



VENDOR CODE OF CONDUCT

We, 'Spoton Coatings Private limited', India's largest release paper and release film manufacture Indian organization; aims to become a global vendor for our product in the global emerging market. We have enhanced our pillars of competitiveness, ethics, sustainability, QHSE Compliance, while also improving economic and social conditions of the organization. As an organization, we are committed towards social impact and strive for sustainability across every function, including sourcing and procurement.

In line with our commitment, we have developed a vendor code of conduct, which is an extension of our values and is applicable to all vendors, as appropriate.

Through this code, we intend to make our operations in control manner and at low risk level having various guidelines and controls. The core element will be as below:

MANAGEMENT SYSTEM - SUSTANIBILITY

SPOTON is committed to the highest standards of ethical conduct and social and environmental responsibility. SPOTON expect our Vendors to aspire to these same standards in their business operations and, to have their own documented policies and processes in place addressing the matters detailed herein.

Being a certified organization for QHSE standards, we have system for vendor (Supplier & Service provider) selection, evaluation, re-evaluation. We are committed to follow the same and Purchase Director is direct responsible to maintain the system. One of the critical criteria for selection of vendor is defined as 'Having certified for management system like ISO 9001, ISO 14001 and ISO 45001 etc. Periodic Re-evaluation of the vendor leads the review of vendor performance for the criteria of – quality – quantity and delivery. System is defined to take the action for high-risk vendor having lower rated performance of breach in the applicable requirements.

System is also addressed to conduct the audit of the vendor, if required, considering the nature of supply and context of the vendor. To conduct the audit of giant players like DOW chemicals, Starkraft, UPM and APP is not feasible hence the system is addressed to conduct the periodic review for chain of communication like – verification of website – review of supply chain documents etc.

SPOTON embeds deep commitment to climate action in the core of all areas of our business.

In addition, vendor shall demonstrate they have policies and strategies to identify, prevent, mitigate and account for impacts on the environment in their own operations and their supply base. This shall include without limitation: improving sustainability practices, addressing energy and water usage, reducing greenhouse gas emissions, reducing waste and especially plastics, promoting environmental responsibility and awareness, incorporating eco-conscious decisions into the development of products and services, and incorporating environmental considerations into investment decisions where appropriate.

However, all key vendors for sourcing of paper and chemicals are the multinational corporate like DOW chemicals, Starkraft, UPM and APP, hence we are considered ourself at low risk pertaining to the system implementation and sustainability compliances in our supply chain.

CONTRACTING

System is defined to conduct the contract with the high-risk vendors, under scope of Purchase Director. Contract includes the requirement of QHSE standards, application and monitoring of applicable statutory and regulatory legal compliances, communication practices, DO-DON'TS, Sustainability requirements (If applicable), Health and safety compliances of vendor employees, waste management (If applicable) etc.



WORK ETHICS

Vendor shall abide by the following ethical standards and guidelines:

- Obey all relevant laws
- Treat each other fairly, with dignity and respect
- Prepare all records of financial transactions carefully and accurately
- Report financial conditions and results of operations, honestly and promptly
- Deal honestly and fairly with clients, customers, vendors, and financial partners
- Avoid actual and potential conflicts of interest
- Avoid the improper giving and receiving of gifts
- Safeguard assets of SPOTON in case they are dealing with them
- Protect reputation of SPOTON
- Report observed violations of legal and ethical standards

ANTI BRIBERY AND CORRUPTION PRACTICES

SPOTON seeks to identify Vendors who adhere to the highest ethical standards in their business practices and their interactions. Corruption, bribery, extortion, and embezzlement, in any form, are strictly prohibited. Vendors shall not violate the Prevention of Corruption Act – 1988, The Foreign Contribution (Regulation) Act 2010 (FCRA), The Indian Penal Code 1860 (IPC), which also contains certain provisions relating to breach of trust, cheating and attempt to commit a criminal offence, and any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, bribery, extortion or embezzlement in any form. Vendors shall not offer or accept bribes or other means to obtain an undue or improper advantage, TO or FROM our employees. Vendors must uphold fair business standards in advertising, sales, and competition.

