

## SUPPLIER CODE OF CONDUCT

### Purpose and Scope

Gujarat Mineral Development Corporation Limited (hereinafter referred to as 'GMDC' or 'the Company') is dedicated to conducting its operations and Services in an ethical, lawful, and socially responsible manner. This Supplier Code of Conduct ('the Code') outlines GMDC's expectations of how its Suppliers conduct business.

GMDC expects all suppliers to operate in alignment with the principles laid out in this Code and, at a minimum, to fully comply with all applicable laws, regulations, and statutory requirements in the jurisdictions where they operate. Suppliers are also expected to cooperate openly with regulatory authorities responsible for enforcing such laws.

### Applicability

This code applies to all entities and individuals engaged in providing goods and services to GMDC, including its joint ventures and associate entities. This includes, but not limited to suppliers, vendors, traders, agents, consultants, contractors, third parties, as well as their employees, agents and representatives. By entering into business relationship with GMDC, all such parties are deemed to have acknowledged, accepted, and committed to adhere to the principles and standards set forth in this Code.

### Key Principles of the Code

#### **1. Compliance Management**

##### **Statutory Compliance:**

Suppliers must comply with all applicable laws, rules, and regulations in the jurisdictions where they operate. This includes, but is not limited to, labour laws, environmental regulations, health and safety standards, and corporate governance norms. Suppliers are required to maintain up-to-date records of all necessary licenses, permits, and approvals for the conduct of their business, and must provide copies to GMDC upon request.

##### **Statutory Notices:**

Suppliers shall promptly inform GMDC of any legal notices, penalties, or sanctions received in connection with non-compliance or violation of statutory obligations. Such disclosure must include relevant details and any corrective actions being undertaken.

##### **Quality Assurance:**

Suppliers must ensure that all goods and services delivered to GMDC conform to applicable industry standards, regulatory requirements, and the specific quality criteria defined in the contract. Suppliers are required to:

- Obtain prior written approval before procuring materials for GMDC, unless explicitly exempted.
- Adhere to GMDC's approved vendor/sub-supplier list where specified.
- Promptly notify GMDC of any quality deviations, non-conformances, or potential supply issues, and await GMDC's final decision before proceeding.

##### **Policies:**

Suppliers shall comply with all contract terms, purchase orders, and applicable policies, guidelines, and standard operating procedures issued by GMDC during the execution of work at GMDC owned, controlled or managed sites and offices, including those of its joint ventures and associate entities. This includes adherence to safety, environmental, ethical, and sustainability-related policies wherever applicable.

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GMDC/CS/2025-26/BRSR	11.2.2026	Managing Director

## 2. Labour and Human Rights

### **Human Rights:**

Suppliers shall uphold internationally and nationally recognized human rights laws and guidelines to operate in a lawful, ethical, and socially responsible manner. They must comply with all applicable Indian Labour Codes and provide evidence of such compliance to GMDC upon request.

### **Workplace Conduct:**

Suppliers shall ensure a workplace free from violence, harassment, abuse, and exploitation, fostering a culture of dignity, equality, and respect for all employees and workers. Suppliers must comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH), establish an Internal Committee where required, conduct awareness sessions, and take timely disciplinary action in case of misconduct.

### **Indigenous Culture and Local Communities:**

Suppliers shall operate responsibly to safeguard the rights and traditions of indigenous peoples, minorities, and local communities by engaging stakeholders, minimizing adverse impacts, and contributing to socio-economic development.

### **Prevention of Human Trafficking:**

Suppliers shall prevent any form of human trafficking, bonded labour, or exploitation in their operations and supply chains. All employment must be freely chosen, and workers must not be subjected to coercion, threats, deception, or recruitment through fraudulent means.

### **Freedom of Association and Collective Bargaining:**

Suppliers shall recognize and respect the rights of employees to freely associate and engage in collective bargaining, supporting fair and constructive labour relations.

### **Prohibition of Forced and Child Labour:**

Suppliers shall strictly prohibit all forms of forced, compulsory, and child labour. They must comply with legal age requirements and implement systems to prevent, detect, and address any violations.

