

TCE

Supplier Code
of Conduct
Policy



TATA CHEMICALS EUROPE

Supplier Code of Conduct **Policy**

Policy Overview

The TATA Group has always epitomised the true spirit of business ethics in its interactions with all of its Stakeholders – be it the customers, suppliers, employees, shareholders, governments, or society at large.

TATA Chemicals Europe, which comprises Tata Chemicals Europe Limited, Winnington CHP Limited and British Salt Limited (together “TCE”) is proud of this heritage and we are doing everything we can to sustain this tradition. TCE is committed to the TATA Code of Conