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## SUPPLIER CODE OF CONDUCT

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| FRACTAL ANALYTICS LIMITED. |                                                        |
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| Prepared by                | Procurement with input from CSR.                       |
| Reviewed by:               | Procurement, Legal & CSR Team                          |
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## A. Purpose

Fractal Analytics Limited, its subsidiaries, and affiliates (“Fractal”) depend on many external parties to provide goods and services required to operate and function. Fractal is committed to encouraging and supporting suppliers who share a commitment to ethical and responsible business conduct and adherence to best practices for the management of labour, health and safety, and the environment.

The Supplier Code of Conduct outlines our expectations from suppliers and their employees, personnel, agents, contractors, and subcontractors.

## B. Scope and Applicability

A Supplier is defined as a goods supplier/service provider/ hardware supplier/software supplier/vendor/ trader/ agent/ consultant/ contractor/Manpower service provider / joint venture partner and their representatives who have a business or contractual relationship with and provide, sell, seek to sell, any kinds of goods or services to Fractal. The Fractal’s supplier code of conduct is applicable to the Supplier and their sub-contractors / partners providing products or services to Fractal.

As a principle, Fractal believes that all its suppliers are in full compliance with all the applicable laws, rules, and regulations of the countries in which they operate. This Supplier Code of Conduct encourages suppliers to go ‘beyond compliance’ while drawing upon Good International Industry Practices (GIIP), to advance social and environmental responsibility and business ethics. Where national law and international human rights standards differ, we shall follow the higher standard. Where they are in conflict, we shall respect the national law.

This supplier code of conduct is governed by the Fractal’s commitments to sustainable procurement and supply chain.

## C. Supplier Code of Conduct

### A. Labour

Suppliers shall be committed to upholding the human rights of workers and to treating them with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

#### i. Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons is not permitted.

#### ii. Child Labour and Young Workers

Child labour (below 14 years of age) shall not be used in any stage of the business operations. Young workers (below 18 years of age) shall not perform work that is hazardous and can potentially cause harm to health and safety. Any engagement of young workers for the purposes of their learning and growth must at all times be in compliance with applicable local laws and regulations.

**iii. Wages and Benefits**

Supplier shall communicate pay structure and pay periods to all the workers. Supplier shall pay at least the minimum wage and provide additional benefits as required by law. Supplier shall compensate workers for overtime hours at the rate in accordance with law or employment contract.

**iv. Working Conditions**

Suppliers shall provide workers with accessible and clean facilities for sanitation, drinking water, and dining. Worker dormitories provided by a supplier or a third party shall be clean, safe, and provide reasonable living space.

**v. Non-discrimination**

Supplier shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices. Suppliers shall provide a workplace free of harassment and abuse, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

**vi. Freedom of Association**

Suppliers shall freely allow workers' rights to associate with others, form and join (or refrain from joining) organisations (such as trade unions) of their choice, and bargain collectively without interference, discrimination, retaliation, or harassment.

**B. Health and Safety**

Suppliers shall ensure a safe and healthy work environment for workers and minimise the incidence of work-related injury and illness. Suppliers shall recognise that continuous engagement with workers, including education and training, is essential to improving health and safety in the workplace.

**i. Occupational Health and Safety**

Suppliers shall identify and assess potential health and safety hazards to workers and take actions to eliminate or minimise such hazards using a hierarchy of controls. Wherever hazards cannot be eliminated, workers shall be provided with appropriate and well-maintained personal protective equipment (PPE). Suppliers shall routinely instruct and educate workers in their preferred language about the risks associated with the potential hazards and available safeguards, such as using PPE and machine safeguarding. Suppliers shall take steps to remove vulnerable workers, such as nursing mothers and pregnant women, from working conditions with high hazards.

**ii. Emergency Preparedness**

Suppliers shall identify potential emergency situations and assess their impact on workers, neighbouring communities, as well as the environment. Accordingly, suppliers shall develop a system for emergency notifications, emergency reporting, and evacuation procedures, including training and drills to ensure adequate emergency preparedness.

## **C. Environment**

Suppliers shall recognise that environmental responsibility is integral to the sustainability of an organisation. Suppliers shall identify and minimise their impact on the environment and natural resources and act as stewards of the local environment.

### **i. Environmental Monitoring**

Suppliers shall routinely monitor the impact of their operations on the environment, including freshwater resources, air quality, climate, biodiversity, as well as ambient conditions such as noise and nuisance.

### **ii. Pollution Prevention**

Suppliers shall take steps to eliminate or minimise emissions or discharge of pollutants such as air pollution, wastewater, and solid waste. Hazardous materials, such as chemical waste, shall be identified, segregated, stored, and disposed of in a safe and responsible manner.

### **iii. Water Management**

Suppliers shall take steps to reduce water consumption, minimise freshwater demand, and manage all wastewater discharge in a responsible manner. Suppliers shall take initiatives for water conservation, such as tree plantation, rainwater harvesting, and water reuse.

### **iv. Energy Consumption and Decarbonization**

Suppliers shall take steps to reduce energy demand and reliance on fossil fuel-based energy sources in their operations and logistics. Suppliers shall take steps to minimise their GHG emissions and are requested to carry out and maintain a GHG inventory of their Scope 1, Scope 2 and Scope 3 emissions. Fractal may request this information from time to time. Suppliers are encouraged to get an independent third-party audit of their annual GHG emissions.

### **v. Resource Efficiency and Circularity**

Suppliers shall take steps to reduce consumption of virgin materials and encourage reuse and recycling of materials and packaging.

