

 <p><b>ECHJAY</b> INDUSTRIES</p>	<p><b>DEPARTMENT MANUAL</b> <b>MANUAL NO. : DM-PUR-10</b> <b>DOCUMENT LEVEL : 2</b> <b>DEPT. / SECTION: Purchase</b></p>	<p><b>CHAPTER : DM-PUR-10-08</b> <b>DOC-PUR-SCOC-01</b>    <b>REV : 01</b> <b>DATE: 1.10.2025</b> <b>Page 1 of 5</b></p>
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## **ECHJAY SUPPLIER CODE OF CONDUCT**

### **Background:**

Echjay Industries Pvt. Ltd. ("Echjay") is committed to conducting business with the highest standards of integrity, ethical practices, and responsible governance. Echjay's values are built on respect for human rights, compliance with applicable laws, protection of the environment, and responsible business relationships across its global supply chain.

### **Objective:**

Echjay values its reputation for conducting business in a legally compliant, ethical, and sustainable manner. Consistent with this commitment, Echjay expects all its Suppliers to share these values. This Supplier Code of Conduct (hereinafter referred to as the "Code") establishes the minimum standards expected of all Suppliers in areas of labour and human rights, health and safety, environmental responsibility, business integrity, and compliance.

This Code is applicable to all "Suppliers" - both domestic and international. Suppliers refers to suppliers, service providers, contractors, traders, agents, consultants, joint venture partners, third parties, and their employees, representatives, and subcontractors — who have a business relationship with Echjay.

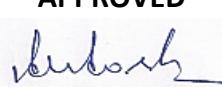
Moreover, Echjay expects all Suppliers to also conduct business with parties who uphold similar values.

### **1. Ethical Conduct**

- Suppliers shall conduct their business with professionalism, honesty, transparency, and integrity. They must reject corruption, bribery, unfair competition, and conflicts of interest.
- Legal Compliance: Suppliers shall comply with all applicable local, national, and international laws, regulations, and sector codes in all territories of operation.
- Fair Competition: Suppliers must refrain from anticompetitive practices and respect applicable competition laws.
- Transparency: Financial and commercial records must be accurate, complete, and reported in a transparent manner.
- Anti-Corruption: Suppliers shall not offer or accept bribes, kickbacks, gifts, or any improper advantage. They must not support money laundering or engage in fraudulent practices.
- Conflict of Interest: Suppliers must avoid situations where personal, family, or financial interests conflict with business responsibilities. Any such situation must be disclosed to Echjay immediately.

### **2. Labour & Human Rights**

- No Child Labour: Suppliers shall not employ anyone under the minimum legal age or under 18 years of age for hazardous work.
- No Forced Labour: All work must be freely chosen. Suppliers must not use forced, bonded, compulsory, or prison labour, nor withhold identity documents or wages.
- Ethical Recruitment: Workers must not be charged recruitment fees. Contracts must be provided in a language understood by workers.
- Equal Opportunity: Suppliers must provide equal employment opportunities, free from discrimination or harassment.
- Freedom of Association: Workers shall have the right to form or join trade unions and engage in collective bargaining without reprisal.

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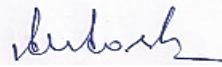
- Fair Working Conditions: Suppliers must comply with legal requirements on wages, benefits, overtime, working hours, and leave. Workers must receive at least the minimum legal wage.
- Modern Slavery: Suppliers must ensure their operations and supply chains are free from slavery and human trafficking.
- Equal – Opportunities Employer: The Supplier shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, color, ancestry, marital status, sex, age, nationality, and disability.
- Employees of the Supplier shall be treated with dignity and in accordance with maintaining a work environment free of sexual harassment, whether physical, verbal, or psychological.
- The Supplier shall not resort to unethical or corrupt recruitment practices nor retain any identification documents.
- Wage and Hours of Work: Suppliers shall follow all applicable laws regarding working hours, wages and overtime pay. Workers shall be paid at least the minimum legal wage.
- Conflict minerals: Suppliers must comply with the laws regarding the responsible sourcing of minerals and will apply and undertake any legally required investigations in relation to minerals sourced from conflict areas. Suppliers are also required to provide the ECHJAY INDUSTRIES PVT.LTD Group with any information regarding the potential impact on human rights or the environment of the minerals included in their products. If such an impact is suspected or confirmed, steps must be identified and taken as quickly as possible to find alternative sources of supply of the minerals in question.

### **3. Health & Safety**

- Suppliers shall provide a safe, healthy, and hygienic work environment, complying with all occupational health and safety laws.
- Effective health and safety policies must be implemented, covering emergency response, incident management, and training.
- Workers must be provided with safe working conditions, protective equipment, and access to occupational health facilities.
- Suppliers shall ensure that their products and services comply with applicable health and safety standards.

### **4. Environment Responsibility**

- Suppliers shall operate in an environmentally responsible manner and comply with all Applicable environmental laws.
- Environmental Protection: Suppliers must prevent pollution and protect natural resources and biodiversity.
- Sustainable Practices: Suppliers shall manage greenhouse gas emissions, energy consumption, water usage, waste, and resource efficiency responsibly.
- Circular Economy: Waste reduction, recycling, and reuse must be encouraged wherever possible.
- Hazardous Substances: Restricted or dangerous substances must be minimized or eliminated in manufacturing processes.
- Climate Commitment: Suppliers are encouraged to monitor emissions and adopt decarbonisation measures, renewable energy, and efficiency improvements.
- Noise: Suppliers must monitor and control industrial noise levels to avoid sound pollution and minimize impact on workers and communities.
- Renewable Energy: Encourage the use of renewable energy sources where possible, setting clear targets for energy transition.

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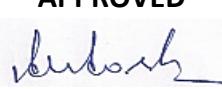
- Energy Reporting: Regularly report energy consumption, greenhouse gas emissions, and reduction initiatives to demonstrate transparency.
- Responsible Chemical Management: Suppliers shall identify, evaluate, and manage all chemicals used in production processes to ensure safety for workers, customers, and the environment.
- Chemical Handling Training: Provide regular training to employees on chemical handling, emergency response, and personal protective equipment (PPE) use.
- Material Safety Data Sheets (MSDS) : Require Material Safety Data Sheets (MSDS) for all substances and ensure transparency with downstream supply chain partners regarding chemical use.
- Environmental management: Suppliers must comply with environmental legislation and implement, operate and improve their procedures on an ongoing basis, giving particular consideration to the environmental aspects. In this regard, the ECHJAY INDUSTRIES PVT.LTD Group reserves the right to require that its suppliers obtain the
- ISO 14001 certificate or any equivalent certificates that the ECHJAY INDUSTRIES PVT.LTD Group deems necessary.
- Saving resources: Suppliers must consume natural resources responsibly, which includes the consumption of water and the use of raw materials.
- Reduction of greenhouse gas emissions: Suppliers must monitor the greenhouse gas emissions originating from their activities and make an effort to reduce those emissions, when possible design a decarbonisation plan to reduce those emissions throughout its value chain, consume renewable energy, and make efficient use of energy and fuels in general.
- Water, air and soil quality: Suppliers must prevent any contamination of the water, air and soil by means of continuous monitoring and reducing the use of pollutants. Should environmental damage occur, suppliers commit to allocate all the resources
- Necessary to restore the situation to what it was prior to the events that caused the impact in question?

## 5. Energy Efficiency in the Supply Chain

- Suppliers must actively adopt energy-efficient practices across their operations, including the use of energy-efficient equipment, LED lighting, optimized logistics, and smart manufacturing technologies.
- Develop and implement energy management systems (ISO 50001 or equivalent) to monitor and reduce energy use.
- Encourage the use of renewable energy sources where possible, setting clear targets for energy transition.
- Optimize transportation and logistics by reducing travel distances, improving load efficiency, and using low-emission vehicles.
- Collaborate with supply chain partners to share best practices and innovations that drive collective energy efficiency improvements.
- Regularly report energy consumption, greenhouse gas emissions, and reduction initiatives to demonstrate transparency.

## 6. Business Integrity

- Anti-Bribery: No offering or accepting of gifts, hospitality, entertainment, or improper advantages to influence decisions.
- Use of Influence: Business must not be advanced through personal, social, or political connections.
- Recruitment Practices: Suppliers shall not recruit Echjay employees without prior consent.
- Corporate Citizenship: The Suppliers' senior management personnel shall be committed to be a good corporate citizen, not only in compliance with all relevant laws and regulations, but also by actively

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assisting in the improvement of the quality of life of the people in the communities in which it operates, with the objective of making them self-reliant. Such social responsibility would comprise initiating and supporting initiatives in the field of community health and family welfare, vocational training, education and literacy, providing employment to physically challenged people and encouraging the application of modern scientific and managerial techniques and expertise.

## 7. Confidentiality, Data Protection & Intellectual Property

- Suppliers must safeguard Echjay's confidential information and intellectual property, and only use it for authorized purposes.
- Personal data must be collected, stored, and processed in compliance with privacy rights and applicable data protection laws.
- Suppliers shall not share Echjay's information with third parties without authorization or legal obligation.
- Counterfeit goods and piracy are strictly prohibited.

## 8. Third Party Representation

- Suppliers shall not represent Echjay or use its brands, logos, or intellectual property without express written consent. Authorized third parties must sign confidentiality or non-disclosure agreements and comply with Echjay's Code of Conduct.

## 9. Financial Practices

- Suppliers must conduct financial transactions transparently and accurately.
- Records must reflect the true nature of transactions and be open to audit or review by Echjay upon request.

## 10. Prohibition on Insider Trading

- If Suppliers become aware of non-public, material information about Echjay or its business partners, they must not trade securities or disclose such information.

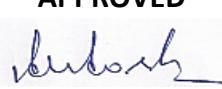
## 11. Reporting & Grievance Mechanisms

- Suppliers must establish grievance mechanisms allowing workers to report concerns confidentially, without retaliation.
- Suppliers must report unethical activities or discrimination to Echjay.

## 12. Supplier Responsibility & Compliance

- Suppliers must cascade the principles of this Code through their supply chains and ensure subcontractors and agents also comply.
- Adequate documentation must be maintained to demonstrate compliance.
- Echjay reserves the right to review and audit supplier practices. Non-compliance may result in termination of the business relationship.

## 13. Tax Laws Compliance

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- Suppliers shall comply with the tax laws and regulations of country in which it operates. Where tax laws do not give clear guidance, prudence and transparency shall be the guiding principle.

#### 14. Marketing and Sales

- Suppliers shall not make false statements or provide misleading information regarding its products or their performance, including the safety and environmental attributes of the products.

#### 15. Political Involvement

- Suppliers shall ensure that they do not give an impression of representing or being the spokesperson of M&M while getting associated with any political party or political activities in their personal capacity.

#### 16. Accountability & Review

- Oversight of this Code rests with Echjay's Commercial Management Committee.
- The Group Head – Commercial and Business Chief Commercial Officers are accountable for its implementation.
- The Code will be reviewed annually and updated where necessary.

#### 17. Declaration of Compliance

- Suppliers must provide a declaration confirming that they have read, understood, and agreed to comply with the Echjay Supplier Code of Conduct, and that they will extend these commitments throughout their supply chains.

#### Annexure I – Supplier Acknowledgment & Acceptance

We, the undersigned, hereby confirm that we have read, understood, and agree to comply with the **ECHJAY Industries Supplier Code of Conduct Policy**.

Supplier Name	
Authorized Representative	
Designation	
Signature	
Date	
Company Stamp/Seal	

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