



Supplier Sustainability Code of Conduct

Why do we need Sustainable Code of Conduct?

In alignment with ongoing EPL's sustainability journey, EPL has developed '**Supplier Sustainability Code of Conduct**' to ensure that all its suppliers, meet basic expectations of doing business ensuring compliance to legal requirements, ethical practices, human rights and environmental management. It is based on well-respected and recognized international standards, including the International Labour Organization, United Nations Universal Declaration of Human Rights and industry best practices.

Compliance with the code of conduct is an expectation of doing business with EPL, it defines minimum standards that it expects the suppliers and their sub-tier suppliers or sub-contractors ("the Supplier"), to respect and adhere to.

With Warm Regards

Rajesh Bhogavalli

Global Supply Chain Head, EPL

EPL Supplier Sustainability Code of Conduct

Purpose:

At EPL, we are committed to ensure that principles of sustainable development are firmly embedded in all our products, operations and value chain. This will allow us to deliver sustained value to our customers, our communities and the natural environment. We aim to adopt sustainable business practices in everything we do and seek to do business with value chain partners who demonstrate similar values.

This 'Supplier Sustainability Code of Conduct' outlines the key aspects of sustainable ways of doing business, which we request your commitment in writing and spirit. We actively seek to select and work with partners who share our commitment to integrate principles of sustainable development into all areas of their business. This document represents the beginning of an evolving and collaborative journey, and compliance to this 'Supplier Sustainability Code of Conduct' will lead to continuing relationship and positive business outcomes between EPL and its partners.

Applicability:

We appreciate that our partners operate in a variety of different legal, geographical, and cultural environments. We expect all Partners to comply with the code and hope that the partners will strive to exceed the below listed standards. EPL is committed to selecting and retaining qualified partners that meet this Supplier Sustainability Code of Conduct.

This Code of Conduct is in addition to, and not in lieu of, the provisions of any legal agreement or contract between the supplier and EPL. The following four categories encompass the Code of Conduct.

1. Ethics:

To meet social responsibilities, partners **are expected** to conduct their business in an ethical manner and to act with integrity. Ethical requirements include the following aspects:

Business Integrity

- Partners are expected not to practice or tolerate any form of corruption, kickbacks, extortion or embezzlement
- Partners will not offer or accept bribes or other unlawful incentives to/from their business partners
- Partners will not offer any EPL employee gifts or any other kind of personal benefit resulting from the relationships with the partners

Product Liability

- Partners must comply with EPL in terms of product safety, hygiene and specifications, company's requirements and national laws and regulations

Fair Competition

- Partners will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws

Privacy & Intellectual Property

- Partners will safeguard and make only appropriate use of confidential information and ensure that all

- employees' and business partners' privacy and valid intellectual property rights are protected

Reporting of unethical practices and grievance redressal mechanism

- Partners will provide means for their employees to report concerns or potentially unlawful activities in the workplace
- Any report should be treated in a confidential manner with due mechanisms for privacy protection and preventing any retributions. Partners will investigate such reports and take corrective action as required

Anti-Money Laundering, Terrorism Financing

- Partners will not participate/involve in money laundering, financing of terrorism/criminal activity
- Partners must comply with all applicable trade laws

Prohibition of Insider Trading

- Partners will not sell or take advantage of any material, non-public information of EPL

2. Labour:

Prevention of Child Labour

- We do not tolerate child labour in our supply chain. Partners should avoid any sort of child labour in their business operations consistent with the ILO's (International Labour Organization) core labour standards and the United Nations Global Compact principles

Freedom to Work

- We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in our supply chain. Bonded, indentured or involuntary prison labour is not accepted as well

Diversity and Inclusion

- Equal treatment of all employees will be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into

consideration – consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law

- Partners will ensure that their employees are not harassed or excluded in any way and provide equal opportunities to all
- EPL encourages partners to provide an inclusive and supportive working environment and to exercise diversity when it comes to their employees as well as in their decisions to select subcontractors

