



# SUPPLIER CODE OF CONDUCT

## HPL ADDITIVES LIMITED

Document No.: HPL/PROC/POL/02	Issue Date: 01/04/2025
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### Introduction

HPL Additives Limited (HPL) is a prominent manufacturer in the Polymer Additives and Specialty Chemicals industry. Founded in 1964 as India's first producer of Chemical Blowing agents, HPL has steadily expanded its portfolio to include Antioxidants for plastics, Azo-initiators, Chain Extenders, Cross-linking Agents, Water Treatment Chemicals, Hydrazine Hydrate and other Hydrazine derivatives. With four world-class manufacturing plants (three in Faridabad/Palwal, Haryana and one in Derabassi, Punjab) that are DCS controlled and equipped with state-of-the-art instrumentation, HPL ensures reliable, **safe** operating conditions and environmental protection at all its facilities. Technology and innovation drive HPL's growth – all process technologies are developed in-house through a robust R&D program recognized by the Department of Scientific & Industrial Research, Government of India. HPL's commitment to quality is reflected in its ISO 9001 certification (held since 1997) and best-in-class manufacturing practices, which ensure controlled processes, continuous improvement through corrective/preventive actions, and product excellence.

HPL believes in sustainable and a socially responsible business and has installed an EMS, certified under ISO : 14001 in 2001. As a step forward in its commitment to provide a safe and healthy work environment to all, HPL has complied with and obtained OHSAS : 18001 certifications in 2006. ISO 50001 (EnMS) and SA 8000 certification is in progress.

Sustainability and Responsibility are core to HPL's values. HPL continuously strives to enhance its net positive impact on the environment and society through initiatives that reduce greenhouse gas emissions, improve resource efficiency, and build a sustainable supply chain. In alignment with global frameworks such as the United Nations Sustainable Development Goals (SDGs) and the 10 Principles of the UN Global Compact (UNGC), HPL integrates Environment, Social, and Governance (ESG) considerations into its operations. With a strong presence in both domestic and international markets (exports contributing ~50% of turnover across 49 countries), HPL believes that its success is a result of not only its people, technology, and products, but also the ethical and sustainable practices of its partners.



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### Objective

HPL Additives is committed to doing business with suppliers who share its values and its culture of fair, ethical, and sustainable business practices. This **Supplier Code of Conduct** (the “Code”) outlines the minimum requirements and expectations for all suppliers to conduct business in an ethical, responsible, and legal manner. By setting forth this Code, HPL seeks to ensure that its suppliers operate with high standards of integrity, safety, quality, and social responsibility in their operations around the world.

This Code is applicable to all HPL **Suppliers**, both domestic and international. “Suppliers” in this context includes suppliers of goods and services, vendors, contractors, consultants, agents, distributors, joint venture partners, and any other third parties (including their employees and representatives) that have a business relationship with HPL or provide, or seek to provide, any goods or services to HPL. HPL expects all such partners to adhere to this Code and to implement these standards not only within their own operations but also down their supply chain with their sub-suppliers.

### Compliance and Beyond

This Code provides essential principles and norms aligned with global standards and best industry practices. Compliance with the Code is the minimum requirement; HPL encourages its suppliers to **go beyond** these requirements and demonstrate leadership through exemplary practices. Suppliers are expected to not only meet all legal and Code obligations, but also proactively improve their performance in environmental protection, labor standards, and ethical business conduct. Furthermore, HPL expects its suppliers to cascade these principles throughout their own supply chains, engaging with sub-suppliers and subcontractors to identify and mitigate ESG-related risks at all levels. By doing so, suppliers help build a more sustainable and responsible value chain in partnership with HPL.

### Management, Monitoring and Evaluation

Suppliers (and their sub-suppliers) shall develop and maintain internal policies, procedures, and management systems to ensure compliance with this Code. These systems should cover operational processes, record-keeping, and internal controls that enable the supplier to **monitor** adherence to the Code’s principles and to track continuous improvement over time. Suppliers are encouraged to periodically review and update their internal standards



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and information management systems in line with evolving global best practices and any new or changing regulations.

It is further expected that suppliers communicate their relevant policies and Code expectations to their employees and downstream supply chain partners. HPL may request documentation, reports, or other information from suppliers to verify compliance with this Code. Suppliers must promptly provide all such requested information and evidence of compliance. Failure to cooperate or to produce the requisite information within the stipulated timeline will be considered a breach of this Code. Such non-compliance may subject the supplier and its business associates to remedial actions by HPL, up to and including termination of the business relationship (as described in the **Enforcement** section of this document).

### Key Principles of the Supplier Code of Conduct

The following key principles are the foundation of HPL's Supplier Code of Conduct. All HPL suppliers are expected to adhere to these requirements:

#### 1. Compliance Management

**1. Statutory Compliance:** Suppliers and their sub-suppliers **must comply with all applicable laws and regulations** in the jurisdictions where they operate or conduct business. This includes, but is not limited to, laws and regulations relating to environmental protection, occupational health and safety, labor and employment, product safety, chemical management, and export/import controls. Suppliers should maintain up-to-date records of all licenses, permits, certifications, and registrations required for their operations (for example, environmental permits, operating licenses, chemical regulatory registrations like REACH for products sold in the EU, etc.) and furnish copies to HPL upon request. Suppliers are expected to have internal processes to monitor and track changes in relevant laws/regulations (such as updates to chemical safety legislation, trade compliance rules, etc.) and to ensure timely adaptation to remain compliant.

**2. Statutory Notices:** Suppliers (and their sub-suppliers) shall promptly inform HPL if they receive any official notices, citations, fines, penalties, or other sanctions related to violations of laws or regulations. This transparency enables HPL to be aware of potential risks in its supply chain. Suppliers should also communicate the corrective measures they are taking in response to any such legal or regulatory violations.



