

**Godfrey Phillips India Limited**  
Supplier Code of Conduct

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## **I. Introduction**

Godfrey Phillips India Limited (hereinafter referred to as “GPIL” or “the Company”) and its subsidiaries, endeavour to conduct its business in an ethical, transparent, and sustainable manner to ensure the long-term growth of the Company and value creation for its stakeholders. Suppliers are one of its important stakeholders. Therefore, it aspires to integrate the sustainability principles across the supply chain and aim to nurture long-term strategic partnerships in ensuring business sustainability. Supplier Code of Conduct (hereinafter referred to as “Code of Conduct” or “Code”) is an attempt to formalize its commitment to promote sustainability across the supply chain.

## **II. Scope and Applicability**

The applicability of this Code extends to all the Suppliers who directly provide services, raw materials, finished goods or supply other products (hereinafter referred to as “Suppliers”) to GPIL and its subsidiaries.

Therefore, all the Suppliers are encouraged to comply with this Code of Conduct formulated by the Company.

## **III. Supplier's Compliance to Policy**

This Code is aligned with the principles and best practices followed across the industries. Therefore, Suppliers are encouraged to follow these principles and practices outlined in the Code.

## **IV. Ethics and Compliance with Laws**

### **a. Conflict of Interest**

Suppliers, while conducting business, shall use good judgement and avoid any situations or circumstances which may cause a conflict between the Company's and Supplier's interest. Conflict of interest may undermine the trust placed by GPIL on the Suppliers. Therefore, Suppliers must take proactive actions to address any potential cause of conflict of interest.

### **b. Fair Business, Advertising, and Competition**

Suppliers are required to adhere to the standard of fair business, advertising and competition and under no circumstances shall engage in any activities related to price fixing, collusion, and/or unfair trade practices in violation of applicable antitrust laws.

### **c. Statutory Compliance**

Suppliers are required to comply with all the statutory laws, rules and regulations as per the applicable national guidelines. They shall maintain a record of all licenses, permits, approvals, etc. and must furnish copies of the same whenever requested by GPIL.

### **d. Anti-corruption and Bribery Practices**

Suppliers shall promote and maintain highest standards of moral and ethical conduct while conducting business with GPIL. Pursuant to this, they shall not indulge in any corrupt practices as defined under any applicable laws, rules and regulations such as Prevention of Money Laundering Act, 2002, Prevention of Corruption Act, 1988, etc. Adequate actions shall be taken to eliminate corrupt practices

in any form such as bribery, fraud, cheating or any other practice considered illegitimate and shall educate their employees with dedicated awareness programs.

**e. Confidentiality**

Suppliers shall ensure the protection of any sensitive and/or confidential information that it has been exposed to due to business relationship with GPIL; they shall not share any information of confidential nature with any unauthorized individual or organisation and/or prospective customers in any form. They shall ensure that all their employees or anyone else performing the tasks on their behalf shall also comply with this provision by providing proper awareness to them.

GPIL's confidential information includes, but is not limited to any proprietary information, employee information, personal data, and third-party information in GPIL's custody as shared by GPIL.

**V. Human Rights and Labour**

**a. Protection of Human Rights**

Suppliers are advised and encouraged to support and respect the protection of internationally recognized human rights concerns such as modern slavery, child labour, human trafficking, etc.

**b. Local Communities**

It is recommended Suppliers shall minimize or eliminate adverse impacts on local communities around their business operations. Suppliers are advised to undertake stakeholder consultations to identify the needs and understand grievances of the local communities. Suppliers are also encouraged to work towards socio-economic upliftment of the local communities.

**c. Protection of Humane Culture**

Suppliers are advised to ensure dignified and respectful treatment of all within their workplace and must take corrective/preventive actions towards any instances of harassment, including verbal, psychological and sexual abuse, the use of threats of violence and/ or sexual exploitation and abuse by any of their employees, contractors, and parent Company and / or business associates. Suppliers are encouraged to bring awareness and communicate with employees/ workers to ensure a dignified and respectful workplace and provide grievance redressal mechanisms to address any concerns raised by their employees.

