

# **Coforge Limited**

## **Supplier Code of Conduct**

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## **Message from Head of Procurement**

*Coforge Limited is known for conducting its business with a strong commitment to ethical practices and sustainability. Our company ethos is deeply rooted in integrity and responsible behavior, and we extend this ethos to our suppliers. We believe in fostering partnerships with suppliers who share our values and principles.*

*We invite our suppliers to fully embrace the Supplier Code and integrate its values and principles into all interactions with us.*

*Together, we can cultivate and sustain responsible, diverse, and ethical supply chains, furthering our collective commitment to excellence and integrity in business. We look forward to partnering with you on this journey.*

**Signature**

A handwritten signature in blue ink that reads "Anant Prafay". The signature is written in a cursive style and is underlined.

**Designation** : Chief Procurement Officer

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## 1. Introduction

The Supplier Code of Conduct (SCoC) pertains to all suppliers, vendors, contractors, and companies that supply products and services to Coforge. The code delineates our expectations regarding compliance and business conduct, emphasizing the importance of adhering to environmental, social, and governance best practices.

The term “Supplier” is an external entity or business that provides goods, materials, services, or resources to Coforge for supporting its operations, production processes, or service delivery (the terms ‘supplier’ and ‘vendor’ will be used interchangeably throughout). Our suppliers play a crucial role in the supply chain, contributing to our ability to deliver services, or fulfill customer needs.

Coforge maintains a steadfast commitment to integrity and transparency in all its business transactions, ensuring ethical, sincere, and open conduct always. We extend this expectation to our suppliers, urging them to embrace the values of integrity and ethics in every business interaction.

## 2. Compliance with Legal requirements

We require our suppliers to adhere to local and national laws, as well as Coforge's guidelines, appropriate authorizations, and obligations, including the following:

1. Labour Management & Human Rights
2. Occupational Health & Safety
3. Confidentiality and Data Protection
4. Ethical Business Dealing & Compliance
5. Environmental Sustainability

### 2.1 Labour Management and Human Rights

Coforge is committed to ensuring fair labour practices in our business operations and upholding human rights of all our employees, workers and along our supply chain. As highlighted in our Human Rights Policy, we have extended certain human rights commitments to our Suppliers as well. We expect our Suppliers to align with these commitments and at a minimum adhere to the following:

1. Suppliers must uphold compliance with all relevant local and national laws, regulations, licenses, and restrictions concerning employment practices, benefits, health and safety, and antidiscrimination.
2. Suppliers are required to establish and maintain written labor/workplace management policies and standards; including adherence to the laid down UNGC Principles and Human Rights Guiding Principles.
3. A workplace environment free from any form of discrimination, harassment, or bullying must be provided by suppliers. This includes protection against discrimination based on gender, age, race, nationality, disability, family responsibilities, marital status, medical history, political beliefs, pregnancy, religion, sexual orientation, union membership, physical appearance, social background, or caregiving responsibilities.
4. Equal treatment of workers in terms of salaries, recruitment, training, promotion, and working conditions must be ensured by suppliers, regardless of factors such as ethnicity, sexual orientation, gender, age, union membership, or political and religious affiliations.
5. Compliance with minimum working hours and wages, as mandated by applicable local laws and regulations, is mandatory.
6. Suppliers must refrain from employing child, forced, or involuntary labor in any capacity.
7. Commitment to providing training and development opportunities for employees is expected from suppliers.

8. Suppliers are obligated to offer fair compensation and working conditions, including adequate rest periods and parental leave, that align with prevailing standards.
9. Consideration of employee needs, risks, and requests as stakeholders in business operations is essential.

## 2.2 Occupational Health and Safety (OHS)

Coforge aims to work with Suppliers who prioritize the health and safety of their employees and workers in their work business operations. Our basic expectations for Suppliers are that they:

1. Establish and adhere to all pertinent local and national regulations, licenses, and restrictions concerning occupational health and safety. This includes maintaining a secure work environment and providing health-related benefits to employees.
2. Vigilantly identify and mitigate health and safety hazards in the workplace, actively monitoring their impacts to prevent accidents and occupational diseases.
3. Maintain comprehensive written safety and health policies and standards, ensuring clarity and accessibility to all employees.
4. Implement a documented system for the identification and reduction of work-related injuries and illnesses, fostering a proactive approach to workplace safety.
5. Develop and execute a structured training program focused on health and safety measures for all employees, empowering them with the knowledge and skills necessary to prioritize their wellbeing in the workplace.

## 2.3 Confidentiality and Data Protection

In line with our [Privacy Statement](#), we are committed to ensuring safeguarding data of our business partners, clients and any party who may be interested in Coforge's business services and solutions. Suppliers must ensure confidentiality of any information, acquired through their association with Coforge, that is not available in the public domain. This applies to any information regarding Coforge's employees, clients, vendors, or any other business partners, including in the form of intellectual property. Suppliers must adhere to the following at a minimum:

1. Keep confidential any information not available in the public domain and restrict its use solely for business purposes.
2. Protect any such information from being utilized to gain an unfair advantage for business purposes.
3. To report any breach of confidential information immediately upon learning about said breach.

## 2.4 Ethical Business Dealing and Compliance

Coforge has high standards when it comes to moral and ethical business standards, and we expect our suppliers to reflect these standards in their relationship with us. Our Suppliers must commit to adhere to the following at a minimum:

### 2.4.1. Anti-Corruption & Bribery

All our suppliers must adhere to Coforge's [Anti-Corruption & Bribery Policy](#) by adopting a zero-tolerance approach to any business practices that do not reflect integrity, fairness and professionalism. Coforge expects all third parties representing the company, including vendors, contractors, and distributors, to comply with the principles set out in this policy.

#### 2.4.2. Conflict of Interest

In the case of a conflict of interest with Coforge through financial ties or through a personal relationship with any of its employees, the Supplier must ensure that the conflict is disclosed at the application stage. It is essential that such conflicts are dealt with at a primary stage to safeguard the reputation and interest of our company, as well as our business partners.

Failure to disclose such a conflict may lead to termination of all future relationships with the supplier and Coforge may choose to follow a path of legal action.

### 2.5 Environmental Sustainability

Coforge is committed to integrating environmental sustainability in all our business operations, including along our supply chain. All our Suppliers must adhere to Coforge's Environmental Sustainability Policy and commit to reductions in emissions, promote energy efficiency, reduce waste, and conserve water. Please refer to Section 4: Sustainable Procurement for more information on how we aim to prioritize Suppliers who take protective measures towards the environment in line with ISO Standards.

## 3. Vendor Onboarding Process

All suppliers, vendors, and other business partners are required to undergo prior due diligence and checklist approval in accordance with Coforge's standard operating procedures (SOPs) and approval process. This process encompasses a comprehensive assessment of environmental, economic/financial, social, and governance factors. Coforge will assess each potential partner based on specific parameters, including financial stability, operational strength, scope of business, ownership and legal status, geographic coverage, product and service offerings, business requirements, reputation, social responsibility, sustainability practices, and health and safety standards.

Suppliers at Coforge are onboarded after a rigorous pre-requisite process. Coforge suppliers will be evaluated on their historical background as well as risk impact. Coforge suppliers must provide extensive details at the time of onboarding. The onboarding process is carried out through Coforge's Vendor Portal. Vendors complying with the requirements of the portal will be onboarded.

The suppliers will have to enter into a Vendor Services Agreement with Coforge. The agreement lays out few additional requirements for the suppliers. The agreement entails terms and conditions around payment terms as well as maintaining confidential information (if any) The vendor agreement with Coforge is made for one specific service. Change in the services provided will require the vendor to enter a fresh service agreement with Coforge.

#### Minimum expectations from suppliers

1. Provide all the relevant required information during the process of onboarding. Uphold compliance with all the terms and conditions laid out in the service agreement.
2. Ensure conformance with the due diligence and verification process that Coforge has in place.
3. Maintain the required minimum standard as mentioned within the service agreement with Coforge.
4. Vendor must comply with labor management and human rights laws and regulations.

