



SARDA ENERGY & MINERALS LIMITED

Regd. Off: 73-A, Central Avenue, Nagpur (MH.) 440018
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URL: www.seml.co.in CIN: L27100MH1973PLC016617

Supplier Code of Conduct

1. Objective

SEML ("the Company") considers its suppliers, contractors, and service providers as critical partners in its value chain. The Company expects all suppliers to conduct their business responsibly, ethically, and in compliance with applicable laws, while respecting human rights, protecting the environment, and maintaining high standards of integrity.

This Supplier Code of Conduct ("SCC") sets out the minimum standards and expectations that suppliers must adhere to while doing business with SEML.

2 Effective Date

This Policy comes into effect from 23.05.2026.

3 Scope of Policy

This Code applies to all suppliers of SEML, including but not limited to:

- i) Vendors, contractors, and consultants;
- ii) Service providers, agents, and intermediaries; and
- iii) Sub-contractors engaged in relation to SEML's business.

Suppliers are expected to communicate this Code to their employees and, where feasible, to their own suppliers and sub-contractors involved in SEML-related activities.

4 Compliance with Laws & Regulations

Suppliers shall:

- i) Comply with all applicable local, national, and international laws and regulations;
- ii) Obtain and maintain all required licenses, permits, and approvals; and
- iii) Conduct business in a manner consistent with legal and regulatory requirements in the jurisdictions in which they operate.

5 Implementation

SEML suppliers are required to acknowledge and implement this code of conduct. If there are any gaps in implementation, suppliers are expected to plan and implement a time-bound improvement plan. In the incidence of severe violation of this code, the company reserves the right to take actions including termination of the contract.

6 Grievance Redressal

Suppliers are encouraged to:

- i) Establish grievance mechanisms for their employees; and
- ii) Report any actual or suspected violations of this Code, laws, or ethical standards related to SEML's business

Reports may be made in good faith through channels communicated by SEML. Confidentiality shall be maintained to the extent possible, and retaliation against whistle-blowers is prohibited.



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7 Supplier Code of Conduct

- i) Business Ethics
 - a) Suppliers shall not engage in bribery, corruption, extortion, or any improper business practices
 - b) No improper payments, gifts, or inducements shall be offered or accepted in connection with SEML's business
 - c) Any actual or potential conflict of interest involving SEML employees or representatives must be disclosed promptly
 - d) Suppliers shall comply with applicable competition and anti-trust laws and refrain from anti-competitive practices
- ii) Health and Safety
 - Supplier shall -
 - a) Provide a safe, healthy, and hygienic working environment;
 - b) Identify, assess, and mitigate workplace health and safety risks;
 - c) Provide appropriate training and protective equipment to its employees; and
 - d) Enable workers to report unsafe conditions without fear of retaliation.
- iii) Environmental Responsibility
 - Suppliers are encouraged to minimise the environmental impact of their operations by:
 - a) Complying with all applicable environmental laws and regulations;
 - b) Efficiently using energy, water, and natural resources;
 - c) Managing waste responsibly, including hazardous waste;
 - d) Preventing pollution and reducing emissions; and
 - e) Where feasible, adopting environmentally responsible and circular economy practices.
- iv) Human Rights and Labour Practices
 - Suppliers shall respect internationally recognised human rights and comply with applicable labour laws:
 - a) Prohibit child labour, forced labour, bonded labour, or human trafficking;
 - b) Ensure employment is freely chosen;
 - c) Respect freedom of association and the right to collective bargaining, as permitted by law; and
 - d) Provide fair wages, benefits, and working hours in compliance with applicable laws.
 - e) Promote equal opportunity and prohibit discrimination or harassment based on gender, caste, religion, disability, nationality, or any other protected characteristic;
 - f) Maintain a workplace free from abuse, harassment, or intimidation
 - Quality, Confidentiality and Data Protection
 - Suppliers shall:
 - a) Deliver products and services that meet agreed quality, safety, and performance standards;
 - b) Protect SEML's confidential information, intellectual property, and business data;

SEML: Supplier Code of Conduct



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- c) Comply with applicable data protection and privacy laws; and
 - d) Use SEML's name, brand, or intellectual property only with prior written authorization
- vi) Sub-Contracting
- a) Suppliers shall not engage sub-contractors for SEML-related work without ensuring that such sub-contractors comply with the principles set out in this Code.
 - b) Suppliers remain responsible for the conduct and compliance of their sub-contractors.
- 8 Monitoring, Corrective Action, and Enforcement**
- SEML may assess supplier compliance with this Code through appropriate means, including self-declarations, reviews, or audits, based on risk and materiality, and -
- i) Where gaps are identified, suppliers may be required to implement corrective actions within reasonable timelines.
 - ii) Material or repeated non-compliance may result in review, suspension, or termination of the business relationship, in accordance with contractual terms.
- 9 Review and Amendment**
- This policy shall be reviewed and amended by the Board of Directors of SEML, as and when felt desirable / necessary to meet the applicable requirements, changes in laws, business practices, or sustainability expectations.