our ongoing efforts to uphold best practices throughout our value chain, and this policy serves to formalize our expectations for our suppliers.

It is of utmost importance to us to uphold the principles of sustainable development within our supply chain. We aim to collaborate with our suppliers to enhance their sustainability performance throughout our supply chain. NOCIL therefore gives preference to suppliers and service providers ("suppliers") that share our fundamental, social and environmental values.

Scope and Applicability

This policy is applicable to all providers of goods and services to NOCIL, encompassing suppliers, contractors, contract manufacturers, transporters, service providers with whom we maintain a contractual and commercial relationship. Furthermore, suppliers are anticipated to extend these principles to their subcontractors and third-party agents involved in delivering goods and services to NOCIL limited.

Supplier's compliance to this Code of Conduct

As our supplier ("You"), we obliged you to support, adopt, and implement the following ESG Standards, which are derived from international standards and guidelines for human rights, such as the International Labor Standards (ILO), OECD Guidelines for Multinational Enterprises, ISO 45001, ISO 14001, United Nations Global Compact, United Nations guiding Principles, United Nations Universal Declaration on Human Rights, United Nations against Corruption, and the global chemical industry's Responsible Care® program.

The supplier is required to send their confirmation of having read, understood and acknowledged the Supplier Code of Conduct. In the event of a breach of this Supplier Code of Conduct, NOCIL Ltd. reserves the right to take action against the supplier, which may include barring the supplier, requiring the supplier to take appropriate remedial action and/or terminating the business relationship. NOCIL shall be entitled to conduct audits at suppliers' premises, at its own expense, either remotely or also on site by NOCIL or third parties commissioned by NOCIL, in order to assess the measures taken to comply with this Supplier Code of Conduct. Each supplier undertakes to assist NOCIL in conducting such audits; in particular, it shall provide NOCIL with all documents and information required to conduct the audit and shall grant access to its premises.



Arvind Mafallat Group

NOCIL Supplier Code of Conduct Principles

1. Fundamental Employee rights and work practices

We expect our business partners to ensure fair treatment of their employees in accordance with applicable and relevant laws and regulations at all their facilities dealing with NOCIL. This includes the following issues in particular:

a. Minimum age for employment

NOCIL enforces a stringent 'No Child Labour' policy. Suppliers must not hire individuals below the legal working age as stipulated by local legislation. Additionally, Suppliers are obligated to comply with contracts established with NOCIL that include non-negotiable clauses against the employment of child labour.

b. Forced labour

Suppliers are prohibited from utilizing any form of forced or involuntary prison labour, bonded labour, or slave labour.

c. Abuse and harassment

Suppliers must refrain from employing corporal punishment or any other forms of physical or sexual harassment or abuse towards their employees.

d. Discrimination

Suppliers are not permitted to discriminate against individuals based on any condition or characteristic protected by relevant laws or regulations.

e. Freedom of association

Suppliers shall acknowledge and uphold each employee's right to join any legally recognized organization. The rights of labour unions and the principle of collective bargaining must be honoured.

f. Work hours, work-week, and payment of wages

Suppliers are expected to adhere to all relevant local laws and promote equal pay for work of equal value.

2. Ethical and Moral business standards

Suppliers are required to refrain from engaging in or condoning any form of corruption, extortion, or embezzlement. They must not provide or accept bribes or any illegal incentives from their business partners and are obligated to maintain precise records of their transactions with NOCIL and other partners. Additionally, suppliers must not present gifts to NOCIL employees that arise from their relationships with the suppliers. It is also imperative for suppliers to inform NOCIL of any circumstances that may lead to a conflict of interest involving any NOCIL employee that does not align with the company's best interests.







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3. Data protection of confidential information

Suppliers are responsible for safeguarding and appropriately utilizing confidential information, ensuring the protection of their business partners' privacy and legitimate intellectual property rights. They must treat all personal information pertaining to individuals, including NOCIL's consumers and employees, with the utmost respect for privacy, adhering to relevant privacy laws and regulations.

4. Occupational Health and Safety

Suppliers are responsible for ensuring that their workers are provided with safe, healthy, and hygienic working conditions to prevent accidents, occupational illnesses, and injuries that may arise from or be associated with their operations.

5. Environmental Protection

We expect our suppliers to pay close attention to protecting and safeguarding the environment and to use resources efficiently, avoiding use of SVHC (substance of very high concern, listed by the European Chemicals Agency ECHA) in the product and process, will apply energy-efficient and environmentally friendly technologies and reduce waste, as well as emissions to air, water and soil to minimize negative impact on biodiversity, climate change and water scarcity in carrying out business operations in accordance with applicable laws and regulations.

6. Legal and other requirements

Suppliers shall comply with all applicable laws, other requirements and regulations in providing goods and services to NOCIL including those related to international trade, export controls, data protection and anti-trust/competition laws.

7. Review

The Supplier code of conduct will be reviewed on an annual basis or in case of any significant changes to the principles of UNGC, ILO, or NOCIL's business strategy.

In event of any queries or clarifications regarding this Policy the following may be approached:

Mr. Shailesh Sangle - General Manager - Procurement

Email id: shailesh.sangle@nocil.com

If a supplier comes into knowledge of violations or deviations from the NOCIL's Supplier Code of Conduct in their own company or within the supply chain, these have to be reported immediately to NOCIL and remedial action must be initiated. NOCIL provides a grievance reporting channel for both internal and external parties. Any grievances can be escalated by contacting us at the following:







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Mr. P. Srinivasan – President Finance and CFO Email id: psrini@nocil.com

We expect our suppliers to maintain a grievance redressal mechanism open to all employees to report violations in this Supplier Code of Conduct. Reprisals against any people who utilize this reporting option are not permitted.

ANAND V. S.
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