



Supplier Code of Conduct

Kutch Copper Limited

INTRODUCTION

At Kutch Copper Limited (KCL), integrity is at the core of our operations. As an emerging global player in the copper industry, we prioritize ethical conduct, legal compliance, and social responsibility. This Supplier Code of Conduct outlines the key ethical, legal, and environmental standards we expect all suppliers to meet, regardless of the products or services they provide

We hold both ourselves and our partners to high standards, expecting adherence to relevant laws, fair labour practices, and respect for human rights. Environmental responsibility is equally important, with a focus on resource management and waste reduction. By partnering with suppliers who share these values, we aim to foster sustainable, long-term relationships that drive mutual success and maintain excellence.

This guide covers governance, social responsibility, and environmental best practices, reflecting our commitment to building partnerships that go beyond the business of copper. Together, we will ensure compliance, safety, and continuous pursuit of excellence.

"Supplier" here refers to any individual, corporation, partnership, or other legal entity that provides goods, materials, services, or other deliverables to Kutch Copper Limited, either directly or indirectly. This includes, but is not limited to, vendors, subcontractors, distributors, and service providers.

LABOUR & HUMAN RIGHTS

Kutch Copper Limited is committed to upholding human rights and expects Suppliers to do the same. Suppliers must ensure fair working conditions, respect for local laws, and adherence to the principles of dignity and equality in the workplace. Specifically, Suppliers are expected to:

- Prohibit child labour by ensuring all workers meet the legal age requirements.
- Avoid forced, bonded, or involuntary labour.
- Foster an environment free from discrimination in recruitment and employment.
- Respect worker's rights to freedom of association and collective bargaining.
- Comply with regulations on working hours, wages, benefits, and leave.
- Ensure their operations, supply chains, and business relationships are free from slavery and human trafficking.
- Protect the privacy of employees and customers, adhering to laws regarding personal data collection and use.
- Provide equal opportunities and maintain a harassment-free workplace.
- Refrain from charging employees recruitment fees or withholding identity documents.

Suppliers are responsible for maintaining these standards across their operations and within their supply chains.

HEALTH, SAFETY, AND ENVIRONMENTAL STEWARDSHIP

Kutch Copper Limited (KCL) is committed to ensuring a safe, healthy, and environmentally responsible workplace. We expect our Suppliers to adhere to these principles by adopting business practices that ensure:

- A safe and healthy work environment for employees and subcontractors, including the provision of appropriate personal protective equipment.
- Taking reasonable steps to prevent workplace injuries and illnesses.
- If worker accommodations are provided, it must be ensured that they are safe, hygienic, and uphold the privacy and dignity of the workers.
- Compliance with all applicable laws regarding environmental sustainability, health, and safety.
- Adoption of sustainable practices within their supply chain and operations, including reducing, reusing, and recycling resources.
- Prioritization of environmental protection, safeguarding ecosystems, and ensuring that products are free from conflict minerals.
- Monitoring and managing environmental impact, and reporting data in compliance with regulations.

Suppliers are expected to integrate these principles into their operations and actively contribute to the well-being of workers and the environment.

GOVERNANCE & LEGAL COMPLIANCE

The Supplier shall not engage, directly or indirectly, in any unethical conduct, including but not limited to offering or accepting personal or improper benefits to secure business or other advantages. Specifically:

- The Supplier shall not offer or accept bribes or any form of improper payment to gain an undue advantage. All activities must comply with applicable anti-bribery laws and regulations.
- The Supplier shall not exploit personal, familial, social, or political connections to obtain favourable treatment or business advantages. Any engagement with KCL must be based solely on merit.
- The Supplier shall avoid any financial or personal relationships with KCL employees that may create an actual or potential conflict of interest. Any such situations must be promptly reported to KCL.
- The Supplier shall not recruit or engage any KCL employee without obtaining prior consent from KCL.
- The Supplier shall refrain from engaging in any unfair or anti-competitive trade practices.
- The Supplier is prohibited from providing gifts, hospitality, or entertainment with the intent to influence business decisions or secure preferential treatment.
- The Supplier must conduct thorough due diligence on its procurement processes and ensure that all purchasing activities align with the Organization for Economic Cooperation & Development (OECD) guidance for responsible supply chain of minerals from Conflict Affected & High Risk Areas (CAHRA) Guidance.

FAIR COMPETITION AND INSIDER TRADING COMPLIANCE

Suppliers are expected to maintain fair and transparent business practices, ensuring transparency in all dealings with KCL. Anti-competitive behaviour that restricts fair competition is prohibited.

THIRD PARTY REPRESENTATION

The Suppliers shall not be authorized to represent KCL or to use KCL's brands without the written permission of KCL. Third parties and their employees who are authorized to represent KCL are expected to abide by this KCL's Supplier Code of Conduct in their interaction with, and on behalf of KCL including the confidentiality of information shared

DRUG & ALCOHOL FREE ENVIRONMENT

Suppliers must arrive at work free from any substances that could impair their performance or create an unsafe work environment. The use, possession, purchase, or sale of illegal drugs or alcohol is prohibited on KCL-controlled property. Employees (Supplier's) who are using prescribed medication that could affect their ability to perform their duties safely should inform their Supplier manager and/or designated safety personnel.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

We implement measures to safeguard our confidential information and intellectual property. Suppliers who have access to confidential KCL information must protect it with the same care as their own and in accordance with any relevant confidentiality agreements. Suppliers must not disclose confidential KCL information to third parties, including KCL's competitors, without explicit written consent from the Company (KCL).

The Supplier shall take appropriate steps to safeguard and not infringe any KCL confidential and proprietary information/intellectual property/ technology which come to its knowledge during the course of its business relationship/ dealings with KCL. In case of sub-contracting, sharing of confidential information should be made with the consent of KCL.

SUPPLIER COMPLIANCE AND COMMUNITY COMMITMENTS

At Kutch Copper Limited (KCL), we are committed to fostering positive relationships with local communities by supporting infrastructure, health, safety, education initiatives, and creating local employment opportunities. We respect local cultures, including those of indigenous peoples, and engage transparently with stakeholders to maintain our social license to operate. We expect our Suppliers to align with these values by respecting neighbouring communities, honouring local cultures, and hiring and sourcing locally whenever possible to contribute to local economic development.

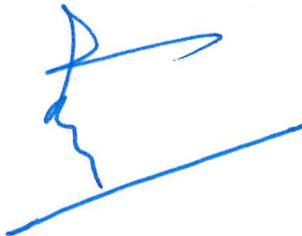
GRIEVANCE REPORTING:

KCL encourages all employees, suppliers, and stakeholders to report grievances related to unfair trade practices promptly and confidentially through designated channels, including a dedicated whistle blower channel email address (whistleblower@adani.com). KCL is committed to investigating all reported concerns impartially and without retaliation, ensuring the protection of the complainant's identity. Upon receipt of a grievance, KCL will undertake a thorough investigation and aim to resolve the issue in a timely manner, with appropriate corrective actions implemented as necessary.

In accepting this Code of Conduct, Suppliers commit to ensuring its compliance across their supply chains. Suppliers must adopt sustainable procurement practices and ensure that their agents, contractors, and suppliers are aware of and adhere to the principles outlined in this Code. KCL's Supply chain & Vendor risk assessment governs vendor onboarding, and Suppliers may be required to certify their compliance with the Code. KCL reserves the right to conduct due diligence and request documentation to verify compliance. Suppliers are also obligated to report any known or suspected improper behaviour related to their dealings with KCL or any misconduct by KCL employees.

ACCOUNTABILITY & REVIEW

The oversight for this code shall be provided by the Commercial Management Committee. KCL – Head Sourcing will be accountable for implementation of this code. This code will be reviewed annually.



Dr. Vinay Prakash
Managing Director
Date: 01-July-2024

REFERENCES

- The Copper Mark
- Convention on the Rights of the Child
- International Council on Mining & Metal (ICMM) 10 principles
- ILO core labour conventions
- OECD Guidelines for Multinational Enterprises
- UN Declaration on the Rights of Indigenous People
- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Voluntary Principles on Security and Human Rights
- EU CAHRA
- LME

Asking Questions

If you have any questions about the Code:

- Review Company policies (Responsible Sourcing/Grievance Mechanism) available on www.adanimetals.com
- Email the Grievance/Complaint by filling up the KCL Stakeholder Complaint form to Grievance committee Head at seetharaman.narasuraman@adani.com