



## SUSTAINABILITY POLICIES

<b>Title of the Policy</b>	:	<b>SUPPLIER CODE OF CONDUCT</b>
<b>Policy No.</b>	:	20ML/HO/PUR/POLICY/002
Version no.	:	02
Version date	:	01.10.2024
Revision no.	:	00
Revision date	:	01.10.2024

SOP - Responsibilities:																	
R= Responsible (Process Owner)  A= Accountable for Implementation	Process Owners																
	Lead Auditor – SAS	Management	Operation Head	Site Heads	Manager - SAS	Marketing Heads	SCM Heads	Production Heads	Corporate QAQC Heads	Site QAQC Heads	Engineering Heads	Corporate IT Heads	Corporate ER Head	Corporate HR Head	Site HR Heads	Warehouse Head	Mining Head
<b>Authorizations</b>	A	A	A	A	A	A	R	R	A	A	A	A	A	A	A	A	A

This Policy is applicable to 20 Microns Limited:			
HO	OF	PL	WH
Head Offices	Offices	Manufacturing Plants	Warehouses

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## 20 MICRONS LTD.

Head Office: 347, GIDC, Waghodia,  
Dist.: Vadodara, Gujarat, India

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20 Microns Group, a leading producer of ultrafine industrial minerals and specialty chemicals, is committed to driving sustainability through innovative products and solutions. We integrate economic success, social responsibility, and environmental protection into our business operations, enabling our customers to address the current and future needs of society.

Ensuring sustainable development principles across our supply chain is a top priority. We aim to collaborate with our suppliers to enhance sustainability performance throughout the supply chain.

We expect our suppliers to:

1. Comply with Applicable Laws: Fully adhere to all relevant legal requirements.
2. Adopt ESG Standards: Follow internationally recognized Environmental, Social, and Corporate Governance (ESG) standards.
3. Cascade Standards: Make their best efforts to implement these standards with their own suppliers and subcontractors.

As part of our commitment, we expect suppliers to actively support, embrace, and enact the following ESG principles, rooted in the tenets of sustainable procurement:

- Human Rights
- Governance
- Labour Practices
- Environmental Stewardship
- Fair Operations
- Consumer Issues

Together, we aim to build a responsible and sustainable supply chain, contributing to a better future for all.

### 1. Scope

This policy applies to all procurement activities undertaken by 20 Microns Limited:

- ⇒ Management, all employees, customers, suppliers, contractors, workers and other stakeholders working directly and indirectly in and for 20 Microns Limited.
- ⇒ Governing and Operating entities of 20 Microns Limited:
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Sr. No.	Site Name	Site Address	Site Type
1.	Waghodia	Plot no: 347, GIDC, Waghodia, Dist.; Vadodara, Gujarat, India Plot No: 9-10, GIDC, Waghodia - 391 760, Dist:	Head Office and Registered Office

