

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 their 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 aims 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 formalise 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 with 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 interests. Conflict of interest may undermine the trust placed by GPIL in its 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 the highest standards of moral and ethical conduct in their business dealings with GPIL. Pursuant to this, they shall not indulge in any corrupt practices as defined

under any applicable laws, rules and regulations, such as the 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 a business relationship with GPIL; they shall not share any information of a confidential nature with any unauthorised 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 recognised human rights concerns, such as modern slavery, child labour, human trafficking, etc.

b. Local Communities

It is recommended that Suppliers minimise or eliminate adverse impacts on local communities around their business operations. Suppliers are advised to undertake stakeholder consultations to identify the needs and understand the grievances of the local communities. Suppliers are also encouraged to work towards the 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 recognised under the applicable national laws as discriminatory.

VI. Freedom of Association and Collective Bargaining

GPIL encourages its Suppliers to respect and recognise the rights of its employees to freely associate and organise. 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 with a healthy and safe workplace to ensure productivity, physical and mental well-being. 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 minimise 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 training on occupational health and safety.

IX. Environment

Suppliers are encouraged to comply with disclosure requirements and conduct their activities in accordance with relevant regulations and norms specified by appropriate regulatory authorities for environmental parameters, including air emissions (GHG and other emissions), energy use, water use, waste management, pollution prevention, and biodiversity protection.

X. Training and Awareness Programs

GPIL may conduct trainings/sensitisations 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

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 the corporate website www.godfreyphillips.co.in, and efforts will be made to communicate 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 annually in accordance with regulations or GPIL's business strategy by the Heads of Procurement and Supply Chain functions, along with the Chief Financial Officer and Functional Chief Executive Officer cum Whole-time Director on the Board of GPIL.

XIV. Version History

Version	Change Description	Date
1.0	New policy drafted	27/05/2023
1.1	Additions on disclosure under the environment, mediums of communication.	11/11/2024
1.2	Addition of pollution prevention and conduct of business activities in alignment with the environmental regulations and members for review	15/01/2026