



**WITMANS INDUSTRIES PVT. LTD.<sup>®</sup>**  
Lubricating The Growth

## SUPPLIER CODE OF CONDUCT

**DOC. #: WIPL-IMS-MNG-MN-03**

(BASED ON ISO 9001: 2015, ISO 14001: 2015 & ISO 45001: 2018)

**Rev. 01**

**Issue # 01**

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Prepared & Reviewed By



Approved By



**WITMANS INDUSTRIES PVT. LTD.**  
Lubricating The Growth

**INTEGRATED MANAGEMENT SYSTEM**

**Document Name:** Supplier Code of Conduct

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**DOCUMENT REVISION HISTORY**

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### Philosophy

WITMANS's philosophy is built on a rich legacy of fair and transparent governance and disclosure practices, many of which were in existence even before they were mandated by legislation on corporate governance. The Company's essential character revolves around values based on transparency, integrity, professionalism, and accountability.

WITMANS is committed to seeking sustainable growth by integrating Environment, Social and Governance (ESG) principles with its businesses and when managing relationships with the value chain. The Company encourages its suppliers, who are a part of the value chain, to carry out their activities responsibly while complying to all national and international laws applicable at any given time. Furthermore, WITMANS expects and urges its suppliers to introduce suitable processes, functions and management systems within their organisations that support such compliance and drive continuous improvement with regards to the requirements included in the Code of Conduct.

### Purpose

In line with its philosophy, WITMANS fosters responsible behaviour in its supply chain, in accordance with the highest standards of ethics and integrity, respect for the law, human and labour rights, and environmental stewardship. WITMANS upholds in letter and in spirit the United Nations Universal Declaration on Human Rights, the fundamental Human Rights Conventions of International Labour Organisation (ILO) and Sustainable Development Goals (SDGs). We intend to adopt Global Reporting Initiative (GRI) standards, Integrated Reporting (IR) and Business Responsibility and Sustainability Reporting (BRSR) frameworks in times to come.

This Supplier Code of Conduct (hereinafter referred to as the "Sup-CoC") shall guide all suppliers to engage in ethical, responsible, and legal business practices in their operations and adhere to ESG standards. WITMANS expects the suppliers to comply with all applicable regulatory requirements and implement policies and procedures, and provide training, as deemed necessary within their organisation. This Sup-CoC has been developed considering the current national and international laws, policies, regulations and global standards.





### Scope for Application

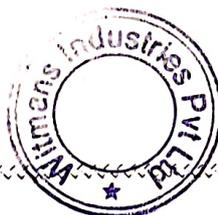
The Code extends to all suppliers who do business with WITMANS and includes contractors, sub-contractors, vendors, consultants, agents, business partners, collaborators and others that work for or supply goods and services to WITMANS, including their personnel (employees or sub-contractors). Suppliers shall include a company/firm/proprietor or any of its directors, officers, employees, representatives, agents, affiliates or other persons acting on behalf of the company/ firm/proprietor or any of its affiliates.

### Implementation of Code of Conduct

1. Suppliers are required to adhere to the Sup-CoC and are expected to self-monitor and demonstrate their compliance with this Code.
2. By adopting this Sup-CoC, the suppliers undertake to abide by and implement all the principles to their best knowledge and efforts.
3. WITMANS reserves the right to carry out due diligence, audit and inspection of its suppliers, who must cooperate in the process. Such suppliers are also urged to conduct similar due diligence of their suppliers, contractors and affiliates to enable compliance throughout their supply chain.
4. Any noncompliance by the supplier will constitute a breach of its contractual obligations. In the event of any breach of Sup-CoC, WITMANS reserves the right to take appropriate action including termination of existing contractual relationship and/or removal/suspension of any supplier who is in breach or violates any provisions of this Sup-CoC. In the event of the above, WITMANS shall not be liable for cost, expenses or damages of any kind as a result of exercising its right as mentioned herein above. Supplier will indemnify WITMANS with regard to any government or third-party investigations related to or arising out of suppliers alleged violation of this Code.
5. Suppliers shall promptly inform WITMANS when any circumstance arises that causes them to operate in violation of this Sup-CoC. They should also agree on the corrective measures to be taken.

### Reporting on Breaches

WITMANS expects the suppliers to report in good faith any potential or actual violation of this Sup-CoC, laws, regulations or ethical or professional standards. Unless prohibited by law or regulation, WITMANS expects the suppliers to raise concerns related to this Sup-





CoC by making a protected and confidential disclosure through the reporting channels mentioned in WITMANS's Whistle Blower Policy.

WITMANS will review/investigate any concerns raised and discuss findings/escalate with the supplier as appropriate. If remediation is required, the supplier will devise and inform WITMANS of their corrective actions and implementation plan to resolve the breach effectively and promptly.