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		Baroda, Gujarat, India	
2.	Mumbai	Hindustan Kohinoor Industrial Complex, Mumbai, Mumbai 400083	Office
3.	Vadodara	307-308, Arun Deep Complex, Race Course, Vadodara, Gujarat	Office
4.	Alwar	B-77 & B-78, M.I.A.; Matsya Industrial Area, Alwar - 301 030, Rajasthan, India.	Manufacturing Plants
5.	Bhuj	Survey No: 149/P-1, 149/P-3, 156, 157, 158/P-1, 158/P-2, Village: Mamuara, Tal: Bhuj, Dist: Kachchh - 370 020, Gujarat, India	Manufacturing Plants
6.	Tirunelveli	104/3, Tenkasi Road, Village & Post - Puthur, Via - Alangulam, Dist: Tirunelveli - 627851, Tamilnadu, India.	Manufacturing Plants
7.	Hosur	Plot No. 23/24, SIPCOT Industrial Area, Phase II, Near TVS School, Hosur - 635 109, Tamil Nadu, India	Manufacturing Plants
8.	Udaipur	F-232-233 & 234, Road No. 1E, MIA, Madri, Udaipur - 313 003, Rajasthan, India	Manufacturing Plants
9.	Haldwani	Nr. Gola Ganpati Motors, Goraparav, Bareilly Road, Haldwani - 263139, Nainital, Uttarakhand, India	Manufacturing Plants
10.	Nagor	Plot No-I I, Nagor GIDC Estate, Village- Nagor, Bhuj-Kutch - 37000I.	Manufacturing Plants
11.	Parbatsar	H-116-117, IGC RIICO Industrial Area, Parbarsar, Tehsil - Parbarsar, District - Didwana-Kuchaman, Nagour, Rajasthan	Manufacturing Plants
12.	Uran Raigad	Plot no: 172/2, Chinchavan Village, Panvel - 410206, Tal: Raigad, Mumbai, Maharashtra, India	Warehouses
13.	Thiruvallur	Plot no: 127/2A, Thiruvallur High Road, Alamathi Village, Chennai - 600052, Tamilnadu, India	Warehouses
14.	Alampur	Alampur NH - 6, New Kolorah Andul, Near Gurudwara School Compound, B S Tar Pvt. Ltd., Howrah - 711302, West Bengal, India	Warehouses
15.	Mundra	Plot No: 01/02, At: Dhrub Revenue, Survey No: 81/1, Village Dhrub, Near Adani Port, Mundra - 370421, Gujarat, India.	Warehouses
16.	Anantpur	43/1, Near Tractor nagar, Garladinne, Anantpur - 515731, Andhra Pradesh, India	Warehouses
17.	Koliwad Sanjan	Plant No; B1, CTS No: NA239/P1, Supertech Industrial Park, Koliwad, Village: Sanjan, Taluka: Umbergaon, District: Valsad, Gujarat - 396150, India.	Warehouses



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It covers all goods, services, and materials procured for the company's operations globally.

All suppliers and business partners engaged in providing products or services to 20 Microns Limited are expected to adhere to the principles outlined in this policy. This includes compliance with ethical, environmental, human rights, and labour standards, as well as relevant local and international laws and regulations.

The scope extends to:

- Direct and indirect suppliers, including manufacturers, distributors, and service providers.
- Contractors and subcontractors engaged in activities related to 20 Microns Limited.
- Joint ventures and partnerships where procurement activities are involved.
- Logistics, transportation, and packaging providers associated with supply chain activities.

This policy is an integral part of our commitment to responsible and sustainable procurement. Suppliers must align their business practices with our Sustainable Procurement Policy, Labor and Human Rights Standards, and Environmental, Health, and Safety (EHS) requirements to ensure ethical and sustainable sourcing across our value chain.

## 2. Preface:

This Supplier Code of Conduct outlines the principles and standards expected of all suppliers, service providers, subcontractors, consultants, agents, and other business partners of 20 Microns Limited. It serves as a guideline for ethical business practices, aligned with the Universal Declaration of Human Rights, UN Global Compact's Ten Principles, International Labour Organization (ILO) Conventions, and 20 Microns Limited's Ethics Policy.

Suppliers must comply with all applicable laws and regulations, ensuring ethical, sustainable, and responsible business operations. This Code should be communicated to all relevant personnel in the supplier's organization. Where circumstances are not covered, suppliers must act ethically and professionally, supporting 20 Microns Limited's vision for a sustainable and responsible future.

## 3. Authority & Responsibility:

### Board of Directors:

- Provide strategic oversight and ensure alignment of the Supplier Code of Conduct with the company's sustainability and ethical sourcing goals.
- Approve supplier code of conduct updates and review overall supplier compliance performance.

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**Procurement Team:**

- Implement the Supplier Code of Conduct in all procurement activities.
- Conduct supplier due diligence, risk assessments, and compliance monitoring.
- Engage with suppliers to ensure adherence and facilitate corrective actions where necessary.

**Suppliers and Subcontractors:**

- Comply with the principles outlined in the Supplier Code of Conduct and integrate them into their operations and supply chains.
- Ensure transparency in their business practices and report any violations or concerns.
- Work collaboratively with 20 Microns Limited to meet sustainability and ethical sourcing requirements.

**Employees and Workers:**

- Adhere to the Supplier Code of Conduct in all procurement-related activities.
- Report any non-compliance issues observed within the supply chain.
- Support the company's commitment to sustainable and responsible procurement.