**d. Wages, Working Hours and Benefits**

Suppliers shall ensure that their employees are paid in alignment with applicable laws, rules or regulations.

**e. Child Labour**

Suppliers shall prohibit employment of children below 18 years of age, or under the minimum age for employment in the country, whichever is greater. Established systems and processes by the Suppliers are expected to be in place to verify the identity and age of their employees through verification of nationally accepted documents.

**f. Forced and Compulsory Labour**

Suppliers shall not practice any form of forced and compulsory labour. Suppliers shall comply with all slavery and human trafficking laws (Modern Slavery Act) and must ensure that adequate steps have been taken by them to eliminate modern slavery and human trafficking practices. Suppliers are advised

to develop and adopt practices to identify and take prompt corrective actions in any such instances. Moreover, Suppliers shall not confiscate or withhold worker identity documents including work permits and travel documentation of any of its workers/ employees.

**g. Non-discrimination**

Suppliers shall eliminate all forms of discrimination at the workplace on grounds of race, caste, economic background, colour, age, gender, orientation, religion, ethnicity, nationality, disability, marital status, or any such grounds as may be recognized under the applicable national laws as discriminatory.

**VI. Freedom of Association and Collective Bargaining**

GPIL encourages its Suppliers to respect and recognize the rights of its employees to freely associate and organize. Adequate steps shall be taken by them to promote fair working conditions as guided by international conventions as applicable.

**VII. Freedom of Speech and Expression**

Suppliers shall ensure an enabling environment in which all their employees have the fundamental right to freedom of speech and expressions.

**VIII. Health and Safety**

Suppliers shall provide their employees a healthy and safe workplace to ensure productivity, physical and mental wellbeing. Suppliers are expected to be compliant with all applicable health and safety laws, regulations and practices and must furnish copies of the same whenever requested by GPIL.

Suppliers must take adequate steps to minimize hazards which may be inherent in their work environment by having processes in place and requirements such as occupational safety, emergency preparedness, machine safeguarding, etc. Suppliers are encouraged to share best practices among their employees through regular trainings on occupational health and safety.

**IX. Environment**

Suppliers are encouraged to comply with disclosure of environmental parameters such as air emissions (including GHG and other emissions), energy use, water use, waste, and biodiversity as per regulations and norms as specified by the appropriate regulatory authorities.

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**X. Training and Awareness Programs**

GPIL may conduct trainings/sensitizations among its Suppliers to share best practices being followed by industry leaders and give an opportunity to Suppliers to showcase their practices. Selected Suppliers will be expected to participate in these trainings.

**XI. Reporting Concerns**

GPIL's endeavour is to foster an environment of open and honest communication with its Suppliers. The Supplier is assured that an effective grievance procedure has been established within GPIL to ensure that they may submit a grievance without suffering any prejudice or retaliation of any kind.

All reporting of grievances will be treated in a confidential manner and in the highest ethical regard. In case of any potential violation or related queries please refer to the Grievance Redressal Policy and Whistleblower Policy on the [www.godfreyphillips.co.in](http://www.godfreyphillips.co.in)

In case any violation of this Code is identified, the Supplier, at GPIL's discretion, would be given time to remediate the problem, with assistance from GPIL wherever possible. If the problem is not effectively addressed and within a clear agreed timeframe which is acceptable to GPIL, then GPIL reserves the right to terminate its business relationship with the violating Supplier.

## **XII. Suppliers Commitment**

The Policy will be available on relevant mediums of communication like corporate website [www.godfreyphillips.co.in](http://www.godfreyphillips.co.in), and efforts will be made on communicating this Policy directly to all Suppliers engaged with GPIL.

By accepting this Code of Conduct, it is implied that the Suppliers will ensure compliance of this Code. The Supplier is required to send its formal and signed confirmation of having read, understood, and acknowledged the Code of Conduct.

## **XIII. Review**

The Code of Conduct will be reviewed by the Head of Commercial and Head of Supply Chain, annually in accordance with regulations or GPIL's business strategy.

## **XIV. Version History**

Version	Change Description	Date
1.0	New policy drafted	27/05/2023
1.1	Additions on disclosure under environment, mediums of communication.	11/11/2024