



Supplier Code of Conduct Policy

To ensure clarity and consistency throughout this Supplier Code of Conduct Policy, the following glossary defines key terms used within the policy.

Glossary:

- **Suppliers:** Suppliers include all suppliers, vendors, contractors, sub-contractors, business partners, consultants, and any other entity entrusted with providing or which has provided goods and services to Pakka.
- **Business associates of Suppliers:** Business associates of Suppliers shall include contractors, subcontractors, employees agents and other entities directly providing goods and services to the Suppliers
- **Plan-Do-Check-Act (PDCA):** A continuous improvement framework used to enhance operational effectiveness and compliance.

Purpose:

At Pakka we consider suppliers as business partners who are essential to our value chain and contribute to our growth. We wish to collaborate with our suppliers to nurture strategic partnerships. This Code of Conduct is to establish collaboration and conduct business in a legal and ethical manner and business practices that integrates respect of human rights and environment, and in compliance with all applicable laws and regulations.

Scope:

This code is applicable to all suppliers of Pakka. Furthermore, Pakka can determine applicability of this code to the business associates of the Suppliers at a time and in a manner deemed appropriate.

The Supplier shall communicate the code to related entities and subcontractors who support them in delivering materials or services and ensure adherence from all related entities and subcontractors.

Guidelines on code:

1. Compliance management

- a. **Statutory compliance:** Suppliers shall comply with all applicable statutory laws, rules, and regulations. Records of all licenses, permits, approvals, necessary for conducting business, and furnish copies of same whenever requested, shall be maintained by the supplier.

- b. Statutory notices: Suppliers shall inform Pakka of any notice, penalties or other sanctions issued or imposed for violation of existing laws and regulations.
- c. Quality assurance: Suppliers shall comply with the quality assurance plan of Pakka and shall ensure that the quality of supplies provided are of good quality as per industry standards.

2. Environment:

- a. Environment protection: Supplier shall ensure compliance with existing legislations and regulations regarding the protection of the environment and promotion of good environmental practices. Suppliers should adopt the precautionary approach principle on environmental hazards. It is advised that suppliers develop and adopt an environmental protection policy and adopt life cycle-based approach and associated practices.
- b. Management of hazardous waste: Suppliers shall ensure that chemicals and other hazardous materials are identified and managed responsibly through their safe handling, movement, storage, recycling, reuse, or/and disposal.
- c. Waste and effluent management: Suppliers shall ensure that the wastewater and solid waste generated from their operations, and sanitation facilities are monitored, controlled, treated, and disposed of responsibly in accordance with the norms prescribed by the appropriate authorities or bodies.
- d. Water use: Supplier should only extract water from the legally authorized sources. It is advised that Suppliers adopt and promote recycling and reuse of water and improve water efficiency, while initiating water conservation strategies such as rainwater harvesting be adopted wherever feasible.
- e. Resource efficiency: Suppliers shall ensure and promote resource efficiency by the ways of designing products and processes in a resource efficient manner.

3. Human rights:

- a. Protection of human rights: Suppliers shall support and respect the protection of internationally recognized human rights.
- b. Promotion of humane treatment: Suppliers shall ensure dignified and respectful treatment of all within the workplace. Suppliers are advised to develop and adopt systems and processes to prohibit the use of threats of violence, verbal or psychological harassment or abuse, physical abuse, and/or sexual exploitation and abuse by any of their employees, contractors, parent company, and/or other business associates.
- c. Local communities and indigenous culture: Suppliers shall take necessary steps to minimize or eliminate adverse impacts of its

operations on the local communities.

Suppliers shall ensure that their operations are conducted in a manner that indigenous people, minorities (cultural, linguistic and religious), and local communities are not adversely affected. Suppliers should take proactive steps to preserve local culture and community.

