



CENTURY ENKA LIMITED

SUPPLIERS CODE OF CONDUCT

DOCUMENT CONTROL

Document version

This Code named as 'Suppliers Code of Conduct' is version 1.0.

Preparation/Revision history

Sr. No.	Date of preparation / modification	Version No.	Modified by	Reviewed and approved by
1.	18.05.2023	1.0	Commercial Department	Board of Directors

Issuing Authority

The Suppliers Code of Conduct ('this Code') is approved by the Board of Directors ('the Board') of Century Enka Limited ('the Company').

Author and Responsible Official

This Code is to be maintained and updated by way of additions, deletions, and modifications, only by the Commercial Department. In case of any additions, deletions and modifications, this Code shall be reviewed by the Managing Director and subsequently approved by the Board.

Whenever this Code is amended, the version increases by one unit and the version is to be mentioned in the Document Control section.

Applicability and Usage

This Code is applicable to suppliers of all business units of the Company.

INTRODUCTION

The Company is fully committed to conduct its business in an ethical, legal and socially responsible manner. As a part of the Company's long term sustainability approach, its Suppliers are expected to adhere to this Code in true letter and spirit while doing business with the Company.

KEY PRINCIPLES

I. Business Ethics

Suppliers are expected to conduct their business in accordance with the highest standards of ethical behaviour. Supplier shall not engage in any activity of corruption, bribery, money-laundering, embezzlement, extortion, fraud, mismanagement, wilful misuse of power or wilful misuse of discretion and shall have 'zero tolerance' approach to such behaviour.

II. Statutory Compliance

Suppliers shall comply with all the applicable statutory laws in force. Suppliers shall also ensure to keep records for such statutory compliances, permits, licences, approvals necessary to conduct its business and upon request, furnish copies of the same to the Company. Suppliers shall not engage in collusive bidding, price fixing, price discrimination or other form of unfair trade practices in violation of anti-trust laws.

III. Freedom of Association and Collective Bargaining

Suppliers are expected to recognize the freely exercised right of workers, without distinction, to organize, defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

IV. Fair Treatment

Suppliers shall treat its employees fairly with dignity and respect without any discrimination. Suppliers must ensure that its employees are not subject to violation of human rights, including but not limited to sexual harassment, mental or physical coercion, verbal abuse and unreasonable restrictions.

V. Conflict of Interest

Suppliers are expected to inform us of any situation that may appear as a conflict of interest, and disclose if any of our personnel, officials, staff or professionals under any contract with the Company may have an interest of any kind in the supplier's business or any kind of economic ties with the suppliers.

VI. Gifts & Hospitality

Suppliers are expected to refrain from offering any benefit such as free goods or services, employment, or sales opportunity to our staff member in order to facilitate the suppliers' business with the Company. We shall not accept any gift or any offer of hospitality such as invitations to sporting or cultural events, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners other than the gifts or other corporate facilities of nominal value which are customary to a particular business transaction and required ordinary during the course of business.

VII. Ethical Business

Suppliers shall comply with relevant anti-trust and competition laws at all times and not indulge in any anti-competitive practices whether by itself or in combination with other entities.

VIII. Right to Privacy

Suppliers will safeguard and make only appropriate use of confidential information gained in the course of business and protect the interests of the Company. Suppliers shall recognize its employees' rights to privacy and personal dignity. Suppliers shall ensure that all employees' and business partners valid intellectual property rights are not compromised.

IX. Forced & Compulsory Labour and Child Labour

Suppliers shall prohibit all forms of forced or compulsory labour. Suppliers shall ensure fair remuneration and working hours set forth by applicable laws of the land. Suppliers shall not employ child labour.

X. Health & Safety

Suppliers are expected to provide safe and healthy working environment to the workforce. Suppliers shall provide appropriate controls, safe work procedures, preventive maintenance and necessary protective gear to mitigate health and safety risks in workplace.

Suppliers shall conduct periodic inspections, reviews and corrective measures to improve occupational health and safety while dealing with hazardous material. The Supplier shall promote and create awareness of healthy working conditions, maintaining hygiene, safety and emergency handling measure for its employees and contractors.

XI. Environment

Suppliers shall have necessary systems to minimize the impact of its operations and products on the environment and maintain strict compliance with government regulations. Suppliers shall ensure continuous improvements in environmental protection, specifically with respect to waste, usage of water, energy and other

natural resources, gas emissions, effluent treatment and disposal of hazardous materials.

Suppliers shall take necessary steps to minimize their impact on ecosystem and contribute towards restoration and preservation of biodiversity.

XII. Compliance with ESG Standards

Suppliers are expected to comply with applicable laws and to adhere to recognized environmental, social & governance standards (ESG standards). We also expect our suppliers to use their best efforts to implement applicable standards including sustainable procurement with their suppliers and sub-contractors. Critical Suppliers are expected to take yearly targets on ESG and share the progress with the Company every year.

DISSEMINATION

This Code shall be disclosed on the website of the Company for accessibility to stakeholders of the Company and reference or web-link of this Code, may be disclosed in the Annual Report & other reports of the Company.

INTERPRETATION OR MODIFICATION

The Board of the Company shall have authority to amend or modify this Code, to align with any amendments made to the SEBI Regulations, the Companies Act, 2013, National & International conventions/directives/principles/standards or such other circulars, guidelines, standards or regulations issued by any statutory or regulatory authority or as and when deemed fit.

In the event of inconsistency of this Code with any statutory provisions, then the relevant provisions of such applicable law shall prevail upon the provisions of this Code.

ENFORCEMENT

To ensure compliance of this Code, the Company may periodically carry out self-assessment surveys, audits and/or inspection.

In case any violation of this Code is noticed, the Company, may at its discretion, allow time to remediate the violation(s), and if such violation(s) is/are not remedied to the satisfaction of the Company within the given timeframe, the Company may terminate business relationship with such violating Supplier.

All the critical suppliers of the Company required to certify the compliance with this Code at all times as under:

Compliance Undertaking

The undersigned supplier hereby certifies that he/she/they has/have read, understand, and agrees to comply with this Code at all times as stated hereinabove:

Name of Supplier along with name of
Authorised Signatory:

Signature of Authorised Signatory:

Seal of the Supplier with date: