



## **SUPPLIER SUSTAINABILITY POLICY**

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### **PURPOSE:**

This policy defines WIL's requirements regarding the way suppliers act in their corporate activities. The requirements are considered a basis for successful business relations between WIL and its suppliers. This policy also defines WIL's requirements for responsible sourcing of materials.

### **SCOPE:**

The sustainability requirements stated in this document apply to all business relationships between WIL and its suppliers.

### **POLICY:**

#### **1 WIL's sustainability values**

Sustainability is a key priority for WIL and WIL works to continuously improve the sustainability performance throughout its value chain. WIL is committed to upholding the principles relating to human rights, labour practices, environment and anti-corruption in its own operations as well as in the supply chain. Accepting and complying with WIL's social and environmental requirements, is a prerequisite for doing business with WIL. The supplier's social policies and requirements must be communicated to their own suppliers and sub-contractors. Suppliers shall also aim to contractually bind their suppliers to corresponding environmental and social policies and requirements.

WIL requires suppliers to have appropriate management procedures and documentation to be compliant with WIL's requirements, as set forth in this document. WIL also requires continuous performance improvements. WIL may at any time review and/or request supplier self-assessments and/or perform on site audits at the Supplier's locations, normally pre-announced.

Responsible Sourcing of Materials is a key priority for WIL and WIL works to ensure the principles of responsible sourcing of materials throughout its value chain. WIL may perform on site audits at the Supplier's locations for verification of compliance to the requirement of this policy.

No claims arising from these requirements may be made by third parties.



## **2 Requirements**

### **2.1 Environmental protection**

WIL takes responsibility for continually improving the environmental performance of its products and services as well as for reducing the use of natural resources, whilst taking economic factors into account. WIL therefore requires its suppliers to comply with all applicable environmental legislation and regulations in all countries in which they operate.

### **2.2 Reporting of Part Material Composition**

For direct product related parts WIL requires transparency on the materials and substances used in products supplied to WIL. Such transparency includes reporting to IMDS (International Material Data System). MDS for indirect material (non-automotive, non-product related) parts shall only be reported on request.

### **2.3 Environmental Management System (EMS)**

WIL requires its suppliers for products and services affecting the environment to obtain ISO 14001 certificate or at least Pollution Control Board certificate. This is applicable to suppliers of steel, paint, welding electrode, fasteners, fuels & oils, pickling, shot-blasting and heat treatment.

### **2.4 Waste and recycling**

Avoiding waste via recycling and re-using resources, as well as safe disposal of residual waste, shall be considered during development, production and service life of products, production processes and other activities and during the development and execution of production processes and other activities.

### **2.5 Employee and human rights**

WIL and its suppliers have the responsibility to respect and support human rights in all their areas of operations.

WIL requires its suppliers to,

- Respect the basic right of employees to freely, voluntarily and without interference establish and join, or not join, unions and employee representation of their own choice and to bargain collectively.
- Suppliers shall not practice any form of discrimination - ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social origin or political view.
- Rejects the use of forced or compulsory labour.
- Pay in time the applicable legal wages and other legally mandated benefits and compensation in a transparent way.
- Respect the Laws and regulations on maximum number of working hours and time off.



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- Not accept child labour.
- To ensure good working conditions and take appropriate measures to ensure health and safety at the workplace.
- Commit to conducting business ethically and in accordance with the law, be reasonable and transparent.
- Reject and prevent all forms of corruption.
- Ensure that personal interests or relationships do not influence decision making, only objective criteria are observed.

### 2.6 Responsible sourcing

- WIL conducts due diligence to understand the source of raw materials used in their products.
- WIL expects its suppliers to ensure that the raw material used by them do not knowingly contribute to human rights abuses, bribery, ethics violations or negatively impact the environment.
- WIL requires its steel suppliers to do self-declaration on Conflict Minerals-Free status (tantalum, tin, tungsten or gold) in the process of manufacture of their products.

### 2.7 Privacy and data protection

WIL requires its suppliers to sign a Non-Disclosure Agreement (NDA) to ensure confidentiality of WIL's proprietary data, drawing, specification, standards or other such important information. Vital communication between WIL and the suppliers shall not be shared by the suppliers in any form without the prior consent of WIL.

### 2.8 Fair competition and anti-trust

WIL engages in fair competition with their suppliers and expects the same from their suppliers. WIL shall not allow their suppliers to indulge in any kind of anti-trust activity.

### 2.9 Conflicts of interest

WIL expects its suppliers not to indulge in any activity or operations which lead to conflict of interest with any other interested party, directly or indirectly.

1. **Environmental:** Suppliers to WIL are expected not to allow any activity which would have a detrimental impact on the environment. For e.g., if a supplier has pickling as an operation, they are expected to follow the statutory regulations and procedures for disposal of used chemicals and proper EFT. Suppliers shall be responsible for ensuring that there is no negligence w.r.t. preservation and conservation of environment.
2. **Commercial and ethical:** Suppliers to WIL are expected not to permit any situation, in which a person or entity, is in a position to derive personal benefit, direct or indirect, financial or non-financial, from actions or decisions made in their official capacity. For eg., nepotism, benefit to family business.



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### 2.10 Whistle blowing and protection against retaliation

WIL expects a high level of integrity in the association between their suppliers. In this regard WIL encourages its suppliers to engage in whistleblowing and assures to protect the interests of the whistleblower against retaliation of any kind.

### 2.11 Water quality and consumption

WIL expects its suppliers to have strict monitoring methods to ensure that appropriate quality of water is consumed by them in their operations and also to measure the consumption of water to avoid wastage of water at any stage.

### 2.12 Sustainability requirements for your own suppliers

The CSR and sustainability requirements and expectations detailed in this policy should be cascaded down the supply chain of WIL's suppliers.

### 2.13 Review of suppliers' fulfilment of WIL's sustainability requirements

WIL has the one or more of the following process for monitoring the fulfilment of sustainability requirements by suppliers:

- **Self-Assessment Questionnaire (SAQ):** Suppliers are expected to submit the SAQ communicated to them by email. Recommendations in the report provided by WIL for the SAQ are to be implemented by the supplier for improvements.
- **2<sup>nd</sup> party audit:** WIL shall carry out 2<sup>nd</sup> party audit of the suppliers to ensure that they are meeting the requirements specified in the contract.
- **3<sup>rd</sup> party audit:** Sustainability reports of 3<sup>rd</sup> party audits performed by independent organization such as registrars, certification bodies or regulators.