	<p><u>CONTROLLED DOCUMENT</u></p> <p>Procurement policy</p> <p>Supplier Code of Conduct</p>	<p>Policy Number: Proc-63 Policy Owner: Central Procurement team Authorized by : HOC – Procurement Access Level : 0 - 5</p>
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Policy Statement and Purpose

Macrotech Developers Limited ('we', 'our', 'Company') are committed to good corporate governance and upholding the best interests of all our stakeholders. Suppliers are an integral part of our business value chain and contribute to our growth and success. This Supplier Code of Conduct ("**Code**") sets out transparent and ethical business practices which the Company expects its suppliers, vendors, contractors, their employees, subsidiaries, affiliates and sub-contractors ("Suppliers") to adhere to in any business dealings with the Company.

A. Business Integrity and Ethics


- Suppliers shall provide goods and services of high quality that meet with all applicable standards
- Suppliers shall give an undertaking to abide by our Transparency & Ethics Policy and the Anti Money Laundering, Anti Bribery and Anti Corruption Policy at the time of empanelment / on boarding.
- Suppliers shall comply with all applicable laws and regulations of the country / region where they operate.
- Suppliers shall act fairly and ethically in sourcing from their supply chain and in their business relationships with their customers and employees
- Suppliers shall not engage into a financial or any other relationship with any of our employees which may create an actual or a potential conflict of interest. Conflicts must be disclosed and approved in advance prior to commencing a transaction
- Suppliers shall compete for business orders on merits in prices and quality of their products/services without undue influencing the stakeholders/ decision makers
- Suppliers shall be annually reiterated that any direct or indirect approaches of bribery and corruption is prohibited and is liable for penal action.
- Suppliers shall neither give, offer or make, or receive, directly or indirectly, any illegal payments or gifts either in cash or in kind to or from us or our employees, for obtaining undue benefits or favours for the conduct of business with us

B. Labour Standards and Practices

- Suppliers shall implement fair, humane and non-discriminatory employment practices and shall have in place communication mechanisms and grievance handling procedures that enable their employees to raise concerns and complaints directly with their management.
- Suppliers shall comply with all applicable laws and regulations pertaining to human rights, working hours, statutory minimum wages, working conditions, occupational health and safety, and industrial relations.
- Suppliers shall not indulge in or tolerate from their partners any engagement in any form of Modern Day Slavery. The suppliers and their supply chain must not employ anyone below the legal employment age, or any forced or illegal migrant labour, compulsory labour without legal minimum wage, human trafficking and other forms of modern day slavery; including through subcontracting arrangements.

C. Confidentiality & Intellectual Property Rights

- Suppliers shall comply with all applicable data protection and privacy laws and regulations. Contractors/suppliers shall treat all information provided by the Company in confidence, and shall not disclose such information to unauthorised third parties or the public.
- Suppliers shall recognise and respect the Company's intellectual property rights in its trademarks, copyright, design and patents.

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D. Health, Safety & Environment

1. Suppliers shall comply with applicable occupational safety and health legislations and pertinent requirements to provide a safe and healthy working environment.
2. Suppliers shall comply with all applicable environmental codes regulations and ensure to obtain and maintain all necessary environmental permits and registrations to conduct their business.
3. Suppliers shall take all appropriate and reasonable measures to sustain and protect the environment through proper waste management and air/noise pollution control.

E. Periodic Audits

The Company reserves the right to conduct (scheduled and unscheduled) audit for assessing Suppliers' compliance with this Code from time to time as appropriate.

F. Reporting violations

Suppliers may notify the Company regarding any known or suspected improper behaviour by any party during the course of its business dealings with the Company by email to **lodhaombudsman@gmail.com**.

References:

1. Transparency & Ethics Policy
2. Anti Money laundering, Anti Bribery, Anti Corruption Policy
3. General Conditions of Contract
4. Supplier General terms & conditions