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**3. Prohibition of Tax Evasion:** HPL maintains a zero-tolerance stance towards illegal tax evasion and expects the same from its suppliers. Suppliers (and their sub-suppliers) must not engage in or facilitate any deliberate and fraudulent evasion of taxes in any jurisdiction. They should not misrepresent financial transactions or assist any party in diverting funds to unlawfully avoid tax liabilities. All financial dealings must be transparently reported and in compliance with applicable tax laws. Furthermore, suppliers are responsible for ensuring that their agents, intermediaries, subcontractors, and employees do not participate in tax evasion. Suppliers should implement and maintain reasonable processes (e.g. robust accounting controls and audits) to prevent and detect any form of tax evasion or associated misconduct within their operations or supply chain.

**4. Quality Assurance and Product Safety:** Suppliers and their sub-suppliers must adhere to HPL's quality requirements and industry standards to ensure that all supplies and services meet the agreed specifications and are safe for their intended use. This includes compliance with any quality assurance plans provided by HPL, as well as applicable national or international standards for product quality and safety. Suppliers are expected to maintain full forward and backward **traceability** of the products they supply to HPL (i.e. the ability to trace all components or ingredients of a product from origin to final delivery). Procurement of any materials or components for HPL's products should be done with HPL's prior consent, unless otherwise specified in the contract, and preferably from HPL's approved list of vendors (if provided). Deviations from specified quality standards or sourcing requirements must be communicated to HPL immediately for review and approval.

*HPL places a strong emphasis on formal quality management systems.* It is **required** that suppliers maintain a Quality Management System (QMS) consistent with ISO 9001:2015 (or an equivalent standard) and adhere to documented internal procedures for quality control. Suppliers should continuously monitor product quality and implement corrective and preventive actions (CAPA) when issues are identified. If HPL raises any quality concern or non-conformance, the supplier must address it within agreed timelines, conducting a root cause analysis (RCA) and implementing effective CAPA to prevent recurrence. All products and services delivered to HPL must strictly comply with HPL's technical specifications and quality criteria – no deviations or compromises will be accepted on quality without HPL's explicit, written approval.

**5. End User Information, Sanctions and Embargoed Entities:** Suppliers shall conduct their business in compliance with all applicable trade controls, export/import laws, and





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sanctions regimes. **Dealings with embargoed or sanctioned entities are strictly prohibited.** Suppliers are responsible for screening their own customers, end-users, and business partners to ensure they are not on any government-issued list of prohibited or restricted parties (such as sanctions lists maintained by the United Nations, United States, European Union, or other relevant authorities). If a supplier is providing products that ultimately will be exported or re-exported, the supplier must ensure that all such transactions comply with applicable export control regulations (e.g. U.S. Export Administration Regulations, ITAR, etc.) and that the end use and end user are permissible under law. Should a supplier become aware that any business dealings related to HPL might involve an embargoed country, entity or individual, or a violation of trade sanctions, the supplier must immediately inform HPL and cease those activities. HPL expects its suppliers to stay updated on international sanctions and embargo lists and exercise due diligence in all global transactions.

## 2. Environment

**1. Environmental Protection:** Suppliers shall comply with all applicable environmental laws and regulations and demonstrate responsibility in managing the environmental impacts of their operations. This includes obtaining and renewing all required environmental permits and operating in accordance with their conditions. Suppliers should actively work to prevent pollution and reduce environmental footprint by adopting a **precautionary approach** to environmental challenges – identifying potential environmental risks in their operations and taking preventive measures even if some cause-and-effect relationships are not fully established scientifically. It is advised that suppliers develop and implement a comprehensive environmental management policy or system (e.g. aligned with ISO 14001) to institutionalize greater environmental responsibility. Suppliers are encouraged to foster an environmentally conscious culture within their organizations and value chains, raising awareness among employees and sub-suppliers. Wherever feasible, HPL encourages suppliers to consider the **life-cycle impact** of their products and services (from raw material sourcing to end-of-life disposal) and to adopt practices that minimize negative environmental impacts at each stage.

**2. Hazardous Materials Management:** Any chemical substances or materials that pose a hazard to human health or the environment must be **identified, labeled, and managed safely** by suppliers. This includes proper handling, storage, transportation, and disposal of hazardous materials in compliance with applicable laws (such as hazardous waste rules,



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chemical handling regulations, etc.). Suppliers should have procedures for the safe use and emergency handling of chemicals (e.g. spill response plans). They must ensure that employees who work with hazardous materials are trained in their safe use and provided with appropriate Material Safety Data Sheets (MSDS/SDS) and personal protective equipment. In addition, suppliers should look for opportunities to replace hazardous chemicals with less hazardous alternatives or implement engineering controls to reduce risk. All movement of hazardous materials (including recycling or reuse) should be tracked and documented. Disposal of any hazardous waste must only be done through authorized channels or certified waste management contractors, in accordance with local and national regulations.

**3. Waste and Effluent Management:** Suppliers shall monitor and control the generation of waste (solid, liquid, and gaseous) from their operations and ensure responsible treatment and disposal. All industrial effluents and wastewater must be treated to meet or exceed the discharge norms set by local environmental authorities **before** being released into the environment or sewage systems. Solid waste, especially hazardous or non-biodegradable waste, must be handled and disposed of only in permitted facilities or via authorized recyclers, following the regulations in force. Suppliers should maintain records of waste generation and disposal and seek ways to minimize waste at source. This could include process optimizations that reduce scrap, reuse of materials where safe, or recycling programs. For waste that cannot be eliminated, suppliers should consider energy recovery or other responsible disposal methods rather than uncontrolled landfilling. Proper waste segregation (separating recyclable, hazardous, organic, etc.) is expected to ensure effective treatment. Suppliers should also manage air emissions (such as dust, fumes, or volatile compounds) with appropriate control equipment to meet regulatory emission standards and to minimize impact on the environment and neighboring communities.