### **Non-Discrimination and Fair Workplace Practices:**

Suppliers shall ensure equal opportunity, fair wages, reasonable working hours, and a workplace free from discrimination on any grounds, including gender, caste, religion, ethnicity, or disability.

### **Protection of Vulnerable Groups:**

Suppliers shall take proactive measures to protect vulnerable populations, including children, the elderly, persons with disabilities, and migrant workers, from harm or exploitation arising from business operations.

## 3. Environment

### **Environmental Protection:**

Suppliers shall comply with all applicable environmental laws and regulations. They are encouraged to adopt a precautionary approach to environmental protection and implement policies that support long-term sustainability.

### **Energy and Emission Management:**

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- Suppliers are expected to monitor their energy consumption, adopt energy-efficient technologies and practices, and progressively transition to renewable energy sources to reduce their carbon footprint.
- Suppliers should establish systems to monitor and control greenhouse gases emissions and other air pollutants, ensuring compliance with relevant air quality regulations and actively working to reduce overall emissions.

**Resource Efficiency:**

- Suppliers should optimize the use of raw materials and water through efficient product and process design, aiming to minimize waste and enhance overall resource efficiency.
- Suppliers must source water only from legally authorized sources and are encouraged to implement water conservation, recycling, and reuse initiatives as part of sustainable water management practices.

**Waste and Effluent:**

Suppliers shall monitor, treat, and dispose of waste and wastewater in accordance with applicable regulatory standards, promoting pollution prevention and responsible waste management practices.

**Responsible Production:**

Suppliers are expected to reduce or eliminate the use of environmentally harmful substances and promote the reuse and recycling of materials wherever feasible.

**Protect Ecosystems and Biodiversity:**

Suppliers are encouraged to take proactive measures to minimize ecological impacts, conserve biodiversity, prevent deforestation, and contribute to the restoration of natural habitats and forests in affected areas.

**4. Business Ethics**

**Prohibition of Corruption:**

Suppliers must maintain the highest ethical standards and strictly prohibit any form of bribery, fraud, or corrupt practice. They shall comply with all applicable anti-corruption and anti-bribery laws and regulations. Suppliers must not engage in, or facilitate, money laundering or the funding of terrorism. Integration of anti-corruption awareness and training programs within their operations is encouraged.

**Conflict of Interest:**

Suppliers shall promptly disclose any actual or potential conflict of interest that may, or may appear to, affect their business relationship with GMDC. This includes any personal, financial, or professional interests involving GMDC employees, their relatives, government officials, or any other parties that could compromise, or be perceived to compromise, the supplier’s objectivity, integrity, or ability to act in GMDC’s best interests.

**Gifts and Entertainment**

Suppliers shall not offer, provide, or promise any gifts, hospitality, entertainment, favours, or personal benefits, directly or indirectly, to GMDC employees, representatives, or any person associated with the Company. Any such offer may be construed as an attempt to influence business decisions and is strictly prohibited. Suppliers must immediately report any request or solicitation of gifts, hospitality, or personal benefits by GMDC personnel through the Company’s designated whistleblowing or vigilance mechanism.

**Unlawful Use of Insider Information:**

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GMDC/CS/2025-26/BRSR	11.2.2026	Managing Director



Suppliers and their personnel are strictly prohibited from using any material, non-public information obtained through their relationship with GMDC to trade or enable others to trade in the securities of any company. Misuse of such information is a violation of securities laws and is subject to legal consequences.

**Intellectual Property Rights:**

Suppliers must respect and safeguard all intellectual property rights belonging to GMDC and other involved parties. This includes ensuring proper handling of confidential information and protection against unauthorized disclosure or infringement of patents, copyrights, trademarks, or trade secrets.

