

Supplier Code of Conduct

1. Introduction

SeedWorks International Pvt Ltd (SWIPL) is committed to conducting business in an ethical manner, and in a way that promotes business integrity, environmental and social responsibility. This includes compliance with the laws of land and adherence to well-established ESG principles and standards such as National Guidelines on Responsible Business Conduct (NGRBC), the UN's Universal Declaration of Human Rights and the conventions of the International Labour Organization (“ILO’s”) Declaration on Fundamental Principles and Rights at Work and ILO’s Basic Terms and Conditions of Employment.

Additionally, the code also conforms to the requirements of (i) IFC Performance Standards (PS), (ii) Relevant IFC/ World Bank EHS guidelines and standards (general and sector specific guidelines) (iii) the International Covenant on Civil and Political Rights and the International Covenants on Economic, Social and Cultural Rights; as applicable on SeedWorks operations within the guidance of applicable regulatory framework.

The United Nations Sustainable Development Goals (SDGs) invite action from the private sector to address some of the world’s most pressing development issues. This Supplier Code of Conduct is one way in which SWIPL aligns with the SDGs. By managing actual and potential human rights and environmental risks in our supply chain SWIPL, attempts to contribute towards SDG 8 on decent work and economic growth, and SDG 12 on responsible consumption and production.

In support of this commitment, the Company has developed Supplier Code of Conduct. This Code sets forth the basic minimum requirements that the Company expects its Suppliers to respect and adhere to while conducting business with SWIPL.

The Supplier Code applies specifically to SWIPL Suppliers worldwide and seeks to encourage comparable standards of behavior, hence driving commitment to ethical improvements throughout the company’s supply chain. The company encourages its suppliers to not just comply with the Code, but to use reasonable endeavors to exceed it and promote continual improvement.

2. Scope

The terms of this Code apply to all Suppliers of SWIPL that are supplying goods and/or services.

3. Definitions

In this Code:

- “Supplier” means suppliers/ service providers/ vendors/ traders consultants/ contractors/ third parties including their employees, agents and other representatives, who have a business relationship with SWIPL and provide goods and/or services.
- “Worker” means any individual whom the Supplier employs, hires, engages or otherwise uses to conduct its business, on a full time or contract basis

- “Child Labour” - Our definition of child labor is consistent with the ILO’s (International Labor Organization) core labor standards and the United Nations Global Compact principles.
- “ESG” is an acronym which denotes Environmental, Social and Governance aspects

Supplier Code of Conduct Obligations

I. Legal compliance

- Suppliers shall abide by all applicable laws and regulations that govern their business activities.

II. Human Rights

- Suppliers shall not engage in child labour in any forms
- Supplier shall not use forced labour including bonded labour, paid or unpaid.
- Suppliers shall support equal opportunities and prevent discrimination at the workplace.
- Suppliers shall respect and support free association of labour and employee rights to join a trade union where allowable by law.

III. Labour Practices

- Suppliers shall comply with all applicable laws and regulations in areas of wages and working hours, including minimum wage, overtime and maximum working hours.
- Supplier shall provide all workers with written and understandable information about their terms of recruitment and employment, wages and benefits before they enter employment.

IV. Environment

- Supplier is expected to operate in a manner that complies with all applicable environmental laws and regulations. Compliance will include, but not be limited to, air, water, solid waste, hazardous waste, electronic waste, energy efficiency and carbon footprint reduction.
- Supplier shall implement all necessary steps to reduce, reuse or recycle waste as much as possible.
- Suppliers shall show responsibility towards the communities in which they operate, manage community impact resulting from company operations and implement procedures for impact control.

V. Fair operating practices

- Supplier shall not be involved in any form of bribery and facilitation payments.
- Supplier shall take appropriate steps to safeguard and not infringe any of SeedWorks confidential and proprietary information/intellectual property/technology.
- Supplier shall conduct business in transparent, lawful and ethical manner.

VI. Quality and safety

- Supplier shall ensure all products and services delivered to SWIPL meets the quality and safety criteria specified and shall be safe for their intended use.
- Supplier shall ensure facilities have adequate HSE procedures and practices in place

VII. Business continuity and emergency preparedness

- Supplier shall make a reasonable effort to implement an emergency response program that addresses the most likely anticipated emergencies and the provisions made to mitigate risks to product supply.

VIII. Continuous improvement

- Supplier shall have or work towards a culture of continuous improvement

Ensuring Compliance, Questions and Reporting Concerns

- On request, Supplier will furnish SWIPL with relevant information and data to support compliance with this Code
- Subject to local laws and any legal restrictions applicable to such reporting, Supplier is expected to promptly report to SeedWorks any violation of this Code that it becomes aware of.
- Supplier or any of its Workers may report violations or ask questions about this Code through the. Confidentiality will fully be maintained, consistent with the need to conduct an adequate review.
- Supplier agrees not to retaliate or show any form of resistance against any of its Workers who, acting in good faith, report what they reasonably believe is a violation of this Code.

Implementation Guidance

Introduction:

This Implementation Guidance Document (the Guidance Document) supports and further clarifies the Supplier code of conduct obligations by providing a framework for improvement and examples of business practices and performance related to the code of conduct obligations. This set of guidance clarifies the Code of Conduct Obligations in each of the following areas: Legal compliance, Human Rights, Labour Practices, Environment, Fair operating practices, Quality and Safety, Business Continuity and Emergency Preparedness and Continuous Improvement.

The **Code of Conduct** articulate broad descriptions of *what* is expected

The **Guidance Document** illustrates some examples of *how* to meet those expectations.

While every effort has been made to ensure that the Guidance Document is helpful, the elements included here do not represent the only way to achieve the intent of the Obligations of the code of conduct. It is therefore up to each supplier to determine whether the practices or approaches to implementation are adequate.

This Guidance Document is consistent with the commitment to continual performance improvement along the supply chain. Neither the obligations, nor the Guidance Document, establish any new directives, business directions or corporate policies. Rather, taken together, they seek to articulate and promote good business practices and behavior. Moreover, it is not the intent of either the Obligations or Guidance Document to replace, or conflict with, any applicable legal or regulatory requirement. Legal obligations shall always take precedence.

In addition, suppliers can encourage their suppliers to promote the good practices throughout the supply chain.

Any doubts/ clarifications or questions regarding the Principles or the Guidance Document should be directed to ESG@seedworks.com.

1. Legal compliance

- Suppliers shall abide by all applicable laws and regulations that govern their business activities.

Sample Guidance Elements

- Suppliers shall maintain documentation necessary to demonstrate conformance with the expectations and compliance with applicable regulations.

- Documentation on key issues, for example: audit findings; injury & illness logs; worker benefits and pay information; inspections by regulatory agencies; worker complaints; performance assessments.
- Documentation methods are in the form of the most suitable medium, (i.e., paper, electronic), and are accessible on demand for review or updating

2. Human Rights

- Suppliers shall not engage in child labour in any forms
- Supplier shall not use forced labour including bonded labour, paid or unpaid.
- Suppliers shall support equal opportunities and prevent discrimination at the workplace.
- Suppliers shall respect and support free association of labour and employee rights to join a trade union where allowable by law.

Sample Guidance Elements

- Proof of age documentation for all Workers is in place
- The Supplier does not take fees or other obligations as a pre-condition of employment, with the consequence of indebting the Worker and binding him or her to employment.
- The Workers have the freedom to terminate employment at any time according to the agreed notice
- Period as stated in the employment contract
- Supplier shall not retain employee's original government-issued identification, passports or work permits as a condition of employment.
- The supplier shall ensure there is no discrimination with regards to workers based on race, religion, gender identity, marital or family status, age, political affiliation, nationality, physical ability, sexual orientation, ethnicity or any other dimension of their identity during recruitment and employment.
- Every worker shall be treated with respect and dignity. No worker shall be subject to any physical, sexual, psychological or verbal harassment or abuse.
- Supplier shall not engage in human trafficking or exploitation, or import goods tainted by slavery or human Trafficking.
- The supplier shall establish and maintain an internal reporting mechanism through which matters of potential human rights violation, concerns and issues can be brought to the attention of accountable individuals in a confidential manner without fear of retribution

3. Labor Practices

- Suppliers shall comply with all applicable laws and regulations in areas of wages and working hours, including minimum wages, overtime and maximum working hours.
- Supplier shall provide all workers with written and understandable information about their terms of recruitment and employment, wages and benefits before they enter employment.

Sample Guidance Elements

- The Worker is paid a wage equal to or exceeding the legal minimum wage.
- Minimum wage notifications and working hour limitations are either posted, communicated or freely made available to employees upon request
- Compensation systems ensure that employees are paid promptly and on a regular basis in a manner that is direct, convenient and which does not rely on such instruments as coupons, promissory notes or other forms of transfer
- Payrolls records relating to the documented payment of wages for each Worker are maintained for a period consistent with the organization's record retention program
- Attendance records are in place to accurately track hours worked by permanent and contractual employees and to identify potentially irregular and unusual work patterns, including excessive overtime
- The organization ensures that each employee receives an accurate payroll receipt with each payment and that each payment is accurately recorded in payroll records that are subject to audit and verification

4. Environment

- Supplier is expected to operate in a manner that complies with all applicable environmental laws and regulations. Compliance will include, but not be limited to, air, water, solid waste, hazardous waste, usage of hazardous substances (including but not limited to use of agrochemicals, pesticides and others), electronic waste, energy efficiency and carbon footprint reduction.
- Supplier shall implement all necessary steps to reduce, reuse or recycle waste as much as possible.
- Suppliers shall show responsibility towards the communities in which they operate, manage community impact resulting from company operations and implement procedures for impact

Sample Guidance Elements

- All necessary permits, licenses, forms, returns as required under the various environmental laws
- All compliance associated with the applicable environmental laws.
- The suppliers ensures that their operations are not adversely impacting environment (across all media).
- Applicable laws & regulations relating to handling, storage, transportation, recycling and disposing of hazardous and non-hazardous waste are complied with
- Contractors for transport, storage and final disposal of waste are licensed according to applicable legislation.

