



ADITYA BIRLA GROUP



Birla Cellulose
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Birla Cellulose

Supplier Code of Conduct

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SUPPLIER CODE OF CONDUCT

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1.0 Company Values and Vision

Integrity. Commitment. Passion. Seamlessness. Speed. These together constitute our “Values”. “These values are the foundation of the company's success and guide its decisions, actions, and strategies.

Integrity

Acting and making decisions in a manner that is fair and honest. Following the highest standards of professionalism and being recognized for doing so. Integrity for us means not only financial and intellectual integrity but encompasses all other forms of integrity.

Commitment

On the foundation of integrity, doing all that is needed to deliver value to all stakeholders. In the process, being accountable for our own actions and decisions, those of our team and those in the part of the organization for which we are responsible.

Passion

An energetic, intuitive zeal that arises from emotional engagement with the organization that makes work joyful and inspires each one to give his or her best. A voluntary, spontaneous and relentless pursuit of goals and objectives with the highest level of energy and enthusiasm, which is voluntary and spontaneous.

Seamless

Thinking and working together across functional groups, hierarchies, businesses and geographies. Leveraging diverse competencies and perspectives to garner the benefits of synergy while promoting organizational unity through sharing and collaborative efforts.

Speed

Responding to internal and external customers with a sense of urgency. Continuously striving to finish before deadlines and choosing the best rhythm to optimize organizational efficiencies.

2.0 About Birla Cellulose

Birla Cellulose is part of the Aditya Birla Group. Birla Cellulose is among the global leaders in Man-made Cellulosic Fibre (MMCF) industry and produces a complete range of MMCF spanning all the three generations of fibres viz. viscose staple fibre (VSF), modal & lyocell.

Birla Cellulose comprises of pulp & fibre manufacturing operations of Grasim Industries Ltd., India; Thai Rayon Public Co. Ltd., Thailand; PT Indo Bharat Rayon, Indonesia; Birla Jingwei Fibres Co. Ltd., China; AV Group NB & AV Terrace Bay, Canada and Domsjo Fabriker AB, Sweden.

Birla Cellulose aspires to be the global leader in Sustainable Business Practices in the MMCF industry. Sustainability is a key component in our decision-making process and is integral part of our business strategy. We have committed ourselves to the principles of sustainability. The ‘Supplier Code of Conduct’ of Birla Cellulose is developed in line with the Aditya Birla Group Supplier Code of Conduct and is based on global best practices for safety, health, environment, human rights, ethical and fair business practices. Birla Cellulose’s endeavor is to procure sustainable goods and services that represent best price, quality, delivery and technological offering. Our Suppliers are one of our most valuable stakeholders and most important business partners. For this reason, it is important for us to collaborate and ensure long-term sustenance of all our Suppliers.

We are committed to create a supply chain that is resilient and viable in the wake of risks and opportunities potentially arising from the external legal, technological, environmental and societal megatrends as part of our business future-proofing program. We would like to actively engage and partner with our Suppliers and discuss our approach and collective actions on building sustainable business models.

Vision

To be the global leader in the man-made cellulosic fibres (MMCF) industry

Mission

We aim to create superior and sustainable value for all our stakeholders, the majority of market share in the man-made cellulosic fibre (MMCF) industry globally through:

- Innovation in product and process
- Excellence in quality, service, people development and
- Focus on sustainability across the value chain

3.0 Purpose and Scope

The 'Supplier Code of Conduct' is aimed at creating a positive impact on the sustainable business practices across its value chain and its compliance is a key criterion for selection and developing partnerships with our Suppliers. All the material or service Suppliers of Birla Cellulose are expected to fully understand the requirements of this Supplier Code of Conduct and apply it within their operations and in all their dealing with Birla Cellulose.

In dealing with vendors, no decision and / or action will be influenced by any personal favour and/or any extraneous factor other than in the normal course of business.

Embodying the above principle, this code of conduct is prepared to cover all Suppliers of goods and services, contractors, consultants, agents, intermediaries, etc. (collectively referred to as "Supplier" or "Suppliers") who do business with Birla Cellulose or intend to do business with the Company.

