- Supplier Code of Conduct and Integration into Supplier Contracts: The supplier code of conduct has elements of ILO, Indian Factories Act and other elements of global supply chain standards. During supplier assessment both environmental and social compliances form part of the audit process. However, we are working on strengthening this further and will be disclosing an updated version soon, which will highlight the alignment with national and global guidelines and standards explicitly. Further, the same is also part of the respective supplier contracts.
- 2. Management and Accountability: The sustainability committee, mission team and unit teams are responsible for all ESG related aspects including formalizing policies, deployment, implementation, monitoring and reporting. The focus areas include supply chain and it is being closely monitored along with the procurement team. The code of conduct does include aspects of child labour and forced labour, and therefore is monitored on a periodic basis internally.
- 3. Stakeholder Engagement: Labour management (inclusive of child labour, forced labour, human rights, grievance redressal among others) are part of our internal code of conduct, and supplier assessments. Further our own manufacturing units are WRAP certified and therefore a formal assessment of labour management issues are being carried out. All our manufacturing sites are compliant in all the 12 principles of WRAP and have been accredited by WRAP as either Gold or Platinum certification valid for a year or two years respectively. Having said this, we will work on enhancing the disclosure on stakeholder mapping pertinent to labour management.
- 4. Traceability and supply chain transparency: We do have 100% mapping and transparency of all our Tier 1 and 2 suppliers. Our procurement team maintains all documentation including name, address, contact person, type of raw material supplied in our SAP Purchase Info Record T Code ME13 & this can be accessed by all Authorized Persons in the organization. We have suppliers from across the world, but majority of them are from India (local supply chain).
- 5. Risk assessment: Currently, Currently, we are in the process of assessing 25% of our critical suppliers based on environmental and social parameters for which communication has already been sent out to respective vendors & we hope to complete this before end of March '21. In continuation, we are looking at assessing 100% of our suppliers in the coming years. Supplier assessment is a key focus area for us and therefore we are working on this area and will strive to complete 100% of suppliers by FY 2025 or sooner.
- 6. Purchasing practices: Sustainable sourcing is a priority for us & while on boarding Vendors, we do take a close look at their infrastructure & facilities from both environmental as well as Social viewpoint. We also regularly engage with both Vendors as well as their Chemical Suppliers to ensure that we follow the most environment friendly recipe & a process which is least demanding in terms of usage of chemicals water, power & other utilities. For the record, 90% of our critical suppliers are OEKO-TEX certified & all of them employ State of the Art technology which also in turn helps in reduction of natural resources. Further, we are also looking at using recycled materials in our products & concentrated efforts are on to become a part of circular economy. We are currently at the concept stage for such initiatives and will therefore also frame the disclosures accordingly.
- 7. Recruitment Fees: We do not charge recruitment fees of any form. Our recruitment practices are transparent and follow the requirements of the Indian Factories Act. For skilled and un-

skilled labour, the Human Resources department is in-charge and accountable for recruitment, onboarding, inducting as well as training of the new joinee. During recruitment we screen for age and address proof (basis academic mark cards, ration cards, Aadhar card). Monthly salaries are paid through bank accounts only and over-time, benefits are clearly explained and provided in the form of a contract to the new joinee. Even for contract labour, there is no recruitment fee charged.

- 8. Freedom of association: Page Industries promotes Collective Bargaining and freedom of association across its operations. This has also been highlighted in our policy. However, currently there are no operational labour unions in any of our facilities.
- 9. Grievance mechanism: At Page, we value integrity and accountability and these form the basis for all our actions and decisions. Our values are embodied in the code of conduct, this is applicable across employees of all categories. Any instances of violation of this code in letter and spirit are to be reported to the management or any other member of the board. All allegations or improper or illegal behaviours are investigated promptly and thoroughly. To this effect we also have the Grievance Redressal Policy. We have a designated welfare officer, who is in charge of managing grievances. We have made provisions for both a suggestion box and a complaint box for workers to anonymously report any grievance. These issues are discussed at the factory manager and HR level and are brought to the notice of the corporate HR team. Below is the process flow and accountability framework for grievance redressal.



10. Remedy programs and response to allegation: While the grievance mechanism and redressal systems are in place and being monitored diligently within the own manufacturing unit of Page, we intend to extend the same to our suppliers as well. We are exploring means along

the lines of displaying our Code of Conduct at supplier locations and also making provisions for capturing grievances at their end. This is currently in the discussion stage and we will look at implementation shortly.