



THIRUMALAI CHEMICALS LIMITED

SUPPLIER CODE OF CONDUCT

Thirumalai Chemicals Limited (TCL) believes that it is in the mutual interest of both, the Company and suppliers, to meet the present and future requirements of business and society proactively. This includes demonstrating responsibility towards people involved in the manufacturing and delivery of products and services. The Supplier Code of Conduct sets out the principles for ethical and responsible business conduct. Compliance with this Code of Conduct is an integral part of the business strategy of the Company.

PURPOSE

The policy is created to unequivocally state our organisations desire to engage suppliers whose production processes are responsible and environmentally friendly.

SCOPE

It applies to all suppliers of goods and services to TCL, including suppliers, contractors, contract manufacturers and other relevant business partners with whom we share a contractual and commercial relationship. Suppliers are also expected to apply these principles to their subcontractors and third-party agents they work within providing goods and services to TCL.

SUPPLIER CODE OF CONDUCT PRINCIPLES

Ethics

Suppliers are required to adhere to high ethical standards and refrain from engaging in any corrupt, extortive or embezzlement activities. Furthermore, suppliers must not provide or accept any bribes or illegal incentives from their business associates and must maintain precise records of all their dealings with TCL and other partners

Employment and Labour practices

Suppliers are expected to have clear and effective guidelines, policies relating to following employment practices:

- a. Minimum age for employment – TCL has a strict ‘No Child Labour’ policy. Suppliers shall not employ anyone under the legal working age as defined by the local law
- b. Forced labour - Suppliers shall not use any form of forced or involuntary prison labour, bonded labour and slave labour.
- c. Abuse and harassment – Suppliers shall not use corporal punishment or other forms of physical or sexual harassment or abuse of their employees.
- d. Discrimination - Suppliers shall not discriminate based on any condition or characteristic, which is protected by applicable law or regulation.
- e. Freedom of association - Suppliers shall recognize and respect each employee’s right to associate with any legally sanctioned organization. The rights of labour unions and collective bargaining must be respected.

- f. Work hours, work-week and payment of wages - Suppliers shall comply with all applicable local laws and support equal pay for work of equal value. g. Health and safety - Suppliers shall provide their workers with safe, healthy and hygienic working conditions in order to prevent accidents, occupational illness and injuries arising out of, linked with, or occurring in the course of work or as a result of the suppliers' operations.

Environment

Suppliers shall comply with all applicable environmental, occupational health and safety regulations and international conventions on environmental standards. Suppliers will promote the safe and environmentally sound development, manufacturing, transport, use and disposal of your products. Will ensure by using appropriate management systems that product quality and safety meet the applicable requirements. Suppliers will protect your employees' and neighbours' life and health, as well as the general public at large against hazards inherent in your processes and products.

GOVERNANCE

Suppliers must develop, implement, use, and maintain management systems and controls related to the content of the Code. Suppliers must maintain documentation necessary to demonstrate conformance with the principles outlined in the Code.

MONITORING AND COMPLIANCE

TCL expects that suppliers adhere to all the applicable laws, rules, and regulations and strive to achieve both, the international and industry best practices. The provisions as set forth in the Code provide the minimum standards that have to be met in order to be an approved supplier and the qualifying standards that the Company expects a supplier to meet in the near future, but not necessarily before being approved as a supplier. The suppliers are also expected to provide free access to TCL and its affiliates to visit and inspect the state of affairs.

GRIEVANCE ADDRESS

Suppliers may write to Mr Srinivasa Raghavan, President TCL at raghavan.rs@thirumalaichemicals.com; for addressing their grievances, if they have any.

GENERAL

This policy is reviewed periodically to determine whether revisions may be required due to changes in the law or changes in our business or the business environment.