Fair Treatment

- Partners will provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment
- Furthermore, partners are expected not to unfairly terminate any employment contract or without

clear evidence specify that the termination of an employment contract, in relation to the working performance of an employee, is permitted by law

Working Hours, Wages and Benefits

- Working hours for partners' employees will not exceed the maximum set by the applicable national law
- Compensation paid to employees will comply with applicable national wage laws and ensure an adequate standard of living
- Partners' employees will be paid in a timely manner. It is recommended that partners offer their employees ample training and educational opportunities

Freedom of Association

- Partners will be committed to an open and constructive dialogue with their employees and workers' representatives
- In accordance with local laws, partners will respect the rights of their employees to associate freely, join labour unions, seek representation, join works councils and engage in collective bargaining
- Partners will not disadvantage employees who act as workers' representatives

3. Health, Safety, Environment, and Quality

Quality Requirements

- Partners will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet EPL's needs, perform as warranted and are safe for their intended use.

Health, Safety, Environmental and Quality Regulations

- Partners will comply with all applicable quality, health, safety and environmental regulations
- All required permits, licenses and registrations will be obtained, maintained and kept up to date
- Partners will fulfil their operational and reporting requirements

Product Safety

- Material safety data sheets containing all necessary safety-relevant information will be made available by partners for all hazardous substances and will be provided to EPL and other parties in case of a legitimate need Occupational Health and Safety Partners will protect their employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees
- Partners will provide appropriate controls, safe work procedures, preventative maintenance and

necessary technical protective measures to mitigate health and safety risks in the workplace

- When hazards cannot be adequately controlled by these means, partners will provide employees with appropriate personal protective equipment
- Safety information relating to hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards
- A safe and healthy working environment also includes as a minimum potable drinking water, adequate lighting, temperature, ventilation and sanitation and, if applicable, safe and healthy company living quarters

Process Safety

- Partners will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards.
- Partners will address product-related issues and their potential impact during all stages of the production process.
- For hazardous installations the supplier will conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosion.

Emergency Preparedness, Risk Information and Training

- Partners will make available safety information on identified workplace risks and partners' employees will be correspondingly trained to ensure they are adequately protected
- Partners will identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures

Waste and Emissions

- Partners will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and handled prior to release of any substance into the environment
- Partners will have systems in place to prevent or mitigate accidental spills and releases into the environment

Resource Conservation and Climate Protection

- Partners are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way

- Negative impacts on the environment and climate will be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material reutilization
- Partners will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions

Security

- Partners will have adequate and appropriate security practices across their supply chains.
- Partners will maintain processes and standards that are designed to assure the integrity of each shipment to EPL from its origin through to its destination and all points in between
- Partners are expected to implement the necessary and appropriate measures in their area of responsibility to ensure that EPL products, their workable components or raw materials as well as the corresponding know-how do not end up in the hands of counterfeiters or third parties and do not leave the legal supply chain

4. Management Systems

Partners are **expected** to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the **expectations** set forth in this Supplier Code of Conduct. This includes the following aspects:

Legal and Other Requirements

- Partners will comply with all applicable laws, regulations, contractual agreements and generally recognized standards

Communication of Sustainability Criteria in Supply Chain

- Partners will communicate the principles set forth in this Supplier Code of Conduct to their supply chain

Commitment and Accountability

- Partners are encouraged to fulfil the expectations set forth in this Supplier Code of Conduct by allocating appropriate resources

Risk Management

- Partners are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements

Documentation

- Partners are expected to develop adequate documentation to demonstrate that they share the principles and values expressed in this Supplier Code of Conduct. This documentation may be reviewed by EPL upon mutual agreement, including as part of any future supplier sustainability audits.

Training and Competency

- Partners will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards

Continuous Improvement

- Partners are expected to continuously improve their sustainability performance by implementing appropriate measures

Signed and Executed on the _____ (Day) of _____ (Month), 20____ (Year)