**4. Human Rights:**

20 Microns Limited is dedicated to respecting and upholding human rights. Suppliers must align with these principles:

- **Policy of Non-Discrimination:** Suppliers are required to adhere to principles of equal opportunity in all hiring and employment practices. This includes ensuring non-discrimination based on skin color, race, gender, sexual orientation, age, ethnicity, national origin, family status, religion, veteran status, mental or physical disabilities, or any other characteristic protected by law.
- **Right to Freedom of Association and Collective Bargaining:** Suppliers must respect employees' rights to form and join trade unions and to engage in collective bargaining in a lawful, peaceful manner, in accordance with applicable laws and regulations.
- **Prohibition of Forced and Child Labour:** Suppliers must Strictly prohibit forced, bonded, or child labour as defined by local laws and ILO conventions.
- **Fair Wages and Working Hours:** Provide wages that meet basic needs and comply with applicable regulations regarding work hours and overtime compensation.
- **Workplace Respect:** Maintain a work environment free from harassment, abuse, or inhumane treatment.

20 Microns Limited expects all suppliers to implement these practices to foster a fair, inclusive, and rights-respecting working environment.

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## 5. Labour Standards:

20 Microns Limited expects its suppliers to adhere to the conventions of the **International Labour Organization (ILO)** and uphold ethical labour practices, including the following principles:

### a) **Child Labour**

Suppliers are strictly prohibited from employing children below the legal working age of the respective country. They must also comply with ILO standards to ensure the health, safety, and morality of minors in the workplace.

### b) **Forced Labour and Human Trafficking**

Suppliers must eliminate all forms of forced or compulsory labour and ensure that employment is freely chosen. The supplier is also strictly prohibited from engaging in or supporting human trafficking practices, directly or indirectly, within their operations or supply chains.

### c) **Working Hours**

Suppliers must ensure that working hours comply with applicable labour laws, including the proper compensation for overtime as per local regulations.

### d) **Salaries**

Employee wages must, at a minimum, cover basic living needs. Additionally, suppliers should provide opportunities for employees to enhance their skills and advance their abilities.

Suppliers are required to ensure that their supply chains also respect these principles, particularly regarding child labour, forced labour, and human trafficking. 20 Microns Limited is committed to fostering ethical and humane labour practices across all operations.

## 6. Occupational Health & Safety Responsibility:

Suppliers must provide a safe and healthy workplace for their employees and contractors:

- Implement robust health and safety management systems compliant with ISO 45001 or equivalent standards.
- Mitigate workplace hazards and ensure proper emergency management plans.
- Provide personal protective equipment and training for safe operations.
- Establish emergency response plant and test periodically.

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## 7. Environmental Responsibility

Suppliers must conduct operations in an environmentally responsible manner, aligning with 20 Microns Limited's sustainability goals:

- **Regulatory Compliance:** Comply with environmental laws and regulations.
- **Resource Efficiency:** Use resources responsibly and adopt energy-efficient, low-emission technologies.
- **Pollution Control:** Minimize emissions to air, water, and soil, and manage waste effectively.
- **Biodiversity Protection:** Actively minimize negative impacts on biodiversity and natural ecosystems.
- **Climate Action:** Support global initiatives to combat climate change and adopt measures to achieve carbon neutrality.

## 8. Business Ethics and Governance

20 Microns Limited expects suppliers to operate with integrity, transparency, and accountability:

- **Anti-Corruption:** Adhere to strict anti-bribery and anti-corruption policies. Avoid unethical practices, including extortion, fraud, or embezzlement.
- **Fair Competition:** Abide by all antitrust and competition laws, ensuring fair market practices.
- **Trade Compliance:** Follow all import/export regulations, sanctions, and trade laws.
- **Conflicts of Interest:** Disclose any conflicts between personal interests and professional responsibilities.
- **Data Protection:** Adhere to strict handle all data securely and in compliance with national and international laws on data privacy, ensuring transparency and responsible data usage.
- **Ethical AI Usage:** Ensure that artificial intelligence applications adhere to ethical principles, transparency, and accountability.

## 9. Quality and Innovation

Suppliers must deliver products and services that meet applicable quality and safety standards.

