

CHEMVEDA

SUPPLIER CODE OF CONDUCT POLICY

Document Governance		
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Entities covered	Chemveda Life Sciences India Pvt. Ltd.	
Owner	Supply Chain Management Department	
Revision History	Earlier Version: 00 Date of Revision: NA Revision Effective Date: NA	Policy Approved By: CEO Dr. Bheema Rao Paraselli <i>P. Bheema Rao</i> 11-Sept-2025

1.0 PURPOSE:

This Supplier Code of Conduct is developed in accordance with our Sustainable Procurement Policy. We require our suppliers to rigorously adhere, uphold all the outlined principles across all operations and locations globally, ensure that all internal policies, procedures are revisited periodically to comply with this Code of Conduct.

2.0 SCOPE:

This Policy is applicable to all suppliers, contractors, service providers, business partners engaged with Chemveda that directly or indirectly provide services, raw materials, components, or other products.

3.0 RESPONSIBILITY:

S. No	Department	Responsibility
➤	SCM	- Communicate expectations: To share the Supplier Code of Conduct with all vendors during onboarding and ensure they understand the requirements. - Supplier Evaluation: Report any non-compliance if observed by any of the suppliers.
➤	HR	- Receive the noncompliance reports from any of the employees'/stakeholders/ any open channels flagged out. Summarize and report to the management. - Ensure employees interacting with suppliers are trained on the Supplier Code of Conduct.
➤	Suppliers/ Vendors	- Chemveda expects its suppliers to adhere to this code of conduct and maintain high standards of ethical practices, to operate with integrity across all aspects of business interactions. - Expect to co-operate and comply with company's sustainability requirements, continuous improvement initiatives from time to time.

4.0 DEFINITIONS:

Not Applicable

5.0 PROCEDURES/RULES/PROCESS:

➤ Ethical and Fair Business Practices:

- Suppliers must engage in maintaining high ethical standards and maintain fair business practices, ensuring truthful, accurate advertising to protect consumers, competitors, promote healthy competition. Additionally, suppliers must avoid agreements or actions that reduce competition, don't benefit customers. Activities typically violating antitrust or competition laws include fixing or controlling prices, coordinating bids to favor specific competitors or resellers (bid rigging), boycotting certain suppliers or customers, dividing or allocating markets or customers, or limiting the production or sale of products for anti-competitive purposes.
- Chemveda expects its suppliers to maintain high standards of ethical conduct and to operate with integrity across all aspects of business, interactions.
- Suppliers shall:
 - Foster a culture of honesty, integrity in their workforce, everyday activities, interactions with suppliers, customers, subcontractors, government agencies, and other relevant parties.
 - Resolve any conflicts of interest in a fair, lawful manner, adhering to equitable and just solutions as prescribed by law.
 - Adhere to principles that prevent any form of tax evasion, ensuring policies, procedures are in place to prevent employees and associated people from engaging in such activities.
 - Fulfill obligations in compliance with economic sanctions and refrain from participating in unsanctioned economic boycotts.
- Anti-Bribery and Corruption
 - As a company that operates globally, Chemveda is subject to all relevant anti-bribery and corruption laws including but not limited to Prevention of Corruption Act, 1988 (India), maintaining procedures to monitor, enforce compliance with regulations pertaining to it.
 - Suppliers must avoid engaging in any form of bribery, corruption, extortion, kickback payments or embezzlement. They are expected not to provide any gifts or personal

benefits that could create conflicts of interest in their relationships with Chemveda employees. Suppliers should not engage in any forms of fraud or money laundering practices.

- Suppliers should actively work against all forms of corruption, including loans, or rebates, ensuring compliance with all relevant laws, rules, regulations. Suppliers are required to adhere to Chemveda's Anti-Bribery and Anti-Corruption policy by submitting the necessary documentation during the onboarding process or upon formal request.
- Gifts
 - Suppliers may offer gifts, entertainment of a reasonable nature, provided they are Bonafide, align with local trade practices, and comply with applicable bribery/corruption laws as well as Chemveda's policies. Suppliers must be cautious not to violate this Code by offering or receiving extravagant or unreasonable gifts that might be perceived as bribes or influence the judgment of the recipient.
 - Chemveda recognizes that modest gifts, celebratory events, and entertainment that do not appear excessive or create an image of impropriety are permissible under this Code. To determine the acceptability of a gift or entertainment, the following guidelines should be followed:
 - The offer must be moderate and reasonable (cash, cash equivalents, bullion are prohibited).
 - It should be a Bonafide customary business expense incurred in the regular course of business.
 - The item should not be intended to influence the judgment or compromise the independence of the recipient.
 - Compliance with applicable Anti-Bribery and Corruption (ABAC) laws, Chemveda's Code is necessary.
 - Recipients must have adequate support and proper documentation in the Supplier's records.
 - Suppliers should note that the monetary value of such gifts must not exceed USD 30 (INR 2500/-) Suppliers should avoid direct dealings during negotiations or otherwise with any Chemveda employee whose spouse, other family member, or close relation is employed by or has a personal or financial interest in the Supplier or the Supplier's business.

- Conflict of Interest

Conflict of interest includes situations where employees or directors of Chemveda may have any form of interest in the Supplier's business, whether through personal relationships, investments, directorships, or any economic ties with the Supplier. In the event of any conflict of interest arising at the time of empanelment or prior/post/during engagement, Suppliers are required to promptly disclose such situations to Chemveda.

- Confidentiality

Suppliers are required to safeguard confidential, proprietary information acquired through their relationship with Chemveda, including details about Chemveda, its clients, employees, and other associated parties. Such information must not be exploited for personal or commercial benefit. Suppliers must comply with applicable data protection laws and standards, ensuring the confidentiality of all employee records, personal data, or third-party information provided by Chemveda. Disclosure is prohibited unless required by law or expressly authorized by Chemveda in writing, emphasizing commitment to maintaining data security and integrity.

- Fair Competition

Suppliers must refrain from unfair competition methods and deceptive practices. This includes making false or misleading representations about their own or Chemveda's services, disparaging Chemveda's competitors or their products without justification, making unsubstantiated product claims, or using Chemveda's or another company's trademarks in a manner that confuses customers regarding the true source of the products or services.

- Data Privacy

- Suppliers are expected to handle personal data received from Chemveda in compliance with applicable data protection laws and specific instructions issued by Chemveda.

"Personal Data" encompasses information that can identify an individual, such as:

- Name, title, address, postal code
- Telephone numbers, mobile number, email address
- Gender, age, occupation, signature
- Financial and medical information
- Any other relevant data

- Suppliers must adhere to the following:
 - Not take or remove personal data from Chemveda premises/systems without prior written consent from Chemveda.
 - Maintain confidentiality for all personal data acquired by employees, agents, affiliates, subsidiaries, or subcontractors.
 - Not engage any third party to process the personal data obtained from Chemveda on its behalf without prior written consent from Chemveda.
 - Use personal data only in connection with the provision of goods/services/products to Chemveda.
- Suppliers can refer to Chemveda's privacy policy here: [Chemveda Privacy Policy](#).
- Information Security
 - Chemveda expects its suppliers to comply with security requirements as communicated periodically and included within any agreement. Suppliers are responsible for:
 - Ensuring compliance with contractual security requirements.
 - Supporting annual security assessments.
 - Notifying Chemveda promptly of any incidents and major changes or vulnerabilities.
 - Suppliers are expected to:
 - Notify Chemveda immediately upon becoming aware of any security incident or breach involving Chemveda or its customer data. hr@chemvedals.com
 - Mitigate any security risks identified during due diligence assessments conducted by Chemveda on supplier's security practices.
- Intellectual Property

Suppliers must respect and protect all intellectual property (IP) rights associated with Chemveda, its partners. Suppliers are prohibited from using, disclosing, or reproducing Chemveda's or its partner's IP without explicit written consent. This includes patents, trademarks, copyrights, trade secrets, and proprietary information. Suppliers must ensure that any materials or services provided do not infringe on third-party IP rights & agree to indemnify Chemveda against any claims arising from such infringements. All discoveries, inventions, or developments arising from the collaboration with Chemveda shall be promptly disclosed and assigned as per contractual agreements.

