



## WHEELS INDIA – SUPPLIER CODE OF CONDUCT

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### **PURPOSE:**

This Code of Conduct (CoC) defines Wheels India Limited's (WIL) 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. The CoC 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.

### **SUSTAINABLE PROCUREMENT POLICY:**

Sustainability and Responsible Sourcing are key priorities for WIL.

WIL strives to continuously improve the sustainability performance and ensure the principles of Responsible Sourcing of materials, 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, environmental and ethical requirements listed in this document, is a prerequisite for doing business with WIL.
- WIL's social, environmental and ethical policies and requirements must be communicated by the suppliers to their own suppliers and sub-contractors.
- Suppliers shall 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 for its suppliers on sustainability objectives/ goals.
- 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.

**CONTROLLED**

Jul 2024

Reviewed by:

Approved by:



## 1 Requirements

### 1.1 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.
- Suppliers to WIL shall ensure to protect the land, forest and water rights of the people and not adopt any means of forced eviction.
- WIL expects its suppliers to take care of the air quality of their premises.
- Suppliers shall endeavor to set time-bound goals/objectives for emission reduction and renewable energy and ensure measures that drive decarbonization of the value chain.
- Suppliers shall reduce, reuse and recycle water including responsibly treating any waste water discharge to protect the environment and improve the overall water quality.

### 1.2 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.

### 1.3 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.

### 1.4 Waste and recycling

Avoiding waste via recycling and re-using resources, as well as safe disposal of residual waste, shall be taken into account 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.

### 1.5 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 color, gender, religion, nationality, sexual orientation, social origin or political view. Suppliers are expected to support diversity, equity and inclusion.
- 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.



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- Respect the Laws and regulations on maximum number of working hours and time off.
- Not accept child labor.
- 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.

### 1.6 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.
- **Responsible chemical management:** Suppliers to WIL shall work to limit and restrict their number of chemical products and select chemicals with lowest possible health and environmental risk

### 1.7 Privacy and data protection & Intellectual Property

- 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.
- Suppliers to WIL shall ensure protection of the Intellectual Property of WIL.

### 1.8 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.

### 1.9 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 with respect to preservation and conservation of environment.



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- 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 e.g., nepotism, benefit to family business.

### 1.10 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.

### 1.11 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.

### 1.12 Energy Efficiency

- WIL expects its suppliers to adopt efficient energy management systems in their operations.
- WIL encourages its suppliers to explore ways and means for renewable energy.

### 1.13 Sustainability requirements for your own suppliers

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

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

WIL has the one or more of the following processes 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.

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### 1.15 Compliance with the Supplier Code of Conduct (CoC).

- Suppliers are required to adhere to this CoC. They shall promptly inform WIL when any situation develops that causes them to operate in violation of this CoC.
- Suppliers are expected to self-monitor and demonstrate their compliance with this CoC.
- Suppliers shall allow WIL to audit/ assess/ inspect their facilities to confirm their compliance when requested by WIL with reasonable notice.
- Suppliers and/or individuals acting on their behalf, who wish to report questionable behavior, or possible violation of the CoC, known or suspected behavior relating to the suppliers' and/or individual's dealings with WIL, such behavior by WIL employees, may do so by email to [vigilmechanism@wheelsindia.com](mailto:vigilmechanism@wheelsindia.com).

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Jul 2024

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