- Implement processes that ensure compliance with local laws, safety protocols, and customer specifications.
- Prohibit counterfeit goods or intellectual property violations.

## 10. Social Responsibility

Suppliers must actively support social responsibility efforts:

- Avoid products containing conflict minerals that finance armed groups.
- Conduct due diligence on mineral sourcing in compliance with the rules and regulations established by Indian mining authorities.



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- Treat employees fairly and uphold the Universal Declaration of Human Rights.

## 11. Supplier Diversity & Inclusion

20 Microns Limited is committed to fostering an inclusive and diverse supply chain by actively engaging women-owned, minority-owned, veteran-owned, disability-owned, LGBTQ+-owned, and small businesses. Our goal is to create mutually beneficial relationships that strengthen our business and the communities we operate in.

### Key Commitments:

- Diverse Supplier Engagement – We prioritize sourcing from certified diverse suppliers that meet our quality, cost, and sustainability standards. Suppliers must provide valid certifications (e.g., MSME, Women-Owned Business Certification, Minority Business Enterprise Certification).
- Inclusive Procurement Process – We ensure equal opportunity for diverse suppliers in our sourcing and procurement decisions while maintaining fair competition based on performance, innovation, and service quality.
- Supplier Development & Support – We provide training, mentorship, and networking opportunities to help diverse suppliers grow and compete effectively.

## 12. Gift & Donations

Suppliers must acknowledge that 20 Microns Limited employees are strictly prohibited from accepting or offering any gift, payment, or other advantage that could influence, or appear to influence, a business decision. This restriction also applies to individuals closely associated with an employee, such as family members or friends.

The following guidelines apply:

- Permissible Items: Small promotional items of nominal value, such as pens, calendars, mugs, or candies, may be accepted once a year.
- Prohibited Items: Gifts such as tickets, vacations, lodging, group meals, personal favors, or similar items are not acceptable under any circumstances.

If there is any uncertainty regarding whether a gift meets the definition of nominal value, prior approval must be obtained from the 20 Microns Limited – Head Purchase.

20 Microns Limited is committed to maintaining transparency and fairness in all business dealings, and suppliers are expected to adhere to these principles.

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### 13. Confidentiality

Suppliers are obligated to maintain the confidentiality of all information provided by 20 Microns Limited. This includes, but is not limited to:

- Business or financial information
- Production methods, technology, and equipment
- Tools, methodologies, and personnel information
- Customer data, price discounts, and product samples
- Estimates, drawings, photographs, and any other proprietary materials

Any information designated as confidential must not be disclosed to unauthorized parties. Such information should only be shared with individuals, entities, or partners who require access for legitimate business purposes. These parties must also commit to maintaining confidentiality and safeguarding the information.

20 Microns Limited expects its suppliers to handle all confidential and proprietary information with the highest level of security and discretion.

### 14. Disciplinary Measures for Policy Violations

20 Microns Limited expects all suppliers to comply with the Supplier Code of Conduct covering Human Rights, Labor Standards, Occupational Health & Safety, Environmental Responsibility, Business Ethics, Quality, Social Responsibility, Gifts & Donations, and Confidentiality.

In case of non-compliance, the following disciplinary measures may apply based on the severity of the violation:

1. Minor Violations (e.g., delayed compliance documentation, inadequate training)
  - Written Warning and Corrective Action Plan (CAP) with a defined timeline.
2. Major Violations (e.g., repeated labor law breaches, unsafe working conditions, environmental non-compliance)
  - Probationary Monitoring, Financial Penalties, or Temporary Suspension of Orders until compliance is restored.
3. Critical Violations (e.g., child labor, bribery, fraud, severe environmental damage)
  - Immediate Contract Termination, Legal Action, or Blacklisting from future business with 20 Microns Limited.

Suppliers must implement corrective measures, and compliance audits will be conducted to ensure adherence. Persistent violations may lead to permanent disqualification.

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### 15. ESG Training & Compliance

We are committed to fostering sustainability and ethical business practices across our supply chain. To ensure alignment with our Environmental, Social, and Governance (ESG) standards, we provide training and guidance to our suppliers on key ESG topics, including environmental impact, labor rights, and ethical business conduct.