The Key areas of focus for this Code is:

- (i) Human Rights & Labour
- (ii) Environment
- (iii) Occupational Health & Safety
- (iv) Governance
- (v) Community

All Suppliers are expected to read and understand this Code. In doing so, each Supplier has the responsibility to recognize, and to avoid or to prevent situations that may cause possible violations of this Code throughout their supply chains. If the Supplier requires clarification regarding the applicability and content of the Code, such queries can be directed to Birla Cellulose through email.

4.0 Supplier Code of Conduct

Suppliers shall ensure compliance with applicable local laws, rules & regulations, and processes, policies, and procedures developed to ensure compliance with all applicable laws, industry regulations, and private contracts governing the actions of the organization. Suppliers shall

establish a process to identify the applicable regulations related to the supplier code of conduct and to track any amendments or updates to these regulations that may impact their compliance with the code. Suppliers shall identify all relevant compliance obligations related to sustainability issues, including laws, regulations, permits, agreements, and commitments. They should also consider laws and regulations in countries where products may be sold and adhere to relevant international standards and commitments.

The compliance requirements may include, but are not limited to, the following as applicable:

- Laws and regulations (federal, state and local)
- Permits, licenses or other forms of authorization
- Orders, rules or guidance issued by regulatory agencies
- Judgments of courts or administrative tribunals
- Treaties, conventions and protocols

If any part of this Code conflicts with local laws in any location, the more stringent standard between the Code & the local law shall be applicable.

The Code has 5 subsections that the supplier is expected to conform to.

4.1 Human Rights & Labour

4.1.1 Forced Labour & Human Trafficking

- i. Supplier should not engage in or benefit from, in any manner whatsoever, forced or compulsory labour. Any labour without free consent including but not limited to unpaid or indentured servitude (Indentured servitude is a labour contract where an individual will work to repay an indenture or loan over some time, commonly several years), labour under abuse or threats of physical abuse or otherwise, or labour under any form of harassment would be deemed as forced labour.
- ii. Supplier shall not engage in any manner whatsoever with any entity that practices or is known to practice forced labour as defined above.
- iii. Supplier shall ensure that employees, workers, contractors or subcontractors across its supply chain are not subjected to arbitrary harassment measures such as confiscation of passport, withholding of wages or unreasonable penalties.
- iv. Supplier shall provide training to all its employee, contractors and subcontractors in their local languages to raise awareness of issues of forced labour and encourage reporting of violations to the relevant government authorities, the respective Suppliers and to Birla Cellulose.

4.1.2 Child Labour

- i. Suppliers are strictly prohibited from benefiting from or utilizing in any manner, including as employees, contractor or subcontractor, child labour that is in violation of the local laws and regulations.
- ii. Irrespective of the local regulations, Suppliers are not permitted to utilize or engage children below the age of 16 or legal minimum age for employment.
- iii. Workers below the age of 18 or legal minimum age of employment are not permitted to undertake any work that is mentally, socially, physically, morally harmful or any work that could interfere with their schooling needs.
- iv. Supplier shall be responsible for ensuring compliance with child labour laws across its associated stakeholders. Supplier shall formulate and circulate relevant policies to raise awareness for child labour and encourage reporting of violations to the relevant government authorities, the respective Suppliers and to Birla Cellulose.

- v. The Supplier must take immediate action to remove any children found performing labor in its supply chain and ensure they have access to education.

4.1.3 Anti-Discrimination & Humane Treatment

- i. Suppliers shall ensure that Employees and workers are not discriminated based on race, nationality, regionality, affinity, colour, religion, caste, creed, affiliation, gender, sexual preferences, age, physical ability, political preferences, pregnancy, marital status or family status.
- ii. Suppliers must ensure fair and non-discriminatory practice in all aspects including hiring, promotions, assignments, wage hikes, training, and termination.
- iii. Suppliers shall ensure that its workers, contractors, and applicants are not subject to arbitrary and discriminatory medical tests like HIV test, genetic tests, pregnancy test or tests that may be used to determine a person's mental health status.
- iv. Suppliers are expected to treat their workers, contractors, and applicants with dignity and respect. They must not be subjected to any form of or threat of physical, psychological, sexual, or verbal harassment.
- v. Suppliers shall ensure workers, contractors and applicants are provided with a safe and healthy working environment.
- vi. Suppliers should avoid imposing arbitrary or dehumanizing sanctions on workers, contractors, or employees, including denying them access to basic necessities like drinking water, sanitation facilities, and common areas such as restrooms during their breaks or leisure time.
- vii. Suppliers shall formulate, communicate, and establish rules and standard for workplace behavior and humane treatment of their employees and their supply chain based on accepted international, national, or industry standards. Any violation of the rules and standard should attract appropriate disciplinary action and sanctions.
- viii. Suppliers shall proactively initiate diversity initiatives and take measures to improve inclusivity at the workplace.
- ix. The supplier must establish and uphold a process for identifying human rights risks related to its operations. The supplier is required to assess the relative significance of each identified risk and implement suitable procedures and controls to mitigate those risks.
- x. The supplier is prohibited from sourcing materials originating from high-risk regions, which include areas associated with conflict and human rights violations.
- xi. Suppliers shall avoid procuring or sourcing from vendors and/or areas known to be associated with any human rights violation.

4.1.4 Working Hours, Wages & Benefits

- i. Suppliers shall ensure compliance with applicable minimum wage regulations and working hours regulations across their supply chain.
- ii. Suppliers shall ensure proper communication of wages, benefits, wage schedule, overtime wage and working hours with appropriate documentation to their employees, contractors, and subcontractors.
- iii. Suppliers shall ensure adherence to working hours and timely payment of overtime wages whenever appropriate. Overtime should be voluntary, and the worker should not face retaliation for refusal to do overtime work.
- iv. Suppliers are required to allow their workers adequate rest. Workers are entitled to a minimum of 24 consecutive hours per week as rest.

- v. Suppliers shall not withhold or deduct wages for any reason, including disciplinary actions or recruitment fees, unless it is required by law, or the worker gives their express written consent.
- vi. Suppliers shall provide workers with transparent employment records including attendance and payroll records.
- vii. Suppliers shall formulate and communicate a long-term compensation for their workers that specifies the expected growth in wages and benefits growth.

4.1.5 Freedom of Speech, Association & Collective Bargaining

- i. Suppliers shall ensure that every worker is entitled to their free speech to the extent permitted by law.
- ii. Unless restricted by law, Suppliers must allow workers to exercise freedom of association and collective bargaining for occupational interests including the right to form, join and/or refuse to join associations, unions, or organizations.
- iii. Suppliers shall not interfere or influence, including through incentives, sanctions or discrimination, decisions of employee/s or their associations.
- iv. Suppliers shall ensure that workers do not face retaliation for reasonable expression of their beliefs or opinions.
- v. Suppliers must prevent and protect employees from being targeted or discriminated against for exercising their freedom of association.
- vi. Suppliers shall establish a process for grievance redressal to resolve disputes, internal complaints and ensure transparent communication amongst employees, their representatives, and the management. Suppliers should ensure that employees are provided with appropriate protection through measures like anonymity while raising concerns.
- vii. Suppliers should pro-actively promote and facilitate exercise of collective rights by the employees including but not limited to providing representatives with a communication channel to the management and allowing associations to organize their activities on the premises.

4.2 Environment

4.2.1 Environmental Laws & Record-Keeping

- i. Suppliers shall ensure compliance with all applicable environment laws and regulations across its supply chain.
- ii. Suppliers must take measures to minimize their environmental impact, and document, review, and track their efforts to ensure their effectiveness. If there are any significant environmental impacts, suppliers are required to share the details with the company.
- iii. Suppliers should maintain all necessary and up-to-date environmental permits, approvals and registrations and reporting requirements. These records should be available for inspection by Birla Cellulose as and when required.
- iv. Supplier should try to obtain ISO 14001 or equivalent certification for environment management systems.

4.2.2 Hazardous Substances

- i. Suppliers shall ensure compliance with all relevant and regulations in use, storage and disposal of hazardous materials including chemicals.

- ii. Suppliers shall put in place measures to prevent or mitigate accidental exposure to or spills of hazardous substances. These measures should be periodically collated and reported to Birla Cellulose.

4.2.3 Circularity – Sourcing & Recycling

- i. Suppliers shall comply with local laws and regulations on waste disposal, waste segregation, waste treatment and recycling.
- ii. Suppliers must ensure transparency by tracking any materials or products sourced throughout the supply chain including its origin and production facility.
- iii. Suppliers shall ensure that all materials are sustainably sourced and adhere to all applicable laws and regulations through its supply chain. Tracking information of the materials should be made available to Birla Cellulose.
- iv. Suppliers should utilize measures such as waste management, materials substitution, segregation & labelling, to increase recyclability of materials and reduce waste.
- v. Suppliers should strive to use recyclable or compostable packaging materials.
- vi. Suppliers should prioritize the use of widely recyclable materials, including non-coated paper and cardboard, aluminum, glass, and type 1 (PET or PETE) and type 2 (HDPE) plastics, for at least a significant portion of their packaging.
- vii. Suppliers must strive to create and implement a comprehensive zero-waste plan and periodically report its progress to the Company.
- viii. Supplier should adopt best practices for wastewater treatment. The supplier shall conserve and reduce their usage of water by using treated recycled water from its waste treatment plant and harvested rainwater.

4.2.4 Greenhouse Gas (GHG) emission

- i. Suppliers should define an action plan to monitor and reduce air pollution and greenhouse gas emissions in their supply chain.
- ii. Supplier must actively measure, manage and report environmental impacts of Greenhouse Gas (GHG), including Scope 1, 2, and 3 emissions.
- iii. Suppliers must set targets and implement action plans, referencing recognized management systems like ISO 14001 and the Eco Management and Audit System (EMAS), to achieve net zero greenhouse gas emissions by 2050, in alignment with the GHG protocol.
- iv. Supplier's net zero program should be easily accessible, and progress must be publicly communicated on a yearly basis.
- v. Supplier should annually research and develop/implement new technologies to reduce their GHG.
- vi. Supplier must have an improvement program in place with their partners to reach net zero on their GHG emissions.
- vii. Supplier must communicate plans on supplier base selection aligned with their net zero target to their partners.
- viii. Suppliers may not use ozone depleting substances (ODS) or hydrofluorocarbons (HFCs).

4.2.5 Environmental Impact

- i. Suppliers shall adhere to all applicable laws and regulations regarding environmental pollution, including but not limited to laws on deforestation, biodiversity conservation, greenhouse gas emissions, wastewater discharge, and any other relevant laws.

- ii. Suppliers are prohibited from conducting any operations within areas including buffer zones that are recognized as globally or nationally important for their biodiversity. This includes, but is not limited to, protected areas such as national parks, wildlife reserves, eco-sensitive zones, and other areas designated for conservation purposes.
- iii. If a supplier is operating in areas that are near critical biodiversity, they must apply the mitigation hierarchy, which includes avoiding impacts on biodiversity where possible, minimizing impacts where avoidance is not possible, restoring any damage caused, and offsetting any residual impacts.
Supplier shall actively reduce usage of resources and material that threaten biodiversity and/or encourage deforestation. Suppliers shall not make use of any resource that has long term impact on biodiversity.
- iv. Suppliers shall recognize the risks of climate change and take proactive measures to minimize and manage their impact. Suppliers should assess the potential physical risks posed by climate change, including but not limited to natural disasters and extreme weather events, and develop contingency plans to mitigate the impact of such risks on their operations, supply chains, and the environment.
- v. Suppliers are required to track and report on all emissions generated during their procurement activities for the company. This includes emissions from transportation, manufacturing, and other relevant sources. This information should be available in a clear and easily understandable format and include all relevant data such as the quantity of emissions, the emission source, and the period in which the emissions were generated. Furthermore, the supplier must provide this information to Birla Cellulose upon request.
- vi. Suppliers should ensure efficient use of natural resources such as water and energy.
- vii. Suppliers shall take active steps to reduce the use of non-renewable sources in their energy use either through reducing consumption through improving energy-efficiency or utilizing alternative non-polluting sources of energy.
- viii. Suppliers should define an action plan to monitor and reduce air pollution and greenhouse gas emissions in their supply chain.
- ix. Suppliers shall monitor and reduce freshwater consumption and wastewater generation by measures such as reducing water use, reuse, and recycling, appropriate wastewater treatment, and rainwater harvesting.
- x. Suppliers should strive to reduce the adverse environmental impact of their supply chain.
- xi. The supplier must keep records and share information about their energy usage, including electricity, gas, fuel, steam, etc.
- xii. They should monitor trends in energy usage in relation to their output, such as the number of products or the weight of materials processed.
- xiii. Supplier must implement their own No Deforestation Policy and proactively prevent deforestation by implementing policies and systems to replace resources that they use (ex. use a tree/plant a tree).

