

# Supplier Code of Conduct

Hindustan Zinc Limited

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## **CEO Address**

At Hindustan Zinc, responsible sourcing is at the core of our supply chain. We are committed to conducting business with integrity, sustainability, and respect for human rights. Our suppliers play a crucial role in upholding these values by ensuring ethical practices, environmental stewardship, and social responsibility in their operations. This Supplier Code of Conduct outlines our expectations and reinforces our shared commitment to building a transparent, resilient, and sustainable supply chain. Together, we can drive positive impact and create lasting value for our businesses, communities, and the environment.

## **Introduction**

This Supplier Code of Conduct is applicable to all 'Suppliers' globally. 'Supplier' here refers to suppliers/ service provider/ traders / agents/ consultants/ contractors/ joint venture partners/ third parties including their employees, agents and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to Vedanta Resources Plc or any of its subsidiaries including Hindustan Zinc Limited (HZL), affiliates, divisions ("Vedanta").

## **Purpose**

This Code sets forth the basic requirements that we ask our Suppliers to respect and adhere to when conducting business with HZL and its subsidiary companies. This Code embodies HZL's and its subsidiary companies commitment to internationally recognized standards, including the Core Conventions of the International Labour Organization, United Nations' Universal Declaration of Human Rights as well as prevalent industry standards, and all other relevant and applicable statutory requirements concerning Environment Protection, Minimum Wages, Child Labour, Anti-Bribery, Anti-Corruption, Health and Safety, Sustainability, whichever requirements impose the highest standards of conduct.

## **Section 1 - Labour & Human Rights**

Suppliers are mandated to adhere to all Labour Laws and Human Rights Laws in their operations and supply chain, Suppliers shall:

- Comply with all applicable local, state and national laws and international standards regarding human rights, including the International Bill of Human Rights and the International Labor Organization's Declaration of Fundamental Principles and Rights at Work
- Comply with the Company's Human Rights Policy, Social [Performance](#) Policy and Supplier and Contractor Sustainability Management Policy
- Respect the right to freedom of association of their workers and collective bargaining

- Ensure that all their employees are hired on their own free will and guarantee that all their operations are free from forced, bonded, compulsory, indentured, and/or prison labour or any other form of compulsory labour and child labour.
- Ensure that all its employees are provided equal employment opportunities, an environment conducive to their growth, free from any form of violence, discrimination and harassment.
- Ensure compliance with working hours, minimum wages, benefits, overtime, leaves, and other requirements as prescribed by applicable laws and regulations.
- Comply with all national and international (where applicable) anti-slavery and human trafficking laws.. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices both internally and within their supply chains and other external business relationships.
- Ensure that employees are not charged any fees or costs for recruitment, directly or indirectly.
- Not confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation of any of its workers/ employees.
- Suppliers are encouraged to contribute to the development of local communities where they operate by creating employment opportunities, sourcing locally, and supporting capacity-building initiatives.

## **Section 2 - Health, Safety & Environmental Sustainability**

Suppliers are obligated to adhere to applicable health, safety, and environmental standards within their organisation and supply chain. The supplier shall: -

- Provide its employees with a safe and healthy working environment and comply with all applicable laws and regulations regarding working conditions.
- Ensure that their workplaces prioritize the psychological and psychosocial wellbeing of their employees, fostering a safe, supportive, and respectful environment that promotes mental health and safety.
- Conduct business activities in compliance to Vedanta's Health, Safety, Environment and Sustainability standards as part of Vedanta Sustainability Framework (VSF).
- Seek to avoid, minimize, mitigate, and/or remediate negative impacts on the environment and proactively manage risks.
- Conduct activities in an environmentally responsible manner, including parameters like GHG emissions, energy efficiency, pollution prevention, water management & waste management, biodiversity, resource efficiency.

- Measure, manage, and report environmental and related data in accordance with applicable laws and regulations and enable our BRSR reporting obligations.
- Follow all Environmental, Health and Safety and other operational policies of the Company while executing any work or contract at the company site.
- Follow all laws of the land including laws on Environment sustainability and protection while executing any work for the Company.
- Adopt sustainable practices in its supply chain and own operations.

At Hindustan Zinc, we evaluate our suppliers based on Environmental, Social, and Governance (ESG) criteria.. Suppliers are expected to provide timely and accurate responses to the questionnaire and any additional information requests to ensure compliance with our ESG standards.

### **Section 3 - Ethics**

**Anti-Bribery:** The Supplier shall not, directly or through intermediaries, take any recourse to any unethical behaviour (implicit or explicit), or offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private, including with any employee of HZL and its subsidiary companies. More specifically, suppliers:

- Shall not offer or accept bribe or use other means of obtaining undue or improper advantage, offer or accept any kickbacks, and shall not take any actions to violate or cause its business partners to violate any applicable anti-bribery laws and regulations including the Foreign Corrupt Practices Act of USA (FCPA), Bribery Act of United Kingdom and Prevention of Corruption Act of India.
- Shall not take any advantage of any family/ social/ political connections to obtain favourable treatment or for the advancement of business or obtaining any favours. Merit shall be the sole attribute of association with HZL and its subsidiary companies.
- Shall not enter a financial or any other relationship with a HZL and its subsidiary companies employee that creates any actual or potential conflict of interest for HZL and its subsidiary companies. The Supplier is expected to report to HZL and its subsidiary companies any situation where an employee or professional under contract with HZL may have an interest of any kind in the Supplier's business or any kind of economic ties with the Supplier.
- Shall not offer any gift, hospitality, or entertainment for the purpose of obtaining any advantage, order or undue favour.
- Shall not recruit any employee of the company without the consent of the company.

**Unfair Trade Practices:** Suppliers shall desist from any unfair or anti-competitive trade practices.

**Ethical Compliance and Risk Based Procurement:** Suppliers must ensure that their procurement processes identify any ethical issues and regulatory non-compliance, through use of beneficial ownership data including the identification of red flags and risk assessment outcomes within their supply chain.

**Unauthorized Subcontracting:** Supplier must ensure that they must not subcontract any part of their work or obligations under their agreement with HZL without prior written consent of HZL

**Adherence to International Trade Laws:** Suppliers must fully comply with all relevant international trade laws, custom regulations, and security protocols designed to strengthen the security of global supply chain

**Reporting of Unethical Practices and Grievance Redressal Mechanism:** The Supplier shall ensure that an effective grievance procedure has been established to ensure that any worker/employee, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

Suppliers shall also forthwith report any unethical activity or discrimination involving any HZL and its subsidiary companies' employee or other Suppliers as per HZL and its subsidiary companies whistleblower policy (uploaded on the company website <http://www.hzlindia.com/common/images/HZL-WHISTLE-BLOWER-POLICY-19.10.2015.pdf>).

In case of any Grievance, Suppliers can raise the grievance as per "Policy on Business Partners Grievance Redressal" through ROBOS Platform "<https://sscapp.hzlmetals.com/RoboS/web>"

Detailed Policy is uploaded on the company website <https://www.hzlindia.com/wp-content/uploads/Policy-Vendor-Grievance-Redressal-16.01.23.pdf>

If you witness any violation, please reach out to below contacts:

INDIA – 18001030269

OUTSIDE INDIA - +911244900485

Email – [Vedanta.whistleblower@vedanta.co.in](mailto:Vedanta.whistleblower@vedanta.co.in)

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

**Third Party Representation:** - The suppliers shall not be authorized to represent HZL and its subsidiaries, nor use their brands, without prior written approval. Authorized third parties and their employees must adhere to HZL's Code of Conduct & Business Ethics Policy in all interactions on behalf of the company. They are also required to maintain the confidentiality of any shared information and sign a non-disclosure agreement to ensure its confidentiality.

**Prohibition on Insider Trading:** If the Supplier becomes aware of material, non-public information relating to HZL and its subsidiary companies or its business, it may not buy or sell HZL securities or engage in any other action to take advantage of that information, including passing that information on to others. In addition, if the Supplier becomes aware of material, non-public information about any other company, including HZL and its subsidiary companies' customers, suppliers, vendors or other business partners, that is obtained by virtue of the supplier's interaction with HZL and its subsidiary companies, then the Supplier shall not buy or sell that company's securities or engage in any other action to take advantage of that information, including passing that information on to others.

#### **Section 4 – Other**

**Product And Service Standard:** Suppliers are expected to deliver products and services of the highest quality, ensuring compliance with all applicable industry standards, regulation, and contractual requirements.

Products must meet the agreed upon specifications. Suppliers should implement quality control measures and continuous improvement process to maintain and enhance product excellence

**Effective Risk management & Due diligence:** HZL collaborates with suppliers who provide the information that is timely, precise, and pertinent, and they take appropriate measures to understand their own suppliers based on risk assessments.

We conduct due diligence on our suppliers to ensure a risk-based procurement approach, evaluating potential risks related to business integrity, human rights compliance, data privacy, cybersecurity risk, sustainability risk, ethical business practices and beneficial ownership information. Suppliers are expected to cooperate in these assessments and provide the complete and accurate information.

Following due diligence assessments adhere to agreed mitigation measures. Adherence to these measures is essential for maintaining business relationships and ensuring responsible sourcing for HZL.

Suppliers are required to implement risk management programs to effectively address data privacy and cybersecurity risks within their organizations. Upon request, they must provide documented evidence of these risk management programs to demonstrate their efforts in managing such risks.

## **Supplier's Compliance Commitment**

Suppliers must ensure that this Code is adopted and cascaded into their supply chain. Suppliers must ensure that their agents, contractors, and suppliers are also made aware of this Code, its implications and adopt the same.

HZL and its subsidiary companies expects the Supplier to adhere to all applicable laws and regulations and, in particular, comply with this Code in letter and spirit. It is the Supplier's responsibility to read and understand the contents of this Code and HZL's Code of Conduct & Business Ethics Policy. As a condition of doing business with HZL and its subsidiary companies the Supplier must comply with this Code and agree to uphold such values during its business association with HZL.

By accepting this code of conduct, it is implied that the suppliers will ensure compliance of this 'Code' with their suppliers.

The Supplier shall maintain adequate documentation to demonstrate compliance with the principles of this Code and allow access to HZL and its subsidiary companies to check compliance upon request with reasonable notice.

The Supplier shall notify HZL and its subsidiary companies regarding any known or suspected improper behaviour by the Supplier relating to its dealings with HZL, and its subsidiary companies or any known or suspected improper behaviour by HZL and its subsidiary companies' employees.

[Hindustan Zinc's Supply Chain Management Strategy, Sustainable Sourcing Policy , Supplier and Business Partner Sustainability Management Policy, ESG expectations should also be read in conjunction with overall Supplier Code of Conduct.](#)

## **Accountability & Review**

Group Head – Commercial and the HZL Chief Commercial Officers will be accountable for implementation of this code. The code will be reviewed annually.

Please contact the concerned Head commercial/ Company Secretary if you have any questions about this Code.

March 28, 2025  
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