



KDDL Supply Chain Policy

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1. Preamble and Commitment

KDDL Limited ("the Company" or "KDDL") recognizes that a responsible, transparent, and resilient supply chain is critical to sustainable business growth and ethical governance. The Company is committed to managing its supply chain in a manner that upholds human rights, ethical labour practices, environmental responsibility, and legal compliance.

This Supply Chain Policy ("Policy") establishes the principles, standards, and governance framework governing KDDL's relationships with its suppliers, contractors, vendors, and business partners ("Suppliers"). The Policy integrates a **Supplier Human Rights Code of Conduct**, aligned with KDDL's **Human Rights Policy**, **Child Labour Policy**, **Forced Labour Policy**, and other governance policies.

2. Statutory and International Framework

This Policy is guided by and aligned with:

- Applicable Indian laws governing labour, employment, health and safety, environment, and contract management
- UN Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Core Conventions
- UN Universal Declaration of Human Rights (UDHR)
- ESG and responsible sourcing best practices.

3. Objective

The objectives of this Policy are to:

- Establish ethical, transparent, and responsible supply chain practices.
- Ensure respect for human rights across the Company's value chain.
- Prevent, mitigate, and address supply chain risks related to labour, ethics, safety, and compliance.
- Promote long-term, mutually beneficial relationships with responsible Suppliers.
- Integrate supply chain risk management into business decision-making.

4. Scope and Applicability

This Policy applies to:

- All procurement and sourcing activities of KDDL Limited and its subsidiaries.
- All Suppliers, including manufacturers, contractors, subcontractors, vendors, service providers, consultants, agents, and intermediaries in relation to RJC-scope materials.
- All stages of the supply chain, including sourcing, manufacturing, transportation, storage, and service delivery activities connected to RJC-scope materials.

5. Principles of Responsible Supply Chain Management

KDDL's supply chain management shall be guided by the following principles:

- Ethical business conduct and integrity.
- Compliance with applicable laws and contractual obligations.
- Respect for human rights and dignity.
- Health, safety, and well-being of workers.
- Environmental responsibility and sustainability.
- Transparency, accountability, and traceability.

6. Supplier Human Rights Code of Conduct

All Suppliers are expected to comply with the following minimum standards:

6.1 Prohibition of Child Labour

- Suppliers shall not employ or engage child labour in any form.
- Minimum age for employment shall comply with applicable laws.

6.2 Prohibition of Forced and Bonded Labour

- Forced, bonded, compulsory, prison, or trafficked labour is strictly prohibited.
- Workers shall be free to leave employment in accordance with law.
- No retention of identity documents, deposits, or wages is permitted.

6.3 Non-Discrimination and Equal Opportunity

- Suppliers shall provide equal opportunity and prohibit discrimination in hiring, compensation, promotion, or termination.

6.4 Wages, Working Hours and Benefits

- Wages shall be paid in compliance with applicable minimum wage, overtime, and social security laws.
- Working hours shall comply with statutory limits.

6.5 Health, Safety and Working Conditions

- Suppliers shall provide a safe, hygienic, and healthy working environment.
- Adequate safety systems, training, and protective equipment shall be maintained.

6.6 Freedom of Association

- Suppliers shall respect workers' rights to freedom of association and collective bargaining, provided it is in accordance with applicable laws.

6.7 Dignity and Respect

- Harassment, abuse, corporal punishment, intimidation, or inhumane treatment is prohibited.

6.8 Legal and Ethical Compliance

- Suppliers shall comply with all applicable labour, employment, environmental, health and safety, and anti-corruption laws.

7. Supplier Selection, Onboarding and Contractual Obligations

To ensure responsible, compliant, and sustainable sourcing, KDDL shall adopt a structured and risk-based approach to supplier selection, onboarding, and ongoing engagement.

7.1 Supplier Selection Criteria

Supplier selection shall be based on objective and transparent criteria, which may include:

- Compliance with applicable labour, employment, health & safety, environmental, and commercial laws.
- Alignment with KDDL's **Human Rights Policy, Child Labour Policy, Forced Labour Policy**, and this Supply Chain Policy.
- Demonstrated commitment to ethical business practices and integrity.
- Health, safety, and environmental management practices.
- Past compliance history, reputation, and risk profile.
- Capability to meet quality, delivery, and service requirements.

Suppliers operating in high-risk geographies or sectors may be subject to enhanced due diligence prior to onboarding.

7.2 Supplier Onboarding Process

As part of the onboarding process, Suppliers may be required to:

- Complete a **Supplier Self-Assessment Questionnaire (SAQ)** (refer Annexure I) covering human rights, labour practices, safety, and compliance. This is optional but good to assess the legal, ethical, human rights, labour, health & safety, and environmental standards of supplier.
- Submit relevant statutory registrations, licences, and compliance declarations.
- Acknowledge and formally accept KDDL's Supply Chain Policy and Supplier Human Rights Code of Conduct.
- Participate in onboarding discussions or training sessions, where required.

The extent of onboarding requirements shall be proportionate to the nature, scale, and risk associated with the Supplier's activities.

7.3 Contractual Obligations

All Supplier contracts, agreements, or purchase orders shall, where appropriate, include clauses requiring Suppliers to:

- Comply with this Supply Chain Policy and the Supplier Human Rights Code of Conduct.
- Comply with all applicable labour, employment, health & safety, environmental, and anti-corruption laws.
- Prohibit child labour, forced labour, bonded labour, and any form of human trafficking.
- Maintain accurate employment and wage records.
- Permit audits, inspections, or assessments by KDDL or its authorised representatives, upon reasonable notice.
- Promptly notify KDDL of any actual or suspected violation of applicable laws or this Policy.
- Flow down relevant obligations to their subcontractors or third-party service providers.

7.4 Consequences of Non-Compliance

Failure to comply with contractual obligations or this Policy may result in:

- Requirement to implement a **time-bound corrective action plan**, or
- Suspension of business or withholding of payments, where contractually permitted, or
- Termination of the business relationship in cases of serious or repeated violations, or
- Reporting to statutory authorities, where required under applicable law.

8. Supply Chain Risk Assessment and Due Diligence

- The Company shall conduct appropriate **risk-based supply chain due diligence**, focusing on high-risk geographies, activities, or suppliers.

9. Communication

- A copy of this Policy shall be made available on the company website.

10. Grievance Redressal and Reporting

- Suppliers and their workers may raise concerns relating to human rights or ethical violations through:
 - The Supplier's internal grievance mechanisms, or
 - KDDL's **Grievance Redressal Policy** or **Whistle Blower Policy**, as applicable.
- The Company shall ensure confidentiality, fair investigation, and protection against retaliation.

11. Review and Amendment

This Policy shall be reviewed **at least once every two (2) years** or earlier, if required, due to changes in laws, business operations, supply chain risks, or governance standards.

In the event of any inconsistency between this Policy and applicable law, the provisions of applicable law shall prevail.

The Company reserves the right to **interpret, implement, amend, suspend, or withdraw** this Policy or any part thereof, in accordance with applicable law and business

requirements. The interpretation of this Policy by the Company's Management shall be **final and binding**, subject to applicable statutory provisions.

1. **Policy Statement:** This Policy is issued by KDDL to ensure that the Company's supply chain operations are conducted in a responsible and sustainable manner. The Policy aims to promote ethical business practices, respect for human rights, and environmental responsibility throughout the supply chain.

2. **Scope:** This Policy applies to all aspects of KDDL's supply chain, including procurement, manufacturing, distribution, and disposal of products. It also applies to KDDL's business partners, suppliers, and contractors.

3. **Objectives:** The objectives of this Policy are to:

- Establish clear standards for ethical business practices, human rights, and environmental responsibility.
- Promote transparency and accountability in supply chain operations.
- Encourage continuous improvement in supply chain management.
- Contribute to the long-term sustainability and resilience of the supply chain.

4. **Principles:** The principles of this Policy are:

- Respect for Human Rights:** KDDL respects the human rights of all individuals involved in the supply chain, including workers, communities, and the environment.
- Environment:** KDDL is committed to minimizing its environmental impact and promoting sustainable practices.
- Transparency:** KDDL maintains transparency in its supply chain operations and communicates openly with stakeholders.
- Responsible Procurement:** KDDL sources materials and components from suppliers who meet ethical and environmental standards.
- Supply Chain Management:** KDDL implements effective supply chain management practices to ensure efficiency, quality, and compliance.

5. **Implementation:** KDDL will implement this Policy through:

- Establishing a supply chain management committee.
- Developing and maintaining internal procedures and controls.
- Training staff and partners on the requirements of the Policy.
- Monitoring and evaluating supply chain operations against the Policy's principles.
- Addressing any non-compliance and taking corrective actions.

6. **Review and Revision:** This Policy will be reviewed and revised annually or as required to reflect changes in the supply chain environment or business practices.

7. **Communication:** This Policy will be communicated to all KDDL employees, business partners, and suppliers.

8. **Signature:** The Managing Director, Mr. Yashovardhan Saboo, and the Executive Director, Mr. Sanjeev Masown, have authorized this Policy.

Authorized By:

Authorizer	Name	Date of Authorization
Managing Director	Mr. Yashovardhan Saboo	 18/11/25
Executive Director	Mr. Sanjeev Masown	 18/11/25

Annexure I

KDDL Supplier Self-Assessment Questionnaire (SAQ)

(Aligned with KDDL Supply Chain Policy, Human Rights Policy and Industry Standards)

Instructions

This Supplier Self-Assessment Questionnaire (“SAQ”) is issued by **KDDL Limited (“KDDL”)** to assess compliance with legal, ethical, human rights, labour, health & safety, and environmental standards.

All suppliers, contractors, vendors, and service providers (“Supplier”) are required to complete this SAQ accurately and honestly. Supporting documents may be requested by KDDL for verification purposes.

Section A – Supplier Profile

Particulars	Details
1. Legal Name of Supplier	
2. Registered Address	
3. Manufacturing/ Operating Locations	
4. Nature of Business / Goods / Services Supplied to KDDL	
5. Year of Establishment	
6. Ownership Type (Private / Partnership / Public / Others)	
7. Contact Person (Name, Designation, Email, Phone)	

Section B – Legal and Regulatory Compliance

Particulars	Details
1. Are you compliant with all applicable labour, employment, health & safety, environmental, and tax laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Have you received any notices, penalties, or adverse findings from labour or regulatory authorities in the last three (3) years?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details: _____
3. Do you maintain valid statutory registrations and licences (e.g., Factory Licence, Shops & Establishment, PF, ESI, GST)?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section C – Human Rights & Labour Practices

C.1 Child Labour

Particulars	Details
1. Do you strictly prohibit employment of child labour in compliance with applicable law?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Do you maintain age-verification records for all workers?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C.2 Forced / Bonded Labour

Particulars	Details
1. Are all workers employed voluntarily and free to leave employment in accordance with law?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Do you prohibit retention of identity documents, deposits, or wages as a condition of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C.3 Wages and Working Hours

Particulars	Details
1. Are wages paid in compliance with minimum wage, overtime, and social security laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are working hours and weekly rest days compliant with applicable laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C.4 Non-Discrimination & Dignity

Particulars	Details
1. Do you prohibit discrimination and harassment at the workplace?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Do you have a written policy on prevention of harassment and grievance handling?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section D – Health, Safety and Working Conditions

Particulars	Details
1. Do you provide a safe and hygienic workplace for all workers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are safety training, PPE, and emergency preparedness measures in place?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Have there been any serious workplace accidents or fatalities in the last three (3) years?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details: _____

Section E – Environmental Practices

Particulars	Details
1. Are you compliant with applicable environmental laws and permits?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Do you have measures in place to manage waste, emissions, and resource consumption responsibly?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section F – Ethics, Integrity And Governance

Particulars	Details
1. Do you have policies or controls to prevent bribery, corruption, and unethical business practices?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are employees trained on ethical conduct and compliance requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section G – Supply Chain Management

Particulars	Details
1. Do you require your subcontractors or suppliers to comply with labour and human rights standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are you willing to flow down KDDL's Supplier Human Rights Code of Conduct to your subcontractors?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section H – Audits and Disclosure

Particulars	Details
1. Are you willing to permit audits or assessments by KDDL or its authorised representatives, upon reasonable notice?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Do you agree to promptly notify KDDL of any material violation of applicable laws or KDDL policies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section I – Declaration and Undertaking

I/We hereby declare that the information provided in this SAQ is true, complete, and accurate to the best of my/our knowledge. I/We acknowledge KDDL's Supply Chain Policy and Supplier Human Rights Code of Conduct and commit to comply with the same.

I/We understand that any false or misleading information may result in corrective action, suspension, or termination of business relationship with KDDL.

Authorized Signatory

(Name)

(Designation)

(Signature)

(Date)

(Company Seal)

This SAQ forms an integral part of KDDL's supplier onboarding and ongoing due diligence process.