5. Fair Operating Practices

- Supplier shall not be involved in any form of bribery and facilitation payments.
- Supplier shall take appropriate steps to safeguard and not infringe any of SeedWorks confidential and proprietary information/intellectual property/technology.

Sample Guidance Elements

- Monitoring and enforcement procedures shall be implemented to ensure that the practices are fair, ethical and in conformance with the anti- bribery and corruption practices/ processes;
- A reliable mechanism or approach such as helpline number/point of contact is in place to anticipate, identify and resolve bribery conflicts that may arise.
- Suppliers shall conduct business in transparent, lawful and ethical manner. Training programs have been conducted to communicate the definition of bribery.
- Complaints Register and Training records are maintained in a manner that is retrievable for purposes of review or verification
- Supplier shall maintain the confidentiality and integrity of SeedWorks related information ex: Packing material, Hologram, Packing art work, Agreement copy, rates , quantity of packing material etc.

6. Quality and Safety

- Supplier shall ensure all products and services delivered to SWIPL meets the quality and safety criteria specified and shall be safe for their intended use and in line with the applicable regulatory requirements.
- Ensure facilities have adequate HSE procedures and practices in place

Sample Guidance Elements

- All facilities are regularly cleaned and maintained in good condition.
- Suppliers should adhere to all requisite country, state and local workplace health and safety regulations and demonstrate its compliance through on ground implementation and documentation
- Suppliers should have obtained all the necessary permits, licenses for health and safety.
- Supplier shall provide all its workers with a safe, healthy and hygienic working environment, with access to clean toilet and drinking water facilities, adequate sanitary hygienic facilities and eating and food preparation areas.
- Suppliers shall ensure adequate fire and emergency preparedness through documentation and adequate implementation at the Site
- All machinery and other equipment used in production and operations are safe to use and equipped with the necessary safety mechanisms in order to prevent injuries.
- The equipment is inspected internally, Records of maintenance are kept and/or stickers/tags placed on the equipment.
- Appropriate PPE and protective clothing, shoes is available, maintained, used and provided for Workers and visitors in any harmful or potentially risky work areas.

- First aid kit is adequately stocked and available to Workers during all shifts as required in the regulations
- The chemicals are stored inside the chemical storage room or designated place in well-organized manner
- The chemical's MSDS are readily retrievable for purposes of review or verification
- Applicable laws and regulations relating to health and safety issues, including classification, reporting and inspections by authorities are complied with.
- Inspection records are maintained in a manner that is retrievable for purposes of review or verification

7. Business Continuity and Emergency Preparedness

- Supplier shall make a reasonable effort to implement an emergency response program that addresses the most likely anticipated emergencies and the provisions made to mitigate risks to product supply

Sample Guidance Elements

- The organization establishes and maintains clean and orderly housekeeping practices
- Safe and adequate lighting and ventilation is provided
- All emergency exits and means of egress remain unobstructed at all times
- Emergency plans are in place with potential hazards and emergency scenarios (fire, natural disasters, chemical accidents, etc.)
- Evacuation route plans are mapped within the facility
- Emergency contact number is displayed at a commonly visible location at different parts of the site premises
- Suppliers will ensure that they have trained manpower to deal with emergency scenarios
- Health and safety-related information will be clearly posted in supplier facilities in appropriate local/regional languages
- Worker training and fire drills are provided on a frequent basis
- Plans are monitored under the authority and oversight of competent and trained professionals
- Appropriate fire detection and suppression equipment's are tested and maintained regularly, with no overdue on the maintenance dates
- Fire suppression equipment's are well mounted onto the wall
- Combustible items are not stored near live electrical meter room/panels, battery chargers.
- The electrical equipment's are properly grounded/earthed and are in safe working conditions.

8. Continuous Improvement

- Supplier shall have or work towards a culture of continuous improvement

Sample Guidance Elements

- The supplier shall develop practical plans to reduce violations against practices and conditions covered by this code. The plans include measurable goals, responsibilities, concrete actions and timeframes.
- The supplier shall periodically audit or verify compliance to the plans.
- Records shall be maintained in a manner that is retrievable for purposes of review or verification

The current code of conduct document is dynamic and subject to revisions by SWIPL management, as and when required