**Post-employment Provisions:**

Suppliers are encouraged to maintain fairness in procurement and prevent conflicts of interest by avoiding the employment, contracting, or engagement of former GMDC personnel involved in procurement or commercial decisions, and promptly informing GMDC if such situations arise. Suppliers are expected to exercise due diligence in following this requirement and to avoid any engagement that could create, or appear to create, undue influence on GMDC’s procurement processes.

**Business Conduct:**

Suppliers must ensure timely delivery of quality goods and services at competitive prices. They shall use GMDC’s assets, systems, or information only for authorized purposes and are responsible for preventing misuse of any company resources entrusted to them.

**Ethical Competition:**

Suppliers shall conduct their business in compliance with applicable competition laws and shall not engage in anti-competitive practices, including price-fixing, bid-rigging, or market allocation. All actions must reflect principles of fair and ethical competition.

**Grievance Redressal Mechanism:**

Suppliers are required to establish accessible and effective grievance mechanisms for their employees and workers in alignment with regulatory requirements, allowing individuals to report concerns or grievances, individually or collectively, and ensure that such grievances are addressed promptly, fairly, and without retaliation.

**5. Health and Safety**

**Safe Working Environment:**

Suppliers shall provide a safe, clean, and healthy work environment that prevents accidents, injuries, and work-related illnesses. This includes appropriate lighting, ventilation, sanitation, and access to drinking water.

**Risk Prevention and Safety Measures:**

Suppliers shall proactively identify, assess, and mitigate potential occupational health and safety risks. Processes and operations should be designed to minimize exposure to hazards. This includes implementing safety protocols, using safe equipment and tools, and conducting regular risk assessments.

**Training and Competency:**

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Suppliers Shall ensure that all employees, workers, and contractors receive adequate health and safety training relevant to their job roles. This includes initial training during induction and periodic refresher sessions to maintain safety awareness and preparedness.

**Use of Personal Protective Equipment (PPE):**

Suppliers shall provide and enforce the use of appropriate personal protective equipment to all employees and workers, based on the nature of their work and associated risks.

**Compliance with Health and Safety Standards:**

All suppliers Shall align with recognized general principles of occupational health and safety management. These include:

- Identification and elimination of hazards
- Minimization of risks at the source
- Deployment of competent and trained personnel
- Regular maintenance of machinery and safety devices

**Worker Accommodation (if applicable):**

Where worker accommodation is provided, suppliers shall ensure that such facilities are safe, secure, clean, and meet applicable health and safety regulations and standards.

**6. Data Privacy**

Suppliers shall conduct their operations with a strong commitment to data privacy and information security. They must:

- Minimize exposure to physical and cyber security threats by implementing appropriate safeguards.
- Ensure that all security personnel deployed respect human rights and do not engage in coercive or abusive conduct.
- Adhere strictly to GMDC’s on-site security protocols and procedures.
- Protect GMDC’s physical infrastructure and information assets from unauthorized access, loss, or misuse.
- Promptly report any data breaches, cyber incidents, or other security violations to GMDC.
- Comply with all applicable laws and regulations related to information security, cyber-security, and personal data protection, and cooperate with GMDC to uphold compliance standards.

**7. Supplier Evaluation**

GMDC evaluates its suppliers based on their ability to meet the expectations and requirements outlined in this Supplier Code of Conduct. Assessments may consider factors such as legal compliance, ethical practices, health and safety standards, environmental performance, and social responsibility.

**8. Continuous Improvement**

GMDC encourages suppliers to continuously improve their systems, policies, and performance to meet or exceed the standards of this Code. Suppliers are expected to proactively adopt best practices and innovations in responsible business conduct.

**9. Acceptance**

By accepting a purchase order, contract, or agreement with GMDC, suppliers confirm that they:

- Have read and understood the Supplier Code of Conduct.

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- Accept and agree to comply with its principles.
- Will integrate the Code's requirements into their operations and ensure adherence by their employees, subcontractors, and representatives.

**10. Review of the Code**

This Code of Conduct will be reviewed as and when required by the GMDC's Management to ensure continued effectiveness and relevance. Updates may be made in response to evolving regulatory requirements, business practices, and stakeholder expectations.

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