4. Labour:

- a. Freedom of Association and Collective Bargaining: Suppliers shall recognize and respect employee rights to associate freely and to collective bargaining.
- b. Freedom of Speech and Expression: Suppliers shall ensure an environment in which all employees enjoy the fundamental right to freedom of speech and expression subject to the limitations of public order and morality.
- c. Forced and Compulsory Labour: All forms of forced and compulsory labour shall be strictly prohibited. Suppliers shall ensure that their workforce is free from victims of human trafficking.
- d. Child Labour: Suppliers shall prohibit employment of:
 - i. Children below 14 years of age or a higher age in case it is determined as the minimum age of employment or that of compulsory schooling by prevailing national regulations.
 - ii. Adolescents under the age of 18 for hazardous and/or dangerous nature of work
Suppliers are advised to establish systems and processes to reliably verify identity and age of their employees through verification of nationally accepted documents/ reports.
- e. Discrimination: Suppliers shall eliminate all forms of discrimination at workplace on the grounds of race, colour, age, gender, sexual orientation, religion, ethnicity, political opinion, nationality, social origin, disability, family status, or any such grounds as may be recognized under the applicable national laws as discriminatory.
- f. Wages, Working Hours and Other Conditions of Work: Suppliers shall ensure adherence to the prevailing regulations concerning working hours, overtime allowances, leaves and other entitlements of their employees. Suppliers shall ensure that their employees are paid directly in legal tender at the regular intervals (not exceeding one calendar month). Such payments shall be fair and in compliance with the minimum wages determined by the prevailing regulations. It shall be ensured that no unauthorized deductions are affected into the wages paid. Any deduction to this regard shall be informed, in prior to the workers in writing. The wages, hours of work and other conditions of work provided by Suppliers should be consistent with the best conditions prevailing locally.

- g. Occupational Health and Safety and Industrial Hygiene: Suppliers shall take reasonable steps to ensure that:
- i. The workplaces, machinery, equipment, and processes under their control are safe and without risk to human health.
 - ii. Adequate protective gears are provided to their employees or any other person exposed to hazards arising out of operations, conducted by the Suppliers, posing risks to the health.
 - iii. Monitoring and reporting of occupational injuries and any other reportable incidences are done appropriately and effectively.
 - iv. Their sites have appropriate preparedness and emergency response protocol to mitigate internal and external disasters including but not limited to natural calamities, industrial accidents, fire hazards, etc.

5. Business ethics:

- a. Prohibition of corrupt practices: Suppliers shall ensure adherence to the highest standards of moral and ethical conduct, prevailing regulations, and generally accepted good business practices.
- b. Conflict of interest: Suppliers shall promptly communicate to Pakka any instances that may have the potential for a conflict of interest. Suppliers shall disclose if any of Pakka's personnel, officials, staff, or professionals under any contract with Pakka may have an interest of any kind in the Supplier's business.
- c. Gifts and hospitality: Suppliers shall not offer any kind of gifts, free goods, services, or any other hospitality to any of our personnel, officials, staff, or professionals under any contract with Pakka. Supplier shall disclose immediately if any such request has been made by any of Pakka's personnel, officials, staff, or professionals under any contract with Pakka.
- d. Intellectual property: The Supplier shall ensure that all employees' and business partners' privacy and intellectual property rights which includes protection against disclosures, patents, copyrights and trademarks are protected.
- e. Prohibition on insider trading: The Suppliers and their personnel shall not use any material or non-publicly disclosed information for trading of Pakka securities or enabling others for the same.

6. Supplier evaluation:

- a. To ensure compliance with this Code, Pakka may, at its discretion carry out self-assessment surveys, audits and/or inspections and/or delegate an entity to perform these tasks on its behalf.
- b. During such assessments various internal standards, systems and processes, practices, and relevant reports shall be examined and verified. In instances of non-adherence to the provisions of this Code, Pakka shall take necessary corrective actions at its own sole discretion that may include, but not be limited to, capacity building of the Suppliers to take remedial measures, allowing a time as deemed fit by Pakka to take remedial actions, or termination of business relations with the concerned Suppliers.
- c. In case of remedial measures being taken by the Suppliers, it is advised that the Suppliers should adopt relevant frameworks, e.g. Plan-Do-Check-Act (PDCA), for continually improving their operations and tracking the progress.

Compliance with this policy is paramount. All grievances are to be submitted to connect@pakka.com for resolution. Instances of non-compliance will result in prompt and strict disciplinary actions.

Approved by: Seva Sangh

Effective Date: 1st April 2026

Review Cycle: 3 Years