**4. Energy Efficiency and Climate Impact:** Suppliers shall monitor their energy consumption and implement measures to improve energy efficiency in their operations. This includes keeping track of electricity, fuel usage, and other energy sources, and striving to reduce energy intensity (energy use per unit of output) over time. Suppliers are encouraged to invest in energy-efficient technologies, optimize production schedules to avoid peak energy waste, and maintain equipment for optimal energy performance. Whenever feasible, HPL encourages suppliers to **diversify their energy mix** by increasing the use of renewable energy sources (such as solar, wind, or bioenergy) to reduce reliance on fossil fuels and lower greenhouse gas emissions. Implementing energy management systems (e.g. ISO 50001) or conducting regular energy audits can help identify further opportunities for



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conservation. Suppliers should support global efforts against climate change by setting their own targets for GHG emissions reduction, in line with scientific and industry guidelines.

**5. Water Management:** Suppliers shall use water responsibly and ensure that any water withdrawal is from legally authorized and sustainable sources. Water usage (for processes, cooling, sanitation, etc.) should be regularly monitored, and suppliers should take initiatives to improve water-use efficiency (for example, by optimizing processes to use less water or by fixing leaks in distribution systems). HPL strongly advises suppliers to adopt and promote water **recycling and reuse** wherever possible – for instance, treating and reusing process water or rainwater harvesting to recharge groundwater or for non-potable uses. In regions facing water scarcity, suppliers should take extra care to minimize consumption and avoid negatively impacting community water resources. Implementation of water conservation projects (such as rainwater harvesting structures, greywater reuse systems, or water-efficient fixtures) is desirable. Suppliers should also ensure that wastewater is treated properly (as noted in Waste Management above) so that water returned to the environment is safe and pollution-free.

**6. Resource Efficiency and Circular Economy:** Suppliers must strive to optimize the use of natural resources (raw materials, chemicals, water, energy, etc.) in their products and processes. HPL expects suppliers to actively pursue **resource efficiency** measures – for example, using input materials more efficiently to generate less waste, optimizing packaging to reduce material use, or improving yield in manufacturing. Where appropriate, suppliers should incorporate the principles of a **circular economy** in their operations and value chain. This means designing products or components that can be easily recycled or re-used, using recycled or renewable materials as inputs where feasible, and developing take-back or recycling programs to extend the life of products and materials. By reducing, reusing, and recycling resources, suppliers not only minimize environmental impact but can also achieve cost savings. HPL encourages suppliers to engage with their own supply chain and customers to find innovative ways to close the loop on materials and reduce the overall resource footprint of products.

**7. Responsible Production and Consumption:** In line with global sustainability goals, suppliers are advised to promote **responsible production and consumption** patterns. This involves phasing out the use of substances or materials that are hazardous to the environment (and human health) and seeking safer alternatives. For example, suppliers should avoid using or distributing materials that are banned or restricted under international



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conventions or local laws (such as certain persistent organic pollutants, ozone-depleting substances, etc.). They should also strive to use raw materials that have a lower environmental impact across their life cycle – e.g., materials that are sustainably sourced or have recycled content. Responsible consumption from the supplier's perspective can include efficient inventory management to avoid overproduction and waste, and offering products that are durable and repairable. HPL encourages suppliers to raise awareness among their customers on proper use and end-of-life disposal of products. Wherever feasible, suppliers should implement programs to collect and recycle products after use, thus ensuring materials are kept in circulation and do not end up as environmental waste.

**8. Greenhouse Gas (GHG) Emissions:** Suppliers shall regularly **monitor and track** their greenhouse gas emissions and other air emissions from their operations. This includes direct emissions from their facilities (Scope 1), indirect emissions from purchased energy (Scope 2), and, where relevant, significant emissions in their value chain (Scope 3). In addition to GHGs (such as CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, etc.), suppliers should also control other air pollutants like volatile organic compounds (VOCs), aerosols, particulates, fumes, and any ozone-depleting substances released from their processes. All emissions must be managed in compliance with the emission limits and regulations specified by applicable environmental authorities. Suppliers are strongly advised to implement measures to **reduce** harmful air emissions – for example, installing air pollution control devices (scrubbers, filters), switching to cleaner fuel sources, optimizing processes to improve combustion efficiency, or adopting new technologies that emit less GHGs. Suppliers should document their emissions and reduction initiatives, and are encouraged to set targets for GHG emissions reduction in line with international frameworks (e.g., Science Based Targets initiative) to combat climate change.

**9. Ecosystem and Biodiversity Protection:** Suppliers shall take necessary steps to minimize the impact of their operations on natural ecosystems and biodiversity. This includes careful management of land use to avoid encroachment on protected areas or critical habitats. If a supplier's operations involve land disturbance (such as setting up a new facility or sourcing raw materials like minerals or agricultural products), they should assess the potential impacts on local ecosystems and strive to avoid or mitigate harm. **Deforestation or habitat destruction** for the sake of business operations should be strictly avoided. Wherever relevant, suppliers are encouraged to support the preservation and restoration of biodiversity – for instance, by sourcing raw materials from sustainable, certified sources (like sustainable forestry or palm oil certifications), or by participating in





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reforestation, conservation, or habitat restoration projects. Suppliers should also manage any interactions with wildlife (e.g., preventing pollution of natural water bodies, managing noise and light pollution, etc.) to minimize disruption to local flora and fauna. In the event that an operation could affect an ecosystem, suppliers should engage with environmental experts and local communities to develop biodiversity management plans. Overall, HPL expects suppliers to contribute positively to ecosystem protection, ensuring that growth and development do not come at the cost of environmental degradation.

### 3. Labour and Human Rights

**1. Freedom of Association and Collective Bargaining:** Suppliers shall uphold their employees' rights to freely associate, organize, and bargain collectively, in accordance with local laws and international conventions. Workers should be able to form or join labor unions or worker committees of their choice **without fear of harassment, interference, or retaliation**. Where employees are represented by a legally recognized union, suppliers should engage in good faith with their representatives and any collective bargaining processes. In countries where freedom of association is restricted by law, suppliers should facilitate alternative means for workers to voice their grievances and engage in dialogue with management (such as worker councils or grievance committees). Proactively fostering a fair and open work environment that welcomes worker representation and negotiation on working conditions is strongly encouraged.

**2. Freedom of Speech and Expression:** Suppliers shall ensure an environment where all employees can exercise their right to freedom of speech and expression in the workplace, within the bounds of law and respectful conduct. Employees should feel free to raise concerns, ideas, or criticisms related to work conditions, safety, or business practices **without fear of punishment or abuse**. Any limitations on expression (for example, to protect confidential business information or to prevent inappropriate speech) should be clearly communicated and grounded in legitimate business or legal reasons. In general, suppliers should promote a culture of open communication, where feedback from employees is valued and where speaking up about unethical practices, safety hazards, or other concerns is encouraged and protected (also see *Grievance Redressal* below).

**3. Forced or Compulsory Labour:** All forms of forced, bonded, or compulsory labor are strictly **prohibited** in HPL's supply chain. Suppliers and their sub-suppliers must ensure that all work is voluntary, and that employees have the freedom to leave employment after reasonable notice. There shall be no practice of workers having to surrender government-



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issued identification, passports, or work permits as a condition of employment (except for temporary safekeeping with the worker's consent), and workers should not be required to pay recruitment fees or other fees to obtain their job. Suppliers should be vigilant against all forms of human trafficking and modern slavery in their operations and upstream supply chain. It is **expected** that suppliers have due diligence processes to identify and eliminate any risk of forced labor – for example, by auditing labor brokers, monitoring working conditions, and ensuring workers are not exploited through debt bondage, threats, or other coercive tactics. If any form of forced labor is found, suppliers must take immediate corrective action, support the affected workers, and prevent recurrence.

Suppliers are required to conduct due diligence on their sources of raw materials and components to verify that forced labor does not exist in their supply chain. This may include obtaining certificates of origin, tracing supply routes, and maintaining documentation to demonstrate compliance. HPL reserves the right to request such evidence or audit the supply chain if there is any suspicion of non-compliance. Any violation of this requirement will be treated very seriously and may lead to immediate termination of the business relationship.

**4. Child Labour:** Suppliers and their sub-suppliers shall prohibit any use of child labor in their operations. The term “child” refers to any person under the minimum legal working age as defined by applicable local laws, or under the age of 14 – whichever is higher. In no case shall any person below 14 years of age be employed. Additionally, suppliers must not employ **young workers (under 18)** in hazardous or dangerous roles – this includes any work that is likely to jeopardize the health, safety, or morals of a person under 18, such as handling dangerous chemicals, operating heavy machinery, or working night shifts. Suppliers should establish reliable age verification processes during recruitment (such as checking government-issued identification documents) to ensure compliance with minimum age laws. If child labor is found in any operation, suppliers must take appropriate remediation measures that prioritize the welfare of the child – for example, safely removing the child from work, providing support for their education, and preventing the situation from recurring. HPL may require proof of such remediation and effective systems to prevent future child labor incidents.

**5. Non-Discrimination and Equal Opportunity:** HPL expects its suppliers to provide a workplace free of discrimination and harassment, and to promote equal opportunity for all employees. There shall be no discrimination in hiring, compensation, access to training,



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promotion, termination, or retirement based on personal characteristics or beliefs, including (but not limited to) **race, color, ethnicity, caste, nationality, religion, age, gender, sexual orientation, gender identity, disability, marital status, health condition, pregnancy, political affiliation, or social origin**. Employment decisions should be based on merit, qualifications, and performance, not on personal bias or prejudice. Suppliers should also strive to create inclusive work environments that value diversity. This includes providing reasonable accommodations for employees with disabilities or religious practices, as required by law. Any form of workplace harassment – whether verbal, physical, sexual, or psychological – is unacceptable. Suppliers should have clear anti-discrimination and anti-harassment policies and channels for employees to report incidents without fear of retaliation. By embracing diversity and ensuring fairness, suppliers contribute to a more innovative, respectful, and productive workplace.

**6. Wages, Benefits, and Working Hours:** Suppliers must comply with all applicable wage and hour laws and regulations, including those pertaining to minimum wages, overtime pay, legally mandated benefits, and working hour limits. Workers shall be paid at least the legal minimum wage or a **living wage** where applicable, whichever is higher. All overtime work should be voluntary and compensated at the premium rate required by law. Suppliers should provide employees with fair and legally mandated benefits, which may include paid leave (annual leave, sick leave, maternity/paternity leave), contributions to social insurance or provident funds, and any other benefits required by local law or contract. Wage payments must be made on a regular schedule (at least once per month) and in legal tender; paying wages in the form of goods, vouchers, or any other alternative currency is not permitted if prohibited by law. Except as allowed by law, **deductions from wages as a disciplinary measure are prohibited**. If any deductions (for taxes, social security, etc.) or wage adjustments are made, they should be transparent and clearly communicated to workers via pay slips or written explanation.

Working hours, including overtime, shall not exceed the legal maximum limits. Employees should be granted rest days, including at least one day off in every seven-day period, and given reasonable meal and rest breaks during shifts in accordance with labor laws. Any overtime work must be consensual and not a condition of employment. Suppliers are encouraged to keep accurate records of employees' working hours and wages to demonstrate compliance with these requirements. The overall conditions of work (wages, hours, rest periods, and other terms) offered by suppliers should equal or exceed the standards required by local law or industry norms. By ensuring fair compensation and



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reasonable working hours, suppliers help maintain a motivated workforce and uphold workers' rights.

**7. Occupational Health and Safety (OHS) and Industrial Hygiene:** Suppliers shall provide a safe and healthy working environment for all their employees and any other persons on their premises. At a minimum, suppliers must comply with all applicable occupational health and safety laws and regulations. In addition, HPL expects suppliers to take proactive, **reasonable precautions** to prevent workplace accidents and injuries. Key aspects of managing OHS include:

- **Safe Infrastructure:** Ensure that buildings, structures, and equipment are designed, constructed, and maintained in a manner that prevents accidents and minimizes health risks. All facilities should be routinely inspected for structural safety and hazard identification (e.g., proper guarding on machines, safe electrical installations, fire extinguishers and alarms in place).
- **Emergency Preparedness:** Put in place appropriate emergency preparedness and response plans to handle potential crises such as fires, chemical spills, explosions, natural disasters, or other industrial accidents. This should include clearly marked emergency exits and escape routes, fire detection and suppression systems, first aid supplies, and regular drills/training for employees on emergency procedures. Suppliers should be prepared to respond effectively to protect workers, the environment, and neighboring communities in the event of an incident.
- **Workplace Safety:** Identify and assess all potential hazards in the workplace (chemical, physical, biological, and ergonomic hazards) and implement measures to eliminate or mitigate them. This includes providing proper machine safeguards, ventilation for hazardous fumes, safe handling and storage procedures for chemicals, and ergonomic workplace design to reduce strain injuries. All processes and equipment should be operated in accordance with safety guidelines, and any risks should be clearly communicated to employees (through signs, training, and written instructions in a language they understand).
- **Hazardous Substance Control:** Ensure that all chemical, physical, and biological substances and agents are managed responsibly. Hazardous substances (e.g., toxic chemicals, flammables, airborne dust, loud noise, radiation) must be used, stored, and disposed of according to legal requirements and best practices to minimize





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exposure to workers and the community. Appropriate engineering controls (such as closed systems, exhaust ventilation, noise dampening) and safe work procedures should be in place to reduce risks. Regular monitoring (e.g., air quality tests, noise level measurements) should be conducted in high-risk areas to ensure exposure levels remain within safe limits.

- **Personal Protective Equipment (PPE):** Provide adequate and well-maintained protective gear to all employees (and visitors, contractors, or any persons who may be exposed to workplace hazards). PPE may include items such as safety helmets, glasses/goggles, gloves, safety shoes, hearing protection, respirators, or protective clothing, depending on the nature of the hazard. Suppliers should train employees on the proper use of PPE and enforce its use wherever required. PPE should be provided at no cost to employees and meet relevant quality standards.
- **Incident Management and Reporting:** Establish procedures for reporting and investigating occupational injuries, illnesses, and “near-miss” incidents. All workplace incidents should be documented, and root causes analyzed to prevent recurrence. Where required by law, incidents must be reported to authorities; additionally, suppliers shall report significant safety incidents to HPL if they are related to work done for HPL. Suppliers must take prompt corrective actions to address any identified safety hazards or system weaknesses. They are also encouraged to track safety performance metrics (like injury frequency rates) and continually improve their occupational health and safety management systems (for example, by aligning with ISO 45001 / OHSAS 18001 standards for health and safety management).

**8. Protection of Vulnerable Groups:** Suppliers shall pay special attention to the rights and needs of vulnerable individuals or groups that may be affected by their operations. This includes (but is not limited to) indigenous communities, migrant workers, temporary or contract laborers, persons with disabilities, pregnant or nursing women, younger workers (above the minimum age but under 18), and older workers. Suppliers should ensure that these individuals are not placed in roles that would jeopardize their health, safety, or well-being. For example, pregnant women and new mothers should not be assigned to work that involves dangerous chemicals or excessive physical strain; migrant or temporary workers should receive the same protections and benefits (where applicable) as local full-time workers; workers with disabilities should be provided reasonable accommodations to



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perform their jobs effectively. Suppliers should also respect the land and resource rights of local communities and indigenous peoples – engaging with them and obtaining consent where required for operations that might affect them. By recognizing and supporting vulnerable groups, suppliers not only comply with human rights principles but also foster an inclusive and fair workplace.

**9. Engagement with Local Communities:** Suppliers should strive to be **good corporate citizens** in the communities where they operate. They shall take steps to minimize or eliminate any adverse social or environmental impacts of their operations on local communities. This includes controlling pollution or nuisances (like noise, odor, traffic) that could affect neighbors, and ensuring that waste from operations does not contaminate local soil or water resources. When planning new projects or changes that may significantly affect local communities, suppliers should conduct broad-based stakeholder consultations – meaningfully engaging with community members, local authorities, and other stakeholders to understand their concerns, needs, and expectations. If any grievances or complaints arise from the community related to the supplier’s operations, the supplier should address these concerns in a timely and transparent manner, seeking mutually agreeable solutions. HPL also encourages its suppliers to contribute to the **socio-economic development** of local communities. This could be done through initiatives such as local hiring and skill development programs, community education or health projects, infrastructure development, or other corporate social responsibility (CSR) activities. By supporting local communities and maintaining open communication, suppliers can build trust and foster positive relationships in the regions where they do business.

**10. Protection of Human Rights:** Suppliers shall support and respect internationally recognized human rights in their operations and ensure they are not complicit in human rights abuses. This means that, in addition to the specific labor rights mentioned above, suppliers should conduct their business in a manner consistent with the principles of the **Universal Declaration of Human Rights (UDHR)** and other international human rights frameworks. For example, suppliers should avoid any involvement in abuses such as inhumane treatment, genocide, war crimes, or any form of exploitation. If the supplier operates in areas of conflict or high risk, they should take extra precautions to ensure they are not directly or indirectly contributing to human rights violations (for instance, by financing armed groups or using security forces that violate rights). HPL encourages its suppliers to have a human rights policy or statement and to provide training to their management and employees on respecting human rights. If a supplier identifies any adverse



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human rights impact caused by or linked to its operations, it should act swiftly to remediate the issue and engage with stakeholders to prevent future occurrences.

**11. Humane Treatment and Workplace Harassment:** Suppliers shall treat all employees and workers with dignity and respect. Any form of harsh or inhumane treatment is strictly forbidden. This includes physical abuse, corporal punishment, violence, or the threat of any such abuse. It also includes psychological abuse or coercion, such as bullying, intimidation, or unreasonable disciplinary actions. Sexual harassment or abuse of any kind is absolutely prohibited. Suppliers should have clear disciplinary policies in place that do not involve any form of physical or mental coercion. All disciplinary measures should be documented and be proportionate to the infraction, respecting the due process and rights of the employee. Training and awareness programs should be conducted to ensure that management personnel understand the importance of humane treatment. By promoting a workplace free from harassment and abuse, suppliers create a more productive, safe, and ethical work environment.

**12. Grievance Redressal Mechanism:** HPL expects its suppliers to provide their employees (and potentially other stakeholders, such as community members affected by the operations) with a formal, safe, and confidential **grievance mechanism**. This mechanism should allow individuals to report concerns, complaints, or grievances to management without fear of retaliation. The grievances may relate to workplace issues (harassment, unfair treatment, safety concerns, etc.), violations of this Code, or any unethical behavior. The process for raising grievances should be clearly communicated to all employees (e.g., via training or postings) and should ideally allow for anonymity if desired (such as a suggestion box, hotline, or third-party service). Suppliers must ensure that all grievances are reviewed and addressed in a timely and fair manner by the appropriate level of management. There should be a process to investigate complaints, take corrective actions where needed, and inform the complainant (if not anonymous) of the outcome. All records of grievances and their resolution should be maintained. An effective grievance mechanism not only helps resolve issues before they escalate, but also provides valuable feedback for the supplier to improve its practices.

**13. Responsible Sourcing of Minerals (Conflict Minerals):** If applicable to the products supplied to HPL, suppliers shall take steps to ensure transparency and responsible sourcing of minerals in their supply chain. In particular, suppliers must ensure that any minerals (such as **tin, tantalum, tungsten, and gold**, or other minerals designated under conflict minerals



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regulations) used in the products supplied to HPL are not sourced from mines or areas that directly or indirectly finance armed conflict or involve serious human rights abuses. Suppliers should exercise due diligence on the source and chain of custody of such minerals and be able to provide supporting data or certifications upon request (for example, evidence of compliance with frameworks like the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals). HPL expects suppliers to have a policy or commitment in place to source minerals responsibly, and to require the same from their upstream suppliers. If HPL requests information regarding mineral origins (such as a Conflict Minerals Reporting Template), the supplier must provide prompt and accurate disclosures. In the event that a supplier discovers that minerals in their supply chain may be contributing to conflict or human rights abuses, they should immediately notify HPL and take corrective actions, such as switching to verified conflict-free sources. By ensuring conflict-free sourcing, suppliers contribute to ethical practices and legal compliance (e.g., compliance with U.S. Dodd-Frank Act Section 1502 and EU Conflict Minerals Regulation, where applicable).

#### 4. Corporate Governance and Business Ethics

**1. Anti-Corruption and Anti-Bribery:** Suppliers must conduct all business dealings with integrity and **the highest ethical standards**. Any form of corruption, extortion, embezzlement, or bribery is strictly prohibited. This includes offering, giving, receiving, or soliciting anything of value (money, gifts, favors, or other benefits) to influence a business decision or secure an improper advantage. Suppliers shall comply with all applicable anti-corruption laws and regulations, such as the Indian Prevention of Corruption Act, 1988, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, 2010, and any other relevant local or international anti-bribery laws. They should also comply with anti-money laundering laws like the Prevention of Money Laundering Act, 2002 (PMLA – India) and not use any payments received from HPL (or any business transactions) to facilitate money laundering or financing of terrorism. It is **advised** that suppliers implement an anti-corruption compliance program or policy, including regular training for employees on ethical conduct, procedures for reporting and dealing with suspected corruption, and due diligence when engaging third parties. If a supplier uses agents or intermediaries in their dealings related to HPL, the supplier must ensure those agents also comply with these anti-bribery expectations. Any incident or suspicion of corrupt practice involving HPL's business must be reported to HPL immediately. By enforcing strict anti-corruption measures, suppliers help maintain a fair and transparent business environment.





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**2. Conflict of Interest:** Suppliers must avoid situations where their interests conflict, or appear to conflict, with the interests of HPL. A conflict of interest may arise, for example, if a supplier's employee has a family or financial relationship with an HPL employee who can influence the business decisions, or if the supplier's company has some joint ownership or directorship that overlaps with HPL's personnel. Suppliers are required to **promptly disclose** to HPL any situation that may present a conflict of interest. This includes if any HPL employee or contractor has any kind of interest in the supplier's business (ownership, investment, or position of authority) or if any of the supplier's personnel have a familial relationship with HPL's staff. Once disclosed, HPL will review the situation and provide guidance on how to manage it, which may include reassigning business responsibilities or other mitigation measures. Suppliers are expected to conduct due diligence in their own organizations to identify potential conflicts of interest and take steps to prevent them. All business decisions should be made objectively and in the best interest of the business relationship, not due to personal considerations or relationships.