- **Third Parties Engaged by Supplier**

When a supplier engages a third party to provide services or goods to Chemveda, the supplier must ensure that the third party adheres to this Code of Conduct, refrains from activities that violate its terms. Every supplier agreement with contractors or sub-contractors should include clauses covering all subjects under this Code of Conduct. The supplier is responsible for monitoring the compliance of such third parties, ensuring they operate in accordance with applicable laws and regulations.

- **Business Continuity**

Suppliers must ensure they have plans and procedures in place to resume business operations in the event of any physical disaster (e.g., fire, flood, wind, earthquake, explosion) or work stoppage (e.g., labor strike, economic/social breakdown). Upon occurrence of such events, suppliers should immediately inform Chemveda of the situation, their plans for business continuity. With mutual agreement on business continuity plan terms between both parties, the supplier is expected to resume services within the committed timelines following a disaster or work stoppage event.

- **Termination of Business with Chemveda**

- Chemveda reserves the right to terminate any business relationship with a supplier in the event of a breach of this Supplier Code of Conduct or any other agreement terms. Such termination will be communicated with a written notice, providing a two-month period to allow for an orderly transition or resolution of outstanding matters.
- If a supplier wishes to terminate the contract, they must provide Chemveda with a written notice of two-month period outlining the reasons for termination and ensuring all contractual obligations are met during the notice period.
- During this notice period, the supplier is expected to continue fulfilling all obligations under any existing contracts unless otherwise directed by Chemveda. Termination may be initiated due to, but not limited to, non-compliance with legal standards, ethical misconduct, lack of quality, or failure to meet agreed-upon performance metrics. Chemveda may also terminate the relationship without cause, honoring the same notice period, and ensuring all validated invoices are settled according to standard payment terms.

- **Internal Audit**

Suppliers must establish a management system, maintain documentation for at least five years after expiration of agreement from the termination of their relationship with Chemveda to monitor and demonstrate compliance with:

- Applicable laws and regulations
- This Code of Conduct
- Any agreements entered with Chemveda
- Suppliers should have Standard Operating Procedures (SOPs) for handling quality complaints, implementing remedial and preventive actions.
- Suppliers must allow Chemveda to conduct audits of their premises and records to verify compliance with this Code, laws, any agreements with Chemveda.
- Audit findings may be recorded and utilized for regulatory requirements.
- Corrective actions must be properly recorded and documented.
- Suppliers agree to participate in Chemveda's supplier's quality and development programs (if any) and comply with all specified quality requirements and procedures, as revised over time.

- **Enforcement**

This Supplier Code of Conduct underscores the importance of honest business conduct and strong business ethics. These standards can only be met with the supplier's cooperation.

- Suppliers are responsible for ensuring that the Code is communicated to their employees, subsidiaries, business partners, and subcontractors involved in providing services to Chemveda, in a language they understand, to ensure adherence.
- Suppliers must self-monitor and demonstrate their compliance with the Code. Compliance with the Code is required alongside any other obligations in any agreement a supplier may have with Chemveda.

- **Grievance Redressal and Raising of Concerns**

Suppliers should provide mechanisms for employees to report concerns or potential illegal activities in the workplace confidentially and allow employees to maintain anonymity. They must investigate these reports and take the necessary corrective actions.

- **Whistleblower Protection and Anonymous Complaints**

Suppliers must establish programs to protect workers' confidentiality in whistleblower cases and prohibit retaliation against workers who report in good faith or decline to comply with orders violating the Supplier Code of Conduct. Suppliers should also provide anonymous channels for reporting workplace grievances in compliance with local laws.

➤ **Labor and Human Rights:**

Suppliers must not engage in forced, bonded, indentured, child labor or any forms of modern slavery. They are expected to uphold the human rights, as identified by the International Labour Organization, of their employees, treating them with respect and dignity.

- **Child Labor**

Suppliers must facilitate the removal of children from the worst forms of child labor and support their rehabilitation, social integration. Minimum age requirements, as stipulated under prevailing local laws for recruitment, must be strictly adhered to by the supplier. The supplier shall maintain proof of age documentation for all employees, which may be subject to inspection by Chemveda.

- **Freedom of Association**

Suppliers are expected to recognize, respect the rights of workers to freely, voluntarily associate, organize, bargain collectively in accordance with applicable laws, regulations. Suppliers should ensure that worker representatives are not discriminated against and are provided with appropriate access to carry out their representative functions.

- **Anti-Discrimination**

Suppliers must not practice discrimination in hiring and employment based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status.

- **Harassment at the Workplace**

Suppliers must have policies and procedures in place to prevent harassment sexual, non-sexual in nature of any kind within their workplaces. They should adopt appropriate grievance redressal measures for handling incidents of sexual harassment, as required by

relevant local laws, including, but not limited to, the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

- **Fair Treatment**

Suppliers are expected to follow fair employment policies including termination of employment with a valid reason. Suppliers must ensure a harassment-free workplace and avoid subjecting workers to harsh or inhumane treatment, including sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse, or unreasonable facility access restrictions.

- **Employment Policy**

Suppliers are expected to promote policies ensuring full, productive, and freely chosen employment, allowing workers opportunities to use their skills irrespective of personal attributes or beliefs.

- **Wages, Working Hours, and Benefits**

Suppliers should comply with applicable wage laws, ensuring timely communication with workers about their compensation, including minimum wages, and overtime benefits. Additionally, they must comply with laws concerning payment of minimum wages, legally mandated benefits, ensuring equal pay for work of equal value for men and women.

➤ **Environmental Health and Safety (EHS):**

Suppliers must integrate Environment, Health, Safety (EHS) as key components of their business operations, commit to safeguarding employees, the local community, and the environment by:

- Promoting EHS awareness among all employees, contractual workforce, and interested parties.
- Providing information and training regarding any hazardous materials, including pharmaceutical compounds, intermediates, along with Material Safety Data Sheets (MSDS) for all chemical compounds supplied to Chemveda.
- Monitoring the workplace for safety hazards and protecting workers and visitors from chemical, biological, and physical risks.

- Establishing processes to identify, prevent, and mitigate risks such as chemical spills that threaten worker safety or the environment, including emergency plans and response procedures.
- Adhere to relevant EHS laws, regulations, and secure all necessary permits, licenses, or registrations.
- Operating facilities to minimize adverse environmental impacts from use of raw materials, chemicals, non-hazardous, hazardous waste and encourage the conservation of natural resources.
- Establish processes for reuse, recycling, and reducing reliance on hazardous materials.
- Implementing systems for safe and lawful handling, movement, storage, recycling/reuse, or management of waste, air emissions, wastewater discharges.
- Maintaining a policy for sustainable and responsible procurement from vendors.
- Continuously improving performance by establishing objectives and goals in these areas.
- Demonstrating commitment to Environmental, Social, and Governance (ESG) principles through Sustainability Reports (SR), Integrated Reports (IR), or various sustainability-related evaluations.

➤ **Grievance Mechanism:**

Employees and/or Suppliers are encouraged to raise any concerns, suspicious activities or violations of this Policy, through hr@chemvedals.com, or direct communication with their point of contact. All reported concerns will be investigated thoroughly and addressed appropriately, maintaining confidentiality, anonymity throughout the process.