Suppliers are expected to participate in these training programs as required and integrate ESG best practices into their operations. Continuous learning and collaboration will help drive a more responsible and sustainable supply chain.

### 16. Supplier ESG Incentive Program

At 20 Microns Limited, we encourage and reward suppliers who demonstrate outstanding ESG (Environmental, Social, and Governance) performance. Through our ESG Excellence Certification, we recognize top-performing suppliers, reinforcing their credibility and market reputation. Additionally, we offer priority consideration in procurement and collaborative growth opportunities, such as training and joint initiatives, to suppliers committed to sustainability and ethical business practices. By integrating ESG incentives, we drive continuous improvement, foster responsible sourcing, and strengthen our supply chain's long-term resilience.

### 17. Verification And Audits

20 Microns Limited reserves the right to conduct compliance audits, either directly or through accredited third parties. Non-compliance may result in corrective actions, suspension, or termination of the business relationship.

### 18. Key Performance Indicators:

The following Process Performance is to be monitored and measured.

Sr. No.	Key Performance Indicators	Unit of Measurement	Baseline	Target	Timeline	Monitoring Frequency
01	To Increase / Cover % of supplier signing code of conduct	% of suppliers signing code of conduct	FY: 2021-22	100%	March-26	12 Months
02	Increasing Nos. of suppliers signing Sustainability terms and conditions	% of suppliers signing the	FY: 2021-22	100%	March-26	12 Months

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		terms and conditions on sustainability				
03	Increasing Nos. of suppliers covered under Sustainability Assessment	% of supplier covered under sustainability assessment	FY: 2021-22	100%	March-26	12 Months
04	Increasing Nos. of suppliers covered under Sustainability Audits	% of suppliers covered under sustainability on-site audits by Nos	FY: 2021-22	40%	March-26	12 Months
05	Increasing Nos. of person covered in Sustainability Procurement Training	% of employees covered in sustainable procurement training	FY: 2021-22	100%	March-26	12 Months

## 19. Review and Update

The Supplier Code of Conduct Policy will be reviewed at least once every two years to ensure its continued relevance and effectiveness. The review will be conducted by the Lead Auditor – Safety, Audit and Sustainability, Head of Supply Chain Management (SCM), Head of Purchase, and Head of Sourcing.

In the event of significant changes in our operations or business activities, the policy may be updated outside the scheduled review cycle to ensure alignment with our evolving sustainability objectives and compliance requirements.

## 20. Compliance and Acknowledgment

- Our suppliers recognize the values and principles outlined in our Supplier Code of Conduct and commit to upholding these standards by incorporating them into their operations.
- The supplier is requested to find the attached Supplier Code of Conduct ('Code') – Sustainability and Ethics Declaration form and return a signed copy on behalf of the company they represent.

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c) The supplier is requested acknowledgement and signing this Supplier Code of Conduct Policy:

I/We, the undersigned, acknowledge that I have received, reviewed, and understood the Supplier Code of Conduct of 20 Microns Limited. I/We recognize that this manual serves as a guiding framework for the Company's commitment to sustainable procurement practices.

By signing this acknowledgment, I/We confirm and commit to:

- Adhering to the Company's sustainable procurement requirements, including environmental sustainability, social responsibility, and ethical governance.
- Reporting any actual or potential violations of Supplier Code of Conduct policy.
- Supporting the Company's Supplier Code of Conduct policy initiatives and best practices.

By signing below, I/ We affirm my commitment to upholding the Supplier Code of Conduct policy of 20 Microns Limited and contributing to the Company's vision of responsible, ethics and sustainable procurement practices.

**Company Name** : \_\_\_\_\_ **Place** : \_\_\_\_\_  
**Stakeholder/ Employee Name** : \_\_\_\_\_ **Signature** : \_\_\_\_\_  
**Designation** : \_\_\_\_\_ **Date** : \_\_\_\_\_



Gaurang Gandhi  
AVP – SCM



Jagdish Patel  
AVP – Purchase



Peshank Patel  
VP – Sourcing

Place: WAGHODIA, VADODARA  
Date: 01/10/2024