4.3 Occupational Health & Safety

4.3.1 Occupational Health

- i. In accordance with local laws and regulations, suppliers shall ensure that employees, contractors, and subcontractors are provided with a safe and healthy working environment including but not limited to:
 - a. First Aid & Emergency Medical Response

- b. Compliance with the WASH pledge for general sanitation and hygiene including unrestricted access to toilets and potable water, and sanitary food preparation, eating and storage facilities.
 - c. Medical facilities including routine medical checks and vaccination.
 - d. Access to gender-specific, changing rooms and dormitories if provided.
 - e. If the supplier is not able to provide such amenities, clear rationale with a proposed alternative should be formalized with the employees and made available.
- ii. Suppliers shall conduct risk assessments to identify, evaluate, and control worker exposure to any chemical, physical and biological agents according to the hierarchy of controls through proper design, engineering, and administrative controls. Suppliers shall protect workers' health by adopting appropriate personal protective equipment.
 - iii. Suppliers shall conduct risk assessments to identify, evaluate, and control worker exposure to the hazards physically demanding tasks, including, but not limited to, manual material handling, repetitive lifting, awkward postures, prolonged standing and or highly repetitive assembly tasks.
 - iv. Occupational health concerns of workers should be tracked, investigated and documented. Supplier shall provide adequate compensation, monetary or otherwise, to workers that suffer from occupational health concerns. These incidents should be adequately documented and made available to Birla Cellulose for inspection.
 - v. Suppliers shall clearly post health and safety-related information in the workplace that complies with local laws and industry standards (apply the highest standard) in employees' primary language.
 - vi. Supplier shall take a proactive approach to minimize occupational illness including tackling mental health concerns and concerns related to ergonomics.

4.3.2 Safety

- i. In accordance with local laws and regulations, suppliers shall ensure safety of all employees, contractors, subcontractors and visitors.
- ii. Suppliers should routinely carry safety risk assessment checks in their supply chain.
- iii. Supplier shall routinely inspect machinery to reduce risk of accidents. Suppliers should also undertake adequate measures such as installation of barriers, engineering controls, and physical guards to reduce workers' exposure to safety hazards.
- iv. Suppliers must ensure adequate training and safeguards for employees involved in handling of hazardous materials.
- v. Suppliers shall provide workers with regular training in health and safety procedures in their local language.
- vi. Work-related injuries of workers should be tracked, investigated, and documented. Supplier should provide adequate compensation, monetary or otherwise, to workers that suffer from work-related injuries. These incidents should be documented and made available to the Company for inspection.
- vii. Supplier should try to obtain ISO 45001 or equivalent certification for safety management systems.

4.3.3 Emergency Preparedness

- i. Supplier shall maintain compliance with all local laws and regulations on emergency hazards, for example fire safety, leakages and others, and also for natural disaster and crisis management.

- ii. Suppliers should ensure adequate preparation, such as unlocked and clear exits, installation of smoke alarms, marking safe assembly places, evacuation plans for disasters or emergencies.
- iii. Suppliers shall routinely conduct training and drills for their workers to ensure adequate disaster response.
- iv. Suppliers should prepare emergency response plans and brief workers in advance to ensure safety of workers during emergencies.

4.4 Governance

4.4.1 Business Ethics – Conflict of Interest & Fair Competition

- i. Supplier shall ensure complete compliance with applicable local laws and regulations including financial laws, taxation laws, competition laws, antitrust laws and insider trading regulations.
- ii. Suppliers should uphold high level of business ethics in their conduct including maintenance of business records.
- iii. Suppliers shall avoid actions or conditions that could result in a conflict of interest, actual or perceived. Any instance of such conflict must be reported to Birla Cellulose.
- iv. Suppliers should not indulge in uncompetitive practices such as price fixing or cartelization.
- v. If Birla Cellulose staff or former employees participated in the procurement process, suppliers shall not offer them employment for one year following separation from service.
- vi. The Supplier shall ensure that their employees have authorization to access or use Birla Cellulose assets, properties, information, and intellectual rights for official purposes only, according to the terms of the Supplier's engagement with Birla Cellulose.
- vii. Handle and store all documentation securely, protecting sensitive information from unauthorized access, use, or disclosure.

4.4.2 Bribery, Kickback & Corruption

- i. Supplier shall not give or receive any financial benefits, meals, entertainment, or any other benefit with the intention of improperly influencing actions performed or decisions taken in good faith. Any action, regulatory or otherwise, initiated against the supplier due to improper behavior must be immediately reported to the Company.
- ii. Supplier should maintain an internal investigation mechanism to identify and penalize instances of improper conduct by workers, contractors or subcontractors.
- iii. Supplier should provide periodic internal training to prevent instances of improper conduct.
- iv. Suppliers must compete in an independent, open and fair manner and not knowingly enter into business arrangements that eliminate or discourage competition, or that provide them an improper competitive advantage.

4.4.3 Privacy, Intellectual Property, Confidentiality & Data Protection

- i. Suppliers shall ensure compliance with relevant laws and regulations concerning privacy, intellectual property, and data protection across its supply chain.
- ii. Suppliers should ensure creation, maintenance, storage and disposal of data including business records, employee information and intellectual property maintaining confidentiality and compliance with local laws and regulations.

- iii. Suppliers shall ensure adequate cyber security measures for data protection based on industrial standards. Supplier should regulate internal access to sensitive data including records of employees, intellectual property, or other critical and sensitive documents from Birla Cellulose.
- iv. Suppliers shall immediately inform relevant stakeholders including their workers and Birla Cellulose in case of a security breach or a data leak or any manner of compromise in the integrity of the data including intellectual property of the Company.
- v. Suppliers must obtain prior permission from Birla Cellulose before using the company logo or products. Additionally, suppliers must not misuse Birla Cellulose logo or misrepresent its products. Any engagement in malicious propaganda is strictly prohibited.

4.4.4 Monitoring & Compliance

- i. Suppliers shall ensure compliance with this Code by their employees, contractors and subcontractors.
- ii. Suppliers shall comply with all applicable local, national, and international regulations and standards related to environmental, health, and safety labeling of their products. This includes but is not limited to requirements for hazard communication, product labeling, and the provision of safety data sheets (SDS).
- iii. Suppliers are advised to create their own sustainability policies that are consistent with Birla Cellulose policies and Sustainability strategy. Alternatively, suppliers may choose to directly implement Birla Cellulose policies to ensure their practices meet our expectations.
- iv. Workers shall have access to an appropriate platform with adequate safeguards such as anonymity to report violations of the Code.
- v. Supplier should create and implement a whistleblower policy to protect whistleblowers against retaliation.
- vi. Supplier should periodically prepare a consolidated report on compliance with the Code and information on instances of violation and investigation into such violations.

4.5 Community

4.5.1 Community Engagement

- i. Suppliers should engage the local communities to foster their social and economic development.
- ii. Suppliers should bring about tangible improvements in the educational, cultural, social and economic well-being of the local communities.
- iii. Suppliers shall promptly address and resolve any community grievances by implementing appropriate measures and taking proactive actions.
- iv. Supplier should contribute to long-term infrastructure and societal improvement efforts in the community where they operate to make a positive difference.

4.6 Enforcement

To ensure compliance to this Supplier Code of Conduct, Birla Cellulose may, at its discretion carry out surveys, audits and/or inspection.

If any violation of this Code is identified, the supplier in question may, at the discretion of Birla Cellulose, be given time to rectify the problem, with the Birla Cellulose's assistance wherever

possible. If the issue is not resolved effectively and within an acceptable timeframe, Birla Cellulose reserves the right to terminate its business relationship with the violating supplier and blacklist them from the Aditya Birla Group of Companies.

4.6.1 Grievance Redressals

- i. All employees, contractors and subcontractors of the Supplier can report non-compliance of the Code directly to Birla Cellulose through email at : supplychain.bc@adityabirla.com.
- ii. Suppliers should circulate and publicize the Birla Cellulose grievance redressal contact.

Name and Signature of Authorized Signatory: _____

Seal of the Supplier with Date: _____