**3. Gifts, Hospitality, and Donations:** As a general rule, suppliers should not offer or give gifts, entertainment, favors, travel, or hospitality to HPL employees or representatives with the intent to improperly influence business decisions or gain undue advantage. HPL's employees are similarly restricted from accepting such benefits. **Nominal** gifts or customary business hospitality may be acceptable in some cultures, but they should be infrequent, of modest value, and should never be in exchange for favors or preferential treatment. Cash or cash-equivalent gifts are strictly prohibited. If a supplier feels that giving a token gift or providing hospitality is important for business etiquette (for example, providing a modest meal during a meeting), it should be reasonable and not violate any known HPL policies. Suppliers must promptly disclose to HPL management any gift or hospitality offered to an HPL employee if that HPL employee has requested it or if the value or nature might be perceived as inappropriate. Likewise, if any HPL personnel solicit gifts, favors, or personal hospitality from a supplier, the supplier should report this to HPL so that appropriate action can be taken. Transparency is key – when in doubt, disclose. Additionally, suppliers should not make any charitable donations or political contributions on behalf of or for the benefit of HPL without explicit written permission, as these could also be construed as bribery in certain contexts.

**4. Post-Employment Restrictions:** Suppliers shall not offer employment, consultancy, or any form of direct or indirect remuneration to any current HPL employee, official, or contractor who is involved in a procurement or business decision-making process with the



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supplier, **while such process is ongoing**. Furthermore, to prevent any improper influence or the appearance of such, suppliers should not hire or engage an HPL employee (or ex-employee) in a role that involves dealing with HPL for a period of at least one year after the individual has left HPL's employment, unless HPL is informed and provides consent. This "cooling-off" period helps ensure that individuals do not abuse their previous positions or confidential information in favor of the supplier. If a supplier is interested in hiring an ex-HPL employee within one year of their departure, it is best practice to discuss this with HPL's management or compliance team beforehand. The intent is not to limit legitimate hiring, but to avoid situations where an ex-employee might provide unfair competitive advantage or sensitive insights about HPL's operations to the supplier, which could undermine fair competition and trust.

**5. Fair Business Practices and Competition:** Suppliers shall conduct their business in line with fair competition and honest business practices. This means the **timely delivery of goods and services of reliable quality at fair prices**, as committed to HPL. Suppliers must ensure they have the rights and authorizations needed to use any HPL resources (such as access to HPL facilities, networks, information, or intellectual property) and those resources should only be used for their intended, **official purposes** as defined by the contract with HPL. Any assets, information, or intellectual property provided by HPL to the supplier (for example, product specifications, technical drawings, molds, software, etc.) remain the property of HPL and must be protected and used solely for authorized HPL-related work. They should not be duplicated, shared, or modified without HPL's consent. Misuse or misappropriation of HPL's assets or confidential information is strictly prohibited. Additionally, when representing or acting on behalf of HPL (for those suppliers who may interact with third parties or customers as part of their services), suppliers should not misrepresent themselves and should uphold HPL's reputation through professional conduct. In all business dealings, suppliers should avoid deceptive practices, false advertising, or making any dishonest claims about their products, services, or about HPL.

**6. Information Security and Privacy:** Protecting HPL's confidential information, trade secrets, and any personal data is of paramount importance. Suppliers who have access to any non-public information of HPL (such as product formulas, R&D data, manufacturing processes, pricing, customer lists, or any other sensitive business information) must safeguard it from unauthorized access, disclosure, or misuse. Such information should only be used for its intended purpose – performing the duties for which the supplier is contracted – and not for any personal or third-party gain. Suppliers should implement robust



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information security measures, including IT security controls (firewalls, encryption, secure passwords, anti-malware protection, etc.) and policies for handling sensitive data. If a supplier's work involves processing personal data on behalf of HPL (for example, handling HPL's employee or customer information, or any data that can identify an individual), the supplier must comply with all applicable privacy laws and regulations (such as GDPR in Europe, or relevant data protection laws in other jurisdictions). They should ensure appropriate consent and data protection measures are in place for any such personal data. In the event of any data breach or suspected compromise of HPL's information, the supplier must immediately notify HPL and take all necessary steps to mitigate the issue. Upon completion of their engagement, or upon HPL's request, suppliers should securely return or destroy any sensitive information pertaining to HPL. By maintaining high standards of information security and privacy, suppliers protect both HPL and themselves from risks of data loss, reputational harm, and legal liability.

**7. Anti-Competitive Behavior:** Suppliers shall comply with all applicable antitrust and competition laws. They must not engage in anti-competitive practices such as collusion with competitors (price fixing, bid rigging, market allocation), abuse of market dominance, or unfair trade practices. Each supplier is expected to determine prices, terms, and conditions for HPL independently and not in coordination with other suppliers. Sharing sensitive information with competitors (for example, discussing HPL's bids, pricing strategies, or market distribution) is inappropriate and could violate competition laws. Suppliers should equally avoid any agreement or understanding with others that restrains trade or manipulates the outcome of a competitive bidding process. Participation in industry associations or meetings is fine, but discussions must not stray into competitively sensitive topics. If a supplier feels that an HPL employee or any party is asking them to engage in or facilitate anti-competitive behavior, this should be reported immediately. By adhering to fair competition principles, suppliers help ensure that HPL's procurement processes and the broader market operate on a level playing field, fostering innovation and fair pricing.

**8. Transparency and Accountability (Disclosure of Information):** Suppliers should be transparent about their business practices and **responsive** to stakeholder inquiries. If a supplier identifies any violations or non-compliance with any law or with this Code within their organization or supply chain, they should promptly disclose it to HPL and take corrective actions. This might include, for example, discovering that a subcontractor is violating labor laws or that there was an inadvertent breach of environmental regulations. Proactive disclosure demonstrates a commitment to integrity and allows for collaborative



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problem-solving. Additionally, HPL encourages its suppliers to engage in non-financial reporting on sustainability performance (e.g., publishing a CSR or ESG report), in line with globally accepted standards such as the Global Reporting Initiative (GRI) or other frameworks, if they have the capacity to do so. Being forthcoming about challenges and progress in areas like environmental impact, labor practices, and governance can enhance trust with HPL and other stakeholders. Suppliers should also maintain accurate business and financial records in accordance with standard accounting practices and laws. No fraudulent or false entries should be made in records or reports. If HPL requests information for due diligence or compliance purposes (such as details on supply chain practices, audit reports, or financial statements to evaluate stability), suppliers should provide complete and truthful information. In summary, openness, honesty, and accountability are expected in all dealings.