Coforge's vendor evaluation criteria include sustainability factors like environmental impact, social responsibility, and ethical governance practices. Due diligence is carried out to assess ethical behavior and compliance performance of vendors; through the extensive process of vendor onboarding at Coforge, it is ensured that sustainability parameters are integrated at various stages of supply chain.

#### 4. Sustainable Procurement

To reduce environmental impact of Coforge's procurement process and encouraging suppliers to act sustainably, Coforge engages with their supply chain partners and encourages them to adopt safe practices and deliver products/services with minimal environmental impact throughout the production-to-delivery cycle. Coforge values relationship with its suppliers and thus choosing the suppliers that share a similar goal and approach is very important to Coforge. Company's procurement process is an extension of company values and applies to entire supply chain of Coforge, in turn, focusing on sustainability across company's business.

Coforge prefers suppliers that use eco-friendly, energy-efficient, and low-pollution products. Suppliers that dispose of goods through authorized agencies/recyclers in an environmentally friendly manner are given preference. Coforge grants precedence to suppliers that prioritize water-efficient products to reduce water usage. Suppliers sourcing fewer toxic products and chemicals to minimize health risks will be given preference over other suppliers. Coforge requires its suppliers to monitor and evaluate sustainability performance, while identifying opportunities for improvement. Coforge encourages its suppliers to foster a safe and health workplace for their employees. Suppliers of Coforge are encouraged for optimization of logistics, and applying circular economy principles (reduce, recover, recycle & reuse). Coforge prefers suppliers that use recycled or partially recycled products to optimize their energy consumption.

Suppliers of Coforge are expected to provide services and products while conducting their business operations in a manner that does not harm the environment. Suppliers who take protective measures for environment and have sustainable environment management system in place (aligned with ISO 14001 standard) will be given preference.

##### Minimum expectations from suppliers

1. Establish and uphold compliance with all pertinent local and national laws, regulations, licenses, and restrictions related to land and water management, waste, and recycling, handling and disposal of toxic substances, emissions, air and water quality, noise, transportation, material selection, environmental management, and community consultation. This encompasses fulfilling environmental permit and reporting obligations.
2. Develop and maintain a clearly defined written environmental policy, outlining the organization's commitment to environmental stewardship and compliance.
3. Create and maintain a comprehensive written environmental management plan aimed at identifying and mitigating the impact of business activities on the environment.
4. Proactively identify environmental risks associated with business activities, products, or services, and develop mitigation plans to minimize their impact. Implement energy, water, and waste reduction programs to further mitigate environmental impact and promote sustainability.

## 5. Vendor Feedback

Coforge reserves the right to periodically request specific information from its suppliers regarding their adherence to these Standards of Conduct. This is necessary for Coforge to fulfill its obligations in monitoring, reporting, and verifying its supply chain. Suppliers of Coforge are expected to comply with such requests fully and promptly.

Coforge is dedicated to fostering responsible business growth and upholding our commitment to local communities. Our approach involves actively listening to and understanding the challenges faced by these communities, striving to conduct business in a manner that enhances social capital and generates positive outcomes. We seek out suppliers who embrace this ethos, evident through their engagement with community stakeholders and sustained, strategic participation in community partnerships aimed at tackling significant social issues. Whenever feasible, Coforge prioritizes partnering with local suppliers to promote deeper community involvement and collaboration. Suppliers of Coforge are required to promptly report any concerns they become aware of regarding Coforge's financial affairs, accounting practices, auditing matters, corruption, fraud, or any behavior by Coforge employees that does not align with the standards outlined in this Code.

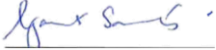
Vendor feedback is collected and analysed for continuous improvement. Vendor may report and notify any violations by email to [vendorgrievance@coforge.com](mailto:vendorgrievance@coforge.com)

This code of conduct is owned by Procurement and Sustainability team, who will be responsible for making suitable amendments, if any, from time to time. This code of conduct does not limit a supplier's obligations as per their contract with Coforge.



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**Gautam Samanta President**

A handwritten signature in blue ink, appearing to read "Gautam Samanta", is positioned above a horizontal line.