



**DMCC SPECIALITY CHEMICALS LIMITED**

(Formerly known as The Dharamsi Morarji Chemical Company Limited)

**SUPPLIER CODE OF CONDUCT**

## Document Controls

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1.0	10-Mar-2023	Procurement and MHD / Secretarial & Legal Function	Supplier Code of Conduct	Managing Director & CEO

## SUPPLIER CODE OF CONDUCT

### Philosophy

DMCC Speciality Chemicals Limited (Formerly known as “The Dharamsi Morarji Chemical Company Ltd”) is committed to adhering to the highest standards of integrity and carrying out its business in an ethical and sustainable manner and expects all its supply chain partners to comply with applicable laws and to adhere to the environment, social and corporate governance standards.

### Applicability

‘**Suppliers**’ means the supply chain partners who provide, sell, or seek to sell, any kinds of goods or services or who have any business relationship with DMCC or any of its subsidiaries and affiliated companies as defined under the Companies Act, 2013 (hereinafter collectively known as “DMCC”) and shall include:

- Vendors, Suppliers
- Service Providers
- Agents
- Consultants
- Contractors
- Joint-venture partners
- Third parties including their employees, agents and other representatives.

This Supplier’s Code of Conduct is applicable to all ‘**Suppliers**’ of the DMCC.

### Purpose

This Code sets forth the basic requirements to ensure Suppliers to respect and adhere to this Code when conducting business with DMCC. Each Supplier is required to act responsibly and with integrity and honesty, and to comply with this code and its underlying principles, policies and instructions. Suppliers should address any gaps in the implementation of this Code by establishing and implementing a time-bound improvement plan.

We expect and encourage our suppliers to develop and implement relevant management systems, appropriate for a company of their size and industry to ensure compliance with applicable laws and regulations and the requirements of the Code.

The underlying objective of this Code is to establish a basis for positive development of sustainable procurement practices through regular dialogues and ongoing working relationships.

## **THE CODE**

### **A. Business Integrity**

#### **1. Compliance with applicable laws/ regulations/ government orders**

All business and other activities of DMCC shall be carried out in compliance with all applicable laws/ regulations/ government orders and under the principles of good corporate citizenship in each country where DMCC is present. It is expected that each Supplier to comply with the requirements of all those laws and regulations that apply to the Supplier's workmen, staff, premises, business practices and to its relationship with DMCC.

#### **2. Bribery & corrupt business practices**

The Supplier, while dealing with DMCC, will not:

- i. directly or through any other person or firm, offer, promise or give to any of DMCC employees or to any third person any material or other benefit which he/she is not legally entitled to, in order to obtain in exchange any advantage of any kind whatsoever.
- ii. enter into any undisclosed agreement or understanding, whether formal or informal regarding prices, specifications, certifications, or any other matter that restricts a healthy competitive environment or introduces cartelization.
- iii. use improperly, for purposes of competition or personal gain, or pass on to others, any information or document provided by DMCC as part of the business relationship, regarding plans, technical proposals and business details, including information contained or transmitted electronically.

#### **3. Disclosure of Conflict of Interest**

Suppliers shall disclose to the Compliance Officer of DMCC any situation that could constitute a conflict of interest, such as DMCC employees having professional, private and/or significant financial advantages or interests in any of the supplier's businesses.

#### **4. Protection of intellectual property and proprietary information**

DMCC intellectual property is one of its most valuable assets and the patents, trademarks, copyrights, trade secrets, and other proprietary information of DMCC must be protected. Each Supplier is required to keep confidential all information and data that is disclosed to it by DMCC. The DMCC may require its supplier to sign a separate Non-Disclosure Agreement to secure the information disclosed by DMCC to the Supplier.

## **5. Prohibition on Insider Trading**

If the Supplier himself or any connected person to Supplier becomes aware of material information relating to **DMCC** or its business, which may not be available to the general public, then such person should neither buy or sell securities of **DMCC** nor engage in any other action to take advantage of that information, including passing that information on to others. In addition, while dealing with **DMCC**, if the Supplier himself or any connected person to Supplier becomes aware of material, information, which is not available to general public, of any other company, including **DMCC**'s customers, suppliers, vendors or other business partners, then such concerned person shall not buy or sell that company's securities or engage in any other action to take advantage of that information, including passing that information on to others.

It is hereby clarified that 'Connected Person' shall be construed as defined by SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

## **B. Human Rights & Local Community**

**DMCC** supports and respects the protection of Human & Labour rights as applicable:

### **1. Respect for Human and Labour rights**

**DMCC** does not accept any form of forced or compulsory labour, or the use of child labour. Every Supplier is required to abide by all Laws, rules, regulations & principles as applicable to its country of operation concerning Human & Labour rights including minimum wages and working hours. Suppliers should respect and adhere to internationally recognised labour and human rights standards as defined in the principles of the United Nations Global Compact. <https://unglobalcompact.org/what-is-gc/mission/principles>

### **2. Fair Treatment**

Suppliers must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

### **3. Local Community**

To promote responsibility for the communities they operate in, suppliers should listen to the concerns of local residents and provide for healthy and safe living conditions. The support of local job creation, local sourcing, education and infrastructure development is encouraged.

#### **4. Animal Protection**

DMCC have core values for the protection of the flora and fauna. Supplier should ensure not to use input material obtained from animal origin or extract and firmly commit to use alternatives. DMCC believe in maintaining the balance of natural eco-system. DMCC recognize that animals have the ability to feel and won't accept the suffering of any animal. DMCC condemn any cruelty towards the animal being and ensure that our animal policy is understood among all the levels in our organization, stakeholders and customers.

### **C. Health, Safety & Environment Sustainability**

**DMCC** endeavours to create hazard-free workplaces in all its locations for its employees, vendors, contractors, and others working in **DMCC** locations by applying high standards of occupational health and safety. **DMCC** strives to assure the safety of its products and solutions.

#### **1. Occupational Health & Safety**

Each Supplier is responsible for complying with the safety instructions, for using personal Protection equipment when required, and for reporting on any shortcomings regarding safety instructions or protection measures while they are in **DMCC** premises or **DMCC-controlled** sites. **DMCC** also encourages all its Suppliers to follow sound Occupational health and safety at their own premises.

#### **2. Resource Conservation and Climate Protection**

To ensure the conservation of renewable natural resources, suppliers shall promote the application of broadly recognized sustainability standards and certifications that have been developed by multiple stakeholders. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimized or eliminated at their source. Suppliers shall engage in the development and use of environmentally and climate-friendly products, processes and technologies.

#### **3. Waste and emission**

Suppliers shall ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled.

### **IMPLEMENTATION**

#### **1. Commitment & Accountability**

DMCC expects the Supplier to adhere to all applicable laws and regulations and in particular comply with this Code in letter and spirit. It is the Supplier's responsibility to

read and understand the contents of this Code. The Supplier is expected to comply with this Code and agree to uphold such values during its business association with DMCC. The Supplier should provide an Annual Affirmation as per Annexure I of this Code. The Supplier shall maintain adequate documentation to demonstrate compliance with the principles of this Code, and allow access to DMCC to check compliance upon request with reasonable notice. The Supplier shall notify DMCC regarding any known or suspected improper behaviour by the Supplier relating to its dealings with DMCC, or any known or suspected improper behaviour by DMCC employees.

In case of any queries/clarification, kindly email at [info@dmcc.com](mailto:info@dmcc.com)

**Confirmation on Supplier Code of Conduct**  
(to be taken Annually for the Financial year starting on 1<sup>st</sup> April to 31<sup>st</sup> March)

To  
**DMCC Speciality Chemicals Limited**  
(Formerly known as “The Dharamsi Morarji Chemical Co. Ltd.)

We .....(name) hereby confirm that we are in compliance with the Supplier Code of Conduct of DMCC Speciality Chemicals Limited.

**For .....(Name of the Supplier)**

**Authorised Signatory**

Date :

Place :