



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

# SUSTAINABLE PROCUREMENT POLICY DOCUMENT

**DOC. #: WIPL-IMS-MNG-MN-02**

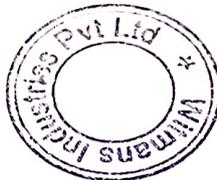
(BASED ON ISO 9001: 2015, ISO 14001: 2015 & ISO 45001: 2018)

**Rev. 01**

**Issue # 01**

**Issue Date**  
**01-05-2025**

Prepared & Reviewed By



Approved By



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

**INTEGRATED MANAGEMENT SYSTEM**

**Document Name:** Sustainable Procurement Policy Document

**Document No.:** WIPL-IMS-MNG-MN-02

Rev. #  
**01**

Issue #  
**01**

Issue Date:  
**01.05.2025**

Page  
**2 of 8**

**DOCUMENT REVISION HISTORY**

| Revision No. | Date       | DESCRIPTION OF CHANGES | Pages Affected | By |
|--------------|------------|------------------------|----------------|----|
| 01           | 01.05.2025 | First Revision         | -              |    |
| 02           |            |                        |                |    |
| 03           |            |                        |                |    |
| 04           |            |                        |                |    |
| 05           |            |                        |                |    |
| 06           |            |                        |                |    |





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

**INTEGRATED MANAGEMENT SYSTEM**

**Document Name:** Sustainable Procurement Policy Document

**Document No.:** WIPL-IMS-MNG-MN-02

**Rev. #**  
01

**Issue #**  
01

**Issue Date:**  
01.05.2025

**Page**  
3 of 8

**INDEX**

| <b>Sr. #</b> | <b>CONTENT/TITLE</b>  | <b>Page #</b> |
|--------------|---|---------------|
| 1            | Purpose   | 4             |
| 2            | Responsibility  | 4             |
| 3            | Introduction  | 4             |
| 4            | Stakeholder Engagement  | 4             |
| 5            | Product Responsibility  | 5             |
| 6            | Sustainable Supply Chain and Responsible Sourcing                             | 6             |
| 7            | Prohibition of Child Labour, and Prevention of forced labour at the workplace | 6             |
| 8            | Environment, Health and Safety  | 7             |
| 9            | Preferential Procurement  | 7             |
| 10           | Supplier Code of Conduct  | 8             |





## 1. PURPOSE

To establish a fundamental framework for transparent, fair, and efficient procurement practices. Guided by principles of compliance, competition, quality, and sustainability, we strive to maximize value while upholding ethical conduct and fostering strong supplier relationships.

## 2. RESPONSIBILITY

SCM, Purchase Manager, Purchase Executive, and Management

## 3. INTRODUCTION

This sustainable sourcing policy represents a pivotal subset of the company's broader policies, specifically tailored to govern and promote sustainable sourcing practices across its plants.

Witmans Industries Pvt. Ltd. is committed to sustainable, responsible, and inclusive procurement practices. We recognize that our procurement decisions can have a significant impact on the environment, society, and the economy. To guide our procurement practices and ensure that we meet our sustainability and social responsibility goals, we have developed a comprehensive set of policies.

Our Procurement Policy embodies our commitment to transparent, fair, and efficient procurement practices. Guided by principles of compliance, competition, quality, and sustainability, we strive to maximize value while upholding ethical conduct and fostering strong supplier relationships to support our dedicated efforts towards continuous improvement.

This policy provides the fundamental framework encompassing the guiding principles that govern Witmans' procurement practices. This policy covers the following aspects:

- Stakeholder Engagement
- Product Responsibility
- Sustainable Supply Chain and Responsible Sourcing
- Prohibition of Child Labour and Prevention of Forced Labour at the Workplace
- Environment, Health, and Safety
- Preferential Procurement

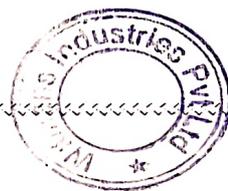
## 4. STAKEHOLDER ENGAGEMENT

WITMANS recognizes the paramount importance of engaging with all relevant stakeholders to foster transparency, collaboration, and trust in our procurement processes. Our commitment to stakeholder engagement aligns with our broader sustainability goals and corporate responsibility.

WITMANS is committed to the principles of stakeholder engagement in our procurement practices. We acknowledge that our stakeholders, including employees, suppliers, customers, and the local community, play a pivotal role in shaping our procurement decisions and the overall sustainability of our operations. To this end, we have established the following policy to guide our stakeholder engagement efforts:

### a) Active Stakeholder Engagement:

- WITMANS actively engages with stakeholders, including employees, suppliers, customers, and the local community, to understand their expectations, concerns, and insights regarding our procurement practices.
- We seek to build constructive relationships with our stakeholders and create an open and inclusive environment where their perspectives are valued.





**INTEGRATED MANAGEMENT SYSTEM**

**Document Name:** Sustainable Procurement Policy Document

**Document No.:** WIPL-IMS-MNG-MN-02

Rev. #  
**01**

Issue #  
**01**

Issue Date:  
**01.05.2025**

Page  
**5 of 8**

b) Incorporating Stakeholder Input:

- WITMANS is committed to ensuring that stakeholder feedback and input are integrated into our decision-making processes related to procurement.
- We recognize the invaluable insights that our stakeholders possess and strive to incorporate their recommendations, where feasible, to enhance the sustainability and social responsibility of our procurement activities.

c) Transparent Communication:

- We pledge to communicate transparently with our stakeholders about our sustainable procurement efforts and progress.
- While maintaining the highest standards of confidentiality and protecting competitive information, we will provide stakeholders with the information about our sustainability initiatives, achievements, and areas for improvement.

d) Continuous Improvement:

WITMANS is dedicated to continuous improvement in our stakeholder engagement practices as a means of enhancing our sustainability performance.

**5. PRODUCT RESPONSIBILITY**

WITMANS is dedicated to delivering safe, quality, and sustainable products to our customers while minimizing their environmental and social impacts. Our objective is to lead in product responsibility by integrating sustainability, ensuring compliance, and fostering collaboration.

a) Compliance with Regulations and Quality Standards:

- WITMANS complies rigorously with all product safety and quality regulations and standards, striving for excellence in product performance and safety.
- We remain vigilant in staying abreast of evolving regulatory requirements to ensure our products consistently meet or exceed the highest safety and quality standards.

b) Integration of Sustainability Criteria:

- Sustainability criteria are seamlessly integrated into our product evaluation, development, and sourcing processes to reduce environmental and social risks across the product lifecycle.
- These criteria encompass resource efficiency, responsible sourcing, energy and emissions reduction, and social impact assessments, guiding our decision-making and innovation efforts.

c) Collaborative Supplier Engagement:

- WITMANS recognizes the pivotal role of our suppliers in upholding our product responsibility standards, and we collaborate closely with them.
- Through active engagement, we promote responsible sourcing practices, ethical labour standards, and environmental stewardship throughout the supply chain.

d) Transparent Customer Communication:

- WITMANS provides customers with accurate and transparent information about the environmental and social attributes of our products.
- We empower consumers to make informed choices through product labels, packaging, and digital platforms, aligning our offerings with their values.

e) Continuous Improvement:

- WITMANS views product responsibility as an ongoing journey of improvement.
- We employ regular assessments, performance metrics, and feedback mechanisms to drive enhancements in our product responsibility efforts.





## 6. SUSTAINABLE SUPPLY CHAIN AND RESPONSIBLE SOURCING

WITMANS is committed to fostering a sustainable supply chain by promoting responsible sourcing practices among our suppliers. We aim to create a supply chain ecosystem that not only meets our operational needs but also aligns with our sustainability and ethical standards.

### a) Identifying and Assessing Risks:

- WITMANS recognizes the importance of identifying and assessing environmental, social, and ethical risks within our supply chain. We work collaboratively with our suppliers to understand and mitigate these risks.
- Through rigorous risk assessments, we proactively address issues such as environmental impact, labour conditions, and ethical concerns to ensure the integrity of our supply chain.

### b) Supplier Selection:

- WITMANS prioritizes the selection of suppliers who demonstrate a clear commitment to sustainability, responsible sourcing, and ethical business practices.
- Our supplier evaluation process considers criteria such as environmental certifications, social responsibility initiatives, and adherence to ethical standards, ensuring that our partners share our values.

### c) Supplier Collaboration:

- We engage in ongoing collaboration with our suppliers to improve their sustainability performance and promote responsible sourcing of materials and components.
- WITMANS supports suppliers in enhancing their environmental practices, ethical labour conditions, and social responsibility efforts, fostering a culture of continuous improvement.

### d) Monitoring and Reporting:

- WITMANS is dedicated to regularly monitoring and reporting on our supply chain's sustainability performance.
- We employ performance metrics, audits, and supplier assessments to track progress and ensure compliance with our sustainability standards. When necessary, corrective actions are taken to rectify non-compliance and drive positive change.

By identifying and mitigating risks, selecting responsible suppliers, collaborating for improvement, and maintaining rigorous monitoring and reporting processes, we aim to set a high standard for sustainability in our industry.

## 7. PROHIBITION OF CHILD LABOUR, AND PREVENTION OF FORCED LABOUR AT THE WORKPLACE

WITMANS is committed ensuring that our procurement practices do not contribute to child labour or forced labour. Our objective is to create a supply chain that upholds the highest ethical standards and promotes the welfare of workers.

### a) Strict Prohibition of Child Labour and Forced Labour:

- WITMANS strictly prohibits the use of child labour and forced labour in any part of our supply chain. We require all our suppliers to adhere to the same uncompromising standards.

### b) Due Diligence Processes:

- We will implement robust due diligence processes to identify and address potential risks related to child labour and forced labour within our supply chain.
- These processes include supplier assessments, audits, and ongoing monitoring to ensure compliance with our policy and international labour standards.

### c) Immediate Action and Supplier Accountability:

- WITMANS is committed to taking corrective action to rectify any violations of this policy. If necessary, we are prepared to terminate relationships with suppliers who do not comply with our stringent standards.





- We believe in upholding human rights and labour standards throughout our supply chain by both, ourselves and our suppliers.

Through this comprehensive Policy on Prohibition of Child Labour and Prevention of Forced Labour at the Workplace, WITMANS reaffirms its commitment to ethical and responsible business practices.

## 8. ENVIRONMENT, HEALTH AND SAFETY

WITMANS is committed to upholding stringent environmental protection standards and promoting the health and safety of our employees, suppliers, and the broader community. Our primary objective is to establish a sustainable, safe, and responsible workplace and supply chain.

### a) Legal Compliance and Continuous Improvement:

- WITMANS is unwavering in its commitment to strict adherence to all relevant environmental, health, and safety laws and regulations. We continuously seek opportunities for improvement in these critical areas.
- Regular assessments help us identify and implement measures to reduce our environmental impact and enhance health and safety protocols.

### b) Environmental Impact Mitigation:

- WITMANS takes a proactive stance in assessing and mitigating the environmental impact of our procurement activities. This includes responsible resource use, waste reduction, and emissions control.
- Sustainability initiatives, such as sustainable sourcing, energy efficiency, and waste reduction, are intrinsic to our operations, reducing our ecological footprint.

### c) Employee and Contractor Safety:

- The health and safety of our employees and contractors are paramount. We provide safe working conditions, comprehensive training, and necessary resources to prevent accidents and injuries.
- WITMANS fosters a culture of safety, encouraging employees to report concerns and actively participate in safety initiatives.

### d) Collaborative Supplier Engagement:

- WITMANS collaborates closely with our suppliers to promote environmentally friendly and safe practices within our supply chain.
- We expect our suppliers to share our commitment to sustainability and adhere to health and safety standards, working together towards a responsible supply network.

### e) Incident Reporting and Corrective Actions:

- WITMANS maintains clear protocols for reporting and investigating environmental, health, and safety incidents or violations.
- Immediate corrective actions are taken to prevent recurrence, and our policies and procedures are continually refined to maintain a proactive approach to safety and environmental stewardship.

## 9. PREFERENTIAL PROCUREMENT

Witmans' objective is to drive sustainability, inclusivity, and economic empowerment in our procurement practices. We aim to give preference to suppliers and products that meet stringent sustainability criteria.

**Sustainability Criteria:** We prioritize suppliers and products that align with our comprehensive sustainability criteria. These criteria encompass several key aspects:

- o **Environmental Responsibility:** We seek suppliers who actively reduce their environmental footprint through energy efficiency, waste reduction, sustainable sourcing, and emissions control. We aim to minimize our environmental impact through our procurement choices.





**INTEGRATED MANAGEMENT SYSTEM**

**Document Name:** Sustainable Procurement Policy Document

**Document No.:** WIPL-IMS-MNG-MN-02

**Rev. #**  
01

**Issue #**  
01

**Issue Date:**  
01.05.2025

**Page**  
8 of 8

- o **Ethical Practices:** WITMANS values suppliers who uphold ethical labour practices, respecting human rights, fair wages, and safe working conditions throughout their supply chain. We demand transparency and accountability from our partners.
- o **Local Economic Support:** Supporting local economies is paramount. We actively seek out suppliers who contribute to the economic growth and development of the regions in which they operate.

**Inclusivity Initiative:** In addition to our sustainability commitment, we are dedicated to promoting inclusivity within our procurement practices. This initiative is aimed at fostering economic empowerment, social equity, and diversity within our supply chain.

Through this Preferential Sustainable Procurement Policy, WITMANS strives to set a benchmark for responsible, inclusive, and sustainable procurement practices in our industry.

## 10. SUPPLIER CODE OF CONDUCT

- a) Witmans Group has been a values-driven organization since its inception. The five core values in the Witmans Code of Conduct (collectively "the Core Values") underpin the way we conduct our business activities:

### **INTEGRITY**

We will be fair, honest, transparent, and ethical in our conduct; everything we do must stand the test of public scrutiny.

### **UNITY**

We will invest in our people and partners, enable continuous learning, and build caring and collaborative relationships based on trust and mutual respect.

### **RESPONSIBILITY**

We will integrate environmental and social principles into our businesses, ensuring that what comes from the people goes back to the people many times over.

### **PIONEERING**

We will be bold and agile, courageously taking on challenges, and using deep customer insight to develop innovative solutions.

### **EXCELLENCE**

We will be passionate about achieving the highest standards of quality, always promoting meritocracy.

- b) Witmans Industries Private Limited, having adopted the Witmans Code of Conduct ("**COC**") is committed to the Core Values, and believes that the Suppliers are an integral part of its ecosystem and expects them to uphold the Core Values in their business transactions with the Company.
- c) The Supplier Code of Conduct ("Supplier Code") - separately developed - outlines the Company's expectations from the Supplier for upholding the Core Values and the key principles elucidated in this Supplier Code under four principles of governance and management practices; business ethics; labour practices and human rights; and environment, health, and safety.

WITMANS is committed to reviewing its Sustainable Procurement Policy 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