### **vi. Conflict-free and Ethical Sourcing of Raw Materials.**

Adhere to the principle of traceability to allow identification and tracking of raw material sources, manufacturing processes and value chain of the products supplied to Fractal.

## **D. Business Ethics and Management Practices**

### **i. Business Integrity**

Suppliers shall uphold the highest standard of integrity in their business interactions and shall have a zero-tolerance policy for all forms of bribery, corruption, extortion, and embezzlement. Suppliers shall not engage in giving and acceptance of gifts, including cash or cash equivalents such as gift cards and discounts, and avoid any causing any probable conflict of interest. In case of any such incidents, suppliers shall report as per the reporting mechanism. [Anti-Bribery Anti-Corruption Compliance Policy](#)

### **ii. Conflict of Interest**

Supplier shall take appropriate steps to ensure that neither the supplier nor any of its employees are placed in a position where, in the reasonable opinion of the Company, there is or may be an actual conflict, or a potential conflict, between the pecuniary or personal interests of the Vendor and the duties owed to the Company whether directly or indirectly. The Vendor shall notify the Company without delay, giving full particulars of any such conflict of interest which may arise.

**iii. Disclosure of Information**

Suppliers shall perform its business operations with adequate transparency and accuracy and routinely disclose financial and non-financial information to all stakeholders in accordance with applicable laws and prevailing industry practices.

**iv. Diversity and Inclusion**

Suppliers shall take steps to encourage diversity and inclusion of vulnerable and under-represented communities in its human resources. Suppliers are also encouraged to increase the incorporation of diverse and sustainable suppliers in their value chain. Diverse suppliers may include women-run and owned businesses, businesses owned by or operated by LGBTQIA+, veterans or other underrepresented groups.

**v. Education and Skill Development**

Suppliers shall conduct regular training and awareness sessions for workers and communities.

**vi. Grievance Management**

Supplier shall establish a system of recording, monitoring, and resolving grievances from internal and external stakeholders and protect whistle-blower confidentially to avoid any retaliation. [Whistleblower](#) policy

**vii. Community Development**

Suppliers shall take steps to contribute to the social, environmental, and economic development of the communities in which they operate.

**viii. Privacy**

Suppliers shall practice appropriate measures to respect privacy and to protect personal data against loss and unauthorised/unauthorised access or use, including confidential, proprietary, and personal information. Supplier shall respect intellectual property rights and safeguard customer information.

**ix. Sustainable and Responsible Procurement**

Suppliers shall uphold their supplier's socially and environmentally responsible behaviour. Suppliers shall develop a code of conduct for their supply chains and take steps to monitor and encourage good practices in their supply chain.

Suppliers shall practice responsible sourcing of minerals and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the

Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognised due diligence framework.

### **Management System**

Suppliers shall establish a management system for systemic implementation of this code. The management system shall be designed to ensure (a) compliance with applicable laws (b) assess the extent of conformance with this code, and (c) identification of actions for complete conformance with this code through continual improvement.

### **D. Additional Expectations Of Suppliers.**

- Conduct business with integrity and exhibit responsible behaviour in all interactions with Fractal. Fractal prohibits any unauthorised use of Fractal's logo and brand name.
- Maintain documentation necessary to demonstrate compliance with applicable laws as well as the Supplier Code of Conduct.
- Suppliers are required to sign the Annexure-I (Acknowledgement and Acceptance) of the Supplier Code of Conduct as a token of acceptance.
- Suppliers must report any potential violations of the Supplier Code of Conduct and allow the company to monitor their compliance.
- Suppliers must ensure that their own suppliers and subcontractors also adhere to the company's Supplier Code of Conduct.
- The Suppliers can register a complaint, give a suggestion, or send a query on any operational/ process issues related to the supplier code of conduct and procurement by writing to the procurement team through email.  
E-mail: [suppliercodeofconduct@fractal.ai](mailto:suppliercodeofconduct@fractal.ai)
- Suppliers are requested to participate in Fractal's Supplier Engagement Program (Training, Handholding, Awards and Recognition) as advised from time to time.

### **E. Communication**

This supplier code of conduct shall be communicated to all the suppliers as well as Fractal's internal and external stakeholders. The code will be displayed on Fractal's company website <https://fractal.ai/>.

### **F. Approval, Review and Revisions**

This supplier code of conduct shall be effective upon approval from Fractal's senior leadership

This Supplier Code of Conduct shall be reviewed on an annual basis and updated as required to ensure its relevance, effectiveness, and suitability to the relevant stakeholders.

Fractal is committed to obtaining input from all relevant stakeholders for the continued development of this Supplier Code of Conduct. Feedback received from stakeholders as well as any revisions in the code shall be duly recorded.

## Annexure I: Acknowledgement and Acceptance OF Supplier Code of Conduct

This is to confirm that \_\_\_\_\_ (*Insert Supplier Name*) hereby received, read, and understood requirements within the Supplier Code of Conduct and agree to abide by the same in all respects.

\_\_\_\_\_ (*Insert Supplier Name*) agrees to adhere to the requirements of the Supplier Code of Conduct and agrees to demonstrate to Fractal how these requirements are being met.

\_\_\_\_\_ (*Insert Supplier Name*) agrees to allow Fractal to examine and audit its facilities to verify compliance with the Supplier Code of Conduct.

Organisation Name:

Name of the authorised person:

Designation / Title of the authorised person:

Signature of the authorised person: