

CODE OF CONDUCT – CORPORATE

Introduction

Sudarshan is a leading color & effect pigment manufacturer. Sudarshan started manufacturing with a handful of inorganic pigments and has since flourished with a breadth of products that cover classical azo pigments, high performance pigments, effect pigments and pigment dispersions. We primarily serve the coatings, plastics, inks and cosmetics markets.

Sudarshan would like the products offered to its customers to be manufactured under ethically acceptable conditions. The Code of Conduct is a collection of these ethically acceptable conditions. Our goal is to continually improve the production environment and the working conditions from both the ethical and the social point of view. The Code of Conduct applies to all business partners, their company divisions and production facilities that manufacture products or raw materials for Sudarshan.

Ethics

1. Sudarshan do not support Bribery and corruption.
2. All the documents records reports should be genuine and reliable.
3. All the partners with whom business is done should be well aware of Sudarshan position on business ethics.
4. We respect intellectual property rights, protect trade secrets and confidential information, and ensure that transfer of technology and know how it is protected from onward.
5. We never engage in or support unfair or predatory business practices or any activities that would improperly restrain trade. It is also critical to avoid any activity that will violate competition laws.
6. None of our input raw materials, labour or any part of manufacturing process is sourced from a declared civil war zone

Human Rights

We comply with national and international legal requirements and ensure that -

1. We reject child labour and comply with minimum ILO-Convention 138 concerning minimum age for admission to employment.
2. We do not have any form of forced labour and comply with ILO-Convention C029 and refrain from using any work performed involuntarily under the threat of disciplinary action.
3. Sudarshan follows a “NO GIFT ACCEPTANCE POLICY”. No employee may accept any gift from those who have, or are likely to have, business relationship with Sudarshan.
4. Sudarshan comply with ILO convention C111 of discrimination and has a policy of zero tolerance for discrimination, sexual harassment or any other harassment based on race, colour, religion, age, gender, sexual orientation, expression, nationality, disability, marital status or any other protected category under applicable law.
5. We have and comply with ILO convention C100 of equal remuneration policy that meets local minimum wage levels and provide social benefits in accordance with national and international standards.
6. We regulate the working hours of each employee in- accordance with national law and international laws. Employee are not working more than forty-eight (48) hours per week excluding overtime. Overtime hours are on a work basis.
7. Employees have at least one day off in a week.
8. We follow all the requirements of national laws and regulations related to freedom of association as mentioned in ILO C087 convention.

9. Sudarshan follow all the requirements of national laws and regulations related to organize and collective bargaining as mentioned in ILO C098 convention.

Zero tolerance for land grabs

Zero tolerance for land grabs secure rights to land and natural resources are an essential element to achieve development by reducing uncertainties and facilitating long term investments by farmers and by public and private investors.

Sudarshan is against all forms of land acquisitions that are illegal and/or have an adverse impact on local communities' livelihoods. It is committed to develop its business in a way that complies with national laws and respects human rights, and particularly the customary rights to land and natural resources that are impacted or potentially impacted by the company's business activities. Sudarshan has a zero tolerance for land grabs and seeks the support of those who could be affected by investment decisions prior to decisions being taken.

Health and Safety

Sudarshan conducts operations with the highest regard for the safety and health of employees and the protection of the general public. Sudarshan is committed to complying with environmental laws and regulations.

Our organization is committed in providing safe working condition including-

- Provide appropriate safety protections to our employees
- We maintain and process safety programs to prevent or mitigate catastrophic events.
- Conducting risk assessments and implementing emergency preparedness plans and response procedures.
- Sudarshan provides safety and hazard information for the safe use of our products.
- All machinery and other equipment used in production and operations are safe to use and equipped with the necessary safety devices in order to prevent injuries.
- Sudarshan is committed to maintaining a safe and drug-free environment for all its employees. Employees are not allowed to smoke, consume oral tobacco products, alcohol or any kind of narcotic drugs during working hours in the premises of the organization. The special squad may conduct periodic inspections for compliance during office hours, any employees who are found in breach of this policy, will be subject to disciplinary action.

Environmental Safety

Sudarshan comply with environmental management system with ISO 14001:2015 and ISO 45001:2018 standards. The reduction of emissions and waste and steps to increase resource efficiency is taken into account. We expect our business partners must meet the generally accepted and contractually agreed quality requirements. Sudarshan have a suitable quality and environmental management system to manage processes and comply with laws in accordance with applicable safety standards. We demand continuous improvement from our business partners by resolving identified deficiencies.

Control the risk of Money Laundering and Counter-Terrorism Financing

1. Customers – all customers we transact with are onboarded after due diligence process, we collect documents like VAT / GST registrations, company incorporation documents, tax identification number etc. These requirements are incorporated in customer master data creation process.
2. Vendors – similar to customer, vendors are also onboarded after following due diligence requirements like checking the vendor infrastructure, ownership structure (check with procurement team for details of vendor onboarding process). Also on regular basis tax team checks compliances of vendor in terms of return filings etc.
3. Company is not into financing business and investments are only into wholly owned subsidiaries of the company. No investments are allowed without board approvals and shareholder's approval.
4. Employees – all employees before hiring go through a rigorous background check process which ensures employees are not involved in unethical practices and unlawful activities.

Confidentiality

The successful implementation of code of conduct depends on co-operation, mutual trust and respect between Sudarshan and our business partners. All observations, discussions and written information received from the business partners are treated confidential by Sudarshan.

Product Responsibility

Sudarshan set the highest standards for the quality of products and support our customers in the safe and environmentally friendly handling of our products. We inform our customers of the risks associated with their use. Sudarshan endeavour to design all products safely and to comply with all applicable requirements and the specified hygiene criteria required and complete documentation to be guaranteed.

Communication

Sudarshan encourages its business partners to seek guidance regarding our policies when needed and to raise concerns regarding activities that may involve illegal activity, violations of policy or unethical conduct, including violations of Code of Conduct for Sudarshan employees.



Rajesh Rathi
Managing Director
Sudarshan Chemicals Industries Limited