Reported violations will be treated with confidentiality as per WITMANS's Whistle Blower Policy.

### Compliance

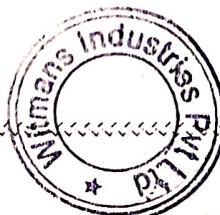
WITMANS expects suppliers including their personnel (employees or sub-contractors) to support, embrace and enact the following Code of Conduct (Sup-CoC), apart from complying with all national and international regulations and laws that are applicable at any given time.

WITMANS encourages its suppliers to go beyond compliance and embrace the principles of sustainability. WITMANS shall incorporate regulatory compliance and ESG performance as key criteria based on requirements as stated in the Code during evaluation of the suppliers.

### Promote Environmental Sustainability

All suppliers support a precautionary approach to environmental issues and undertake initiatives to promote better environmental responsibility. To this end, suppliers will;

1. Reduce resource consumption and conserve natural resources:
  - 1.1. Conduct all operations, sourcing, manufacture, distribution of products and the supply of services with the aim of protecting and preserving the environment.
  - 1.2. Use natural resources rationally and work towards reducing resource consumption (water, energy, fuel, electricity, other materials etc.) and GHG emissions.
  - 1.3. Identify environmental risks and set up appropriate prevention measures.
2. Prevent pollution and reduce waste generation
  - 2.1. Maintain all required official permits, licenses and registrations.
  - 2.2. Prevent contamination, limit waste generation, and avoid or minimise adverse impact on the environment and biodiversity by facilitating reusing and recycling material.
  - 2.3. Clearly monitor the precautions to be taken during operations & maintenance in case of emission of heat, vibrations, radioactive rays, noise or similar.
  - 2.4. Use only those chemicals and aerosols with very low or zero ODP (Ozone Depletion Potential), which are allowed as per the regulatory provisions.
  - 2.5. Ensure that all the chemical and hazardous substances are accompanied by the manufacturer MSDS (Material Safety Data Sheet) during transport, storage, use





and disposal, and that instructions mandated be strictly followed. No chemical and hazardous substance shall be received without a MSDS document. All the applicable regulatory guidelines shall be adhered strictly for the procurement, transport, storage, use and disposal of such harmful and hazardous chemicals.

- 2.6. Provide written instructions about handling and/or disposal of equipment and product during the life cycle if special handling is required.

### Commitment to Human Rights, Labour and the Society

Suppliers shall support, respect and protect human and labour rights and make sure their organisation/entity is not complicit in any kind of abuses and/or violations. In this regard, the suppliers must:

1. Fair working conditions

- 1.1. Provide and maintain healthy and safe working conditions and welfare facilities for the employees in its establishment.
- 1.2. Ensure that that wages and benefits of their employees and subcontractors are fair and comply with applicable national and local laws as well as with contractual agreements.
- 1.3. Provide all workers, both permanent and non-permanent, with employment documents that are freely agreed to and which respect their legal and contractual rights.

2. Health & Safety

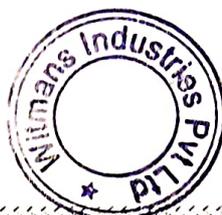
Ensure that the activities of suppliers do not harm the health and safety of their own employees, suppliers and subcontractors, local communities/population, and finally the users of its products and services, which is in accordance with the WITMANS's Mission Zero Harm in Health and Safety.

3. Child Labour

- 3.1. No person below 18 years shall be employed or permitted to work in any occupation or process.
- 3.2. Zero tolerance for any kind of child labour in their establishments and supply chain.

4. Forced Labour

- 4.1. Under no circumstance shall suppliers use forced labour, whether in form of compulsory or trafficked labour, indentured labour, bonded labour or other forms, through direct or indirect use of force and/or intimidation.
- 4.2. Any kind of slavery, mental and physical coercion, human trafficking and debt bondage in the supply chain shall not be tolerated.





## 5. Wages and Working hours

- 5.1. Ensure that all applicable regulations related to wages, overtime compensation and other legally mandated benefits of their employees and subcontractors are fair and comply with applicable national and local laws as well as with contractual agreements.
- 5.2. Ensure that maximum working hours laid down in the respective country are adhered to.

## Non-Discrimination and Equal opportunity

1. Commit, within the scope of prevailing laws and statutes, to oppose all forms of discrimination.
2. Maintain a work environment free from any form of discrimination and harassment.
3. Refrain from discrimination in hiring and employment practices on grounds of skin colour, age, caste, gender, race, ethnicity, nationality, socio-economic background, physical or mental disability, religion, sexual orientation, marital status, pregnancy, dependents, political or religious opinion, ideology, union membership and personal or social circumstances. Special attention must be paid to the rights of workers most vulnerable to discrimination.

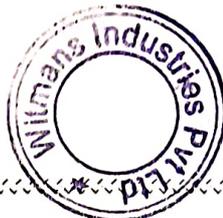
## Zero Tolerance towards Harassment

1. Treat all employees with respect and dignity and furthermore ensure that their own suppliers treat their employees in the same manner.
2. No tolerance towards unacceptable treatment of employees, such as physical punishment or torture, sexual harassment<sup>3</sup>, or abuse, mental or physical coercion or verbal abuse, or the threat of any such treatment.
3. No worker should be subjected to any physical, sexual, psychological, or verbal harassment, abuse or other form of intimidation.

## Ethical Integrity and Legality

Suppliers shall demonstrate the highest standard of integrity, ethics, and business conduct.

1. Compliance with Applicable laws and regulations:
  - 1.1. All activities must be carried out in compliance with the legislation that is applicable in the countries in which the suppliers operate.
  - 1.2. All other applicable international laws and regulations must be complied with, including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and antitrust/competition laws.
  - 1.3. Avoid any conduct that could tarnish or damage the reputation of WITMANS.





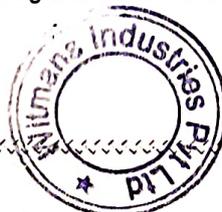
## 2. Anti-Corruption & Anti Bribery

- 2.1. All forms of bribery and corruption are prohibited
- 2.2. Adequate measures and procedures should be in place to prevent bribery in all commercial dealings.
- 2.3. Maintain a policy of 'Zero Tolerance' of any practice that may be deemed to be corruption, either active or passive.
- 2.4. No tolerance for unacceptable conduct, which includes, but not limited to, non-compliance with anti-corruption laws and, directly or indirectly offering, promising, hiring or authorizing payments in cash or in kind to any WITMANS employee, public official or any other person or entity, with intention of a) obtaining or retaining business b) Influencing business decisions; and/or c) securing an unfair advantage.

### Conflict of Interest

1. All and any conflict of interest in any business dealings with WITMANS, of which the suppliers are aware, should be declared to WITMANS so that appropriate action can be taken.
2. Avoid a situation where there is a real or potential conflict of interest with WITMANS employees, or with their family or closely associated persons, that could affect the independence or objectivity of their professional actions or decisions. If avoidance is not possible, the suppliers should inform WITMANS of the situation so that appropriate action can be taken.

WITMANS is committed to reviewing its Supplier Code of Conduct to evaluate its effectiveness and relevance from time to time. This review allows us to adapt to evolving sustainability standards, identify opportunities for improvement, and ensure that our procurement practices align seamlessly with our commitment to environmental and social responsibility. By consistently fine-tuning our approach, we aim to not only meet but exceed sustainability objectives while maximizing the value we deliver to our stakeholders





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**Declaration of Compliance to WITMANS Code of Conduct**

To,  
Procurement Head  
Witmans Industries Pvt. Ltd.  
Mumbai 400064

**Sub: Declaration of Compliance to WITMANS Code of Conduct**

I / We hereby confirm that I / We have read and understood WITMANS Code of Conduct for Suppliers and undertake to comply with same and all applicable laws / statutes / directives or regulations. I / We undertake to comply with the Code of Conduct in letter and in spirit.

I / We agree that these clauses / provisions or amendment, if any, form an integrated part of any or all WITMANS's purchase order or work order or agreement / contract. I / We confirm and uphold similar values as enshrined in this Sup-CoC and accordingly conduct my / our business operations.

I / We shall promptly notify an actual or potential breach and provide all information in this regard as per the provisions of Sup-CoC. I / We shall promptly take all remedial actions as required to comply with Sup-CoC. In the event of any failure to notify such breach or take such remedial measures, WITMANS will be entitled to take appropriate action, including termination of existing contractual relationship / agreement / purchase order / work order / agreement / contract, if any or any other business transactions without any liability or obligation for cost, expenses or damages of any kind as a result of exercising its right as mentioned herein above towards me / us and WITMANS in its sole discretion, may remove / suspend me / us as supplier.

We also allow WITMANS to conduct due diligence / audit / inspection and assure cooperation in the process.

I / We state that none of our activities are / have been conducted in violation of the Code of Conduct except the following:

Please mention short description of the violation(s) with current status.

in case you have nothing to report please mention 'Nil' in this box

Name of Company/ Entity: \_\_\_\_\_

Name & Designation of Authorised Signatory: \_\_\_\_\_

Place: \_\_\_\_\_

Date: \_\_\_\_\_

Signature & Seal \_\_\_\_\_

Supplier's Registration Number (Vendor Code) \_\_\_\_\_