GIFTS; CONFLICTS OF INTEREST

SPOTON employees must not accept gifts, gratuities or excessive entertainment (i.e., beyond nominal, conventional business courtesies, such as an occasional luncheon) from any individual or organization and vendor with which SPOTON has business dealings. Vendor shall further refrain from accepting or giving any gifts, favors, payments, entertainment, loans or the like with a purpose of obtaining any improper advantage or influence for the Vendor, SPOTON or any third party with any client, prospective client or other third party or that create any appearance of impropriety. Vendor must disclose all potential conflicts of interest, including those in which Vendor shall have been placed inadvertently due to either business or personal relationships with customers, vendors, business associates, or competitors of SPOTON, or with other employees. Employees of Vendor shall not act on behalf of SPOTON in any transaction or business relationship involving themselves or members of their family, or other persons or organization with which they or their family have any significant personal connection or financial interest.

PROHIBITIONS AGAINST DISCRIMINATION AND HARASSMENT

SPOTON does not tolerate unlawful discrimination or harassment in the workplace. Vendor must not engage in any unlawful discriminatory or harassing conduct on SPOTON's facilities or directed at anyone in the workplace. Discrimination or harassment based on race, color, religion, national origin, citizenship, ancestry, gender identity, age, disability, marital status, sexual orientation, or other protected characteristic or status is strictly prohibited.

Sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favors, or other visual, verbal or physical conduct of a sexual nature when: (i) submission to such conduct is made, either explicitly or implicitly, a term or a condition of employment; (ii) submission to or rejection of such conduct affects employment opportunities; or (iii) such conduct interferes with an individual's work or creates an intimidating, hostile, or offensive work environment. Examples of sexual harassment include, but are not limited to: sexual gestures, leering, or displaying sexually suggestive objects or pictures; derogatory comments, epithets, slurs, teasing and jokes of a sexual nature; graphic comments about an individual's sex life or body; suggestive or obscene letters, e-mails, notes or invitations; and unwelcome physical contact.

SPOTON may, in its sole and absolute discretion, remove from the premises any vendor who engages in offending conduct. Vendor must promptly report any offending behavior, whether such behavior is directed to vendor or to employees of SPOTON, by notifying any member of management.



COMPLIANCE WITH LABOR LAWS; LABOR STANDARDS

Vendor shall comply with all laws applicable to its business. Vendor shall support the principles of the Employment & Labour Laws and Regulations India 2024, The Code on Wages, 2019 No. 29 of 2019, The Occupational Safety, Health and Working Conditions Code, 2020 No. 37 of 2020, The Code on Social Security, 2020 No. 36 OF 2020, The Industrial Relations Code, 2020 No. 35 of 2020 etc. Vendor shall comply with the respective national laws and regulations regarding working hours, wages and benefits.

CHILD LABOR

Vendor are prohibited from using workers under the legal age of employment where Vendor performs work for SPOTON. SPOTON expect vendors to observe all legal requirements, particularly those pertaining to hours of work, wages, minimum education and working conditions.

DRUG AND ALCOHOL

SPOTON maintains a drug and alcohol-free work environment. No vendor or vendor representative is permitted to possess, consume, sell, or be under the influence of alcohol and illegal drugs (and legal drugs that are not used in a manner consistent with dosage requirements) while in SPOTON facility. Any vendor found to be in violation of this policy may be removed from company premises and not allowed to re-enter. Firearms and any other weapons are not allowed in SPOTON facilities and may not be carried when conducting business. Violent or abusive behavior will not be tolerated.

COMMUNICATION

Vendor shall take appropriate steps to ensure that the principles of this Vendor Code of Conduct are communicated to their employees and throughout their own supply chains, as required. Vendor shall also take appropriate steps to ensure that the principles of this Vendor Code of Code are adopted and applied by their employees, its vendors, agents and contractors to the extent applicable.

ENFORCEMENT

If SPOTON determines that any vendor has violated this Vendor Code of Code, we may either terminate its business relationship or require the vendor to implement a corrective action plan. If corrective action is advised, but not taken, we will suspend placement of future orders and shall terminate business relationship.

REPORTING CONCERNS

Actual, or suspected, material violations by a vendor of this Vendor Code of Conduct shall be reported to info@spotoncoating.com in the first instance. Similarly, if you are a vendor to SPOTON and suspect that a SPOTON employee, or anyone acting on behalf of the firm, has engaged in illegal or otherwise improper conduct, you shall report the matter to info@spotoncoating.com

CHANGES TO THE VENDOR CODE OF CONDUCT

This Vendor Code of Conduct may be revised or updated by SPOTON from time to time. To the extent there is a conflict between this Vendor Code of Conduct and any applicable law or provision of any agreement between SPOTON and Vendor, the applicable law or agreement shall apply.

Handwritten signature in blue ink: Pooja Anil Patel

Date: 01 MARCH 2024 Issue 02 M.D – VIMAL R. PATEL