### Enforcement of the Code

HPL reserves the right to verify suppliers' compliance with this Code of Conduct. To ensure adherence, HPL or its designated representatives may conduct **assessments**, which can include self-assessment questionnaires, on-site audits, inspections of facilities, and review of relevant records and documents. These assessments may be scheduled or unannounced, as deemed necessary by HPL. Suppliers are expected to cooperate fully, provide access to information, and be transparent during such evaluations.

If any instances of non-compliance or violation of this Code are identified, HPL will collaborate with the supplier to address and correct the issues within a reasonable timeframe. Depending on the nature and severity of the non-compliance, HPL may take various corrective actions at its sole discretion. These actions could include: providing guidance or training to the supplier's management (capacity building) to help them meet the Code requirements; working with the supplier on a corrective action plan with specific improvement milestones; a follow-up audit to ensure issues have been resolved; or, in serious or repeated cases of non-compliance, scaling back or terminating the business relationship with the supplier. HPL will generally allow a supplier adequate time and support to remediate problems; however, egregious violations such as use of child labor, forced labor, or willful and widespread environmental damage may result in immediate measures including potential contract termination.

Suppliers are encouraged to take a continual improvement approach toward sustainability and ethical practices, for example by using frameworks like Plan-Do-Check-Act (PDCA) to





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plan improvements, implement them, verify results, and act on lessons learned in an ongoing cycle. Demonstrating progress and a genuine commitment to meet the Code's expectations will be viewed favorably in the supplier's relationship with HPL.

Suppliers must understand that by entering into business with HPL, they are affirming their compliance with this Supplier Code of Conduct. The supplier is solely responsible for any consequences of non-compliance, and may be held liable for breaches. HPL shall be entitled to seek remedies as per the contract and this Code, and suppliers may be required to indemnify HPL for any losses or damages resulting from the supplier's violation of the Code or applicable laws.

Nothing in this Code reduces or replaces any legal obligations of the supplier; rather, it complements existing laws and sets a higher standard expected by HPL. If a provision of this Code conflicts with applicable law in any region, the law must be followed, and the supplier should inform HPL of the conflict. In all other aspects, the stricter requirement (between law and this Code) should be applied.

### Declaration of Compliance

All suppliers doing business with HPL Additives will be required to provide a one-time written declaration that they have received, read, and understood this Supplier Code of Conduct and agree to abide by its provisions. By signing the declaration, the supplier confirms that it has not engaged in any activities in the past that would violate the Code, and pledges that it will continue to conduct its operations in strict compliance with the Code (and related policies, such as HPL's conflict minerals policy) for the duration of its relationship with HPL. If the Code is updated by HPL, suppliers may be asked to reconfirm acceptance of the new requirements.

The following page provides **Annexure I**, which is the suggested format for the Declaration of Compliance to be submitted on the supplier's official letterhead. Suppliers must fill in the required details, sign it by an authorized representative, and submit it to HPL's procurement department as directed (typically during vendor onboarding or contract signing). This declaration will be kept on record as evidence of the supplier's commitment to uphold HPL's standards. Failure to provide the declaration, or providing a false declaration, may disqualify a supplier from doing business with HPL.



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### ANNEXURE I

*(To be printed on the official letterhead of the Supplier's company/firm)*

To,  
The Chief Procurement Officer  
HPL Additives Limited

**Sub:** Declaration of Compliance with HPL Additives' Supplier Code of Conduct **and**  
**Confirmation of Conflict Minerals Policy Compliance**

Dear Sir/Madam,

I/We, the undersigned, hereby declare that:

- **Acknowledgment of the Code:** I/We have read and clearly understood the HPL Additives Supplier Code of Conduct (the "Code") in its entirety, and we align with the values and principles outlined therein. We affirm that our organization believes in and upholds similar values of ethical, safe, and sustainable business operations as those enshrined in the Code.
- **Commitment to Compliance:** I/We agree to strictly adhere to all the requirements of the Code in all our business operations and transactions related to our relationship with HPL Additives. We have instituted appropriate policies and controls within our organization to ensure ongoing compliance with the Code's provisions. We further certify that to the best of our knowledge, we **have not engaged in any activity** in the past that would constitute a violation of the Code. Should any incident of non-compliance occur, we will promptly inform HPL and take corrective action.



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- **Disclosure of Exceptions:** None of our current activities or past conduct related to our business with HPL are in violation of the Code. **(In case of any exceptions or past violations, they are listed here with a short description; if there are no such exceptions, write "Nil.")**

*(Please provide details of any violation(s) of the Code, if applicable. If there are no known violations, please state "Nil.")*

I/We understand that this declaration will be kept on record by HPL Additives as part of the compliance requirements. I/We also understand that failure to comply with the Code may result in remedial action by HPL, including potential termination of the business relationship.

Authorized Signatory: \_\_\_\_\_

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Company Name: \_\_\_\_\_

Date: \_\_\_\_\_

*(Company Seal)*





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Authorized Signatory: \_\_\_\_\_

Name: Anil D. Mishra

Designation: AVP - EHSS

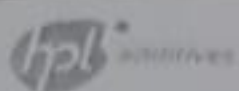
Company Name: Kanoria chemicals & Industries Ltd.

Date: 27/11/2025

(Company Seal)







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Authorized Signatory: \_\_\_\_\_

Name: Mandar Gaikwad.

Designation: Manager - Boron & Bulk Chemical Sales.

Company Name: Dmcc Speciality Chemicals Ltd.

Date: 28/11/25



(Company Seal)