



# UAIL SUPPLIER CODE OF CONDUCT

Effective from: **April 1, 2024**

First Revision: **August 2023**

Second Revision: **February 13, 2024**

\*Placed before the Board of Directors at its meeting held on February 13, 2024, and reviewed/approved thereat.

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## UAIL SUPPLIER CODE OF CONDUCT

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### Purpose and Scope

Utkal Alumina Industries Limited (“**UAIL/Company**”) has developed a Supplier Code of Conduct (this “**Code**”) to clarify our expectations in the areas of business integrity, human rights, labor practices, associate health and safety, and environmental management. The Code expresses UAIL’s commitment to responsible sourcing while conducting business ethically. Our materials are sourced in a responsible manner that minimizes negative impacts on the environment and society. We are also committed to inculcate sustainable sourcing practices and engage with our suppliers in improving the ESG performance across our supply chain. It explains what it means to act with integrity and transparency in everything we do and in accordance with our unique culture and values. The Code is intended to complement UAIL’s Code of Conduct and the other policies and standards referenced therein. All of the standards mentioned herein emanate from the parent company (Hindalco) Policies (<http://www.hindalco.com/Investor-centre/Policies>) and Aditya Birla Group Policies (<http://sustainability.adityabirla.com/policies.php>).

### **Sustainability**

Sustainability is one of the key components of our decision-making process. We, at UAIL, operating across the process chain from mining till Bauxite refining, strive for excellence in sustainable processes, products and practices to create long term value for all our stakeholders, while conserving resources, protecting environment and enriching societal wellbeing. This Code is developed based on global best practices such as safety, health, environment, human rights, ethical and fair business practices. The Code is aimed at creating a positive impact on the sustainable business practices across UAIL’s value chain and its compliance is a key criterion for selection and partnerships with our suppliers.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services, who do business with UAIL are expected to follow this Code.

### **Business Conduct Principles**

UAIL is committed to (i) conducting its business ethically and in accordance with all applicable laws; (ii) adhering to standards of safety and care for the protection of its employees, the public, and the environment; and (iii) promoting these policies through education, supervision, and regular reviews. UAIL expects its suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

- 1. Maintain awareness and comply with all applicable laws and regulations applicable to their operation.**
- 2. Compete fairly for UAIL’s business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.**

UAIL is committed to conducting business legally and ethically within the framework of a free enterprise system.

UAIL suppliers are expected to:

- Not to offer/accept bribe or do not let others offer/accept bribe on their behalf



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- Not tolerate any forms of corruption, including extortion and bribery, as well as any payment or benefit that may influence government officials, other regulatory bodies or violate the law
- 3. Observe UAIL’s policies regarding gifts and entertainment and conflicts of interest when dealing with UAIL employees.**  
Suppliers are prohibited from providing or offering gifts to UAIL employees that could inappropriately influence UAIL’s business decisions or gain an unfair advantage.
- 4. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.**  
Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience.
- 5. Labor and Human Rights**  
UAIL is committed to respect the fundamental human rights of our workforce and the communities around our operations.  
UAIL suppliers are expected to:
- Respect the personal dignity, privacy and rights of each employee
  - Respect the right to freedom of association of their workers, fair employment policies
  - Not to use any form of forced, bonded, indentured, involuntary prison or slave labor
  - Ensure there is no discrimination based on factors such as gender, nationality, caste, religion or ethnic background for employment and working conditions
  - Follow the local applicable laws of working hours, rest days, wages, overtime and other benefits
  - Provide women employees full protection from sexual harassment at workplace and compliance to the local regulatory requirements
  - Adhere to the minimum employment age limit defined by national law or regulation and comply with relevant International Labor Organization (ILO) standards
  - Respect the right to freedom of association and collective bargaining with incorporation of fair employment policies by the suppliers
- 6. Provide safe and healthy working conditions.**  
UAIL values people as its most important resource and is committed to achieve excellence in Occupational Health and Safety (OHS) management at all locations and expect our suppliers to also make this a priority for their own employees and supply chain.

UAIL suppliers are expected to:



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- Comply with all applicable legal requirements and other requirements related to OHS across all our manufacturing units and follow zero tolerance policy on act of safety violation
- Provide a healthy and safe workplace by identifying potential hazards, evaluating risks and establishing control measures to reduce the identified risks
- Provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment's; emergency aid kits and access to emergency response including environmental, fire and medical

### **7. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.**

As a responsible company, our ongoing endeavor is to manufacture products through processes that have minimum impact on the environment. We maximize ways to preserve the environment through state-of-the-art technology and a commitment to reduce waste in all forms. We expect our suppliers to have necessary systems to minimize the impact of their operations and products on the environment and maintain compliance with government regulations.

UAIL suppliers are expected to:

- Comply with all international, national, and local environmental laws, regulations and permits as applicable to their business operations. Supplier should ensure that their operational permits are valid at all times
- Conserve key resources like electricity, coal, water, oil and raw materials by promoting efficient technologies, manufacturing process improvements, water conservation programs and efficient use of raw materials
- Promote and strengthen the waste management practices by prevention, reduction, reuse, recycle and recover to minimize waste generation
- Adhere to all applicable laws pertaining to deforestation and afforestation
- Act in accordance with applicable standards and regulations for prevention of pollution such as air emissions, effluents discharge, soil contamination etc.
- In adherence with the applicable laws, avoid deforestation, adopt land conservation and afforestation measures, and reduce impacts on biodiversity. Ensure that activities do not disturb the natural habitat and contributes to their restoration.
- Monitor energy consumption and GHG emissions across their operations and take necessary measures to improve energy efficiency and reduce GHG emissions. Increase share of renewable energy source to minimize reliance on conventional energy sources such as fossil fuels.



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### 8. Conflict Mineral

UAIL is committed to maintain transparency in the supply chain and conduct thorough due diligence to ensure that the minerals are not sourced from Conflict Affected and High-Risk Areas (CAHRA). Suppliers shall comply with applicable conflict minerals rules and regulations ensure sourcing of minerals in accordance with the applicable laws and regulations. Suppliers shall adopt policies and processes to ensure the sourcing of minerals from conflict free zones in a socially responsible way.

### 9. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

### 10. Deliver products and services meeting applicable quality.

UAIL is committed to producing high quality and safe products. Suppliers involved in any aspect of developing, handling, packaging, or storing our products are expected to:

- a. Know and comply with the product quality standards, policies, specifications, and procedures that apply to the products produced at their location.
  - i. Follow and adhere to good manufacturing practices and testing protocols
  - ii. Comply with all applicable central, state, and local laws and regulations
  - iii. Report issues immediately to UAIL that could negatively affect the quality or public perception of a UAIL product

### 11. Support compliance to this Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by UAIL.

To conduct business with Company, suppliers should enter into contracts and execute purchase orders that mandate compliance with this Code. With prior notice, UAIL may conduct reasonable audits to verify Supplier's compliance with this Code.

### 12. While, we as a company strive to implement the standards outlined in this Code within our own operations and expect our suppliers to do the same, we also ask that your company expects its suppliers to adopt similar standards through a policy of your own, applicable to your suppliers. By seeking to influence the adoption of responsible guidelines and standards within your supply chain, we can work together to make a positive impact on society

In case of any potential violation or related queries please contact

Email ID	Toll-free Hotline	Web Portal
<a href="mailto:abg.ethicshelpline@integritymatters.in">abg.ethicshelpline@integritymatters.in</a>	1800-102-6969	<a href="http://abgethicshelpline.integritymatters.in">abgethicshelpline.integritymatters.in</a>

All such reports are treated as confidential and you may remain anonymous wherever permitted by law.



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In case any violation of this Code is identified, the applicable supplier might, at UAIL's discretion, be given time to remediate the problem, with UAIL's assistance wherever possible. If the problem is not addressed in an effective way and within a clear timeframe that is acceptable to UAIL, UAIL reserves the right to terminate its business relationship with the violating supplier. UAIL also reserves the right to blacklist such suppliers from the Aditya Birla Group of Companies.

The undersigned acknowledges that it has read and understands the UAIL Supplier Code of Conduct and agrees to adhere to the provisions of the UAIL Supplier Code of Conduct

**Supplier Name:** \_\_\_\_\_

**Signer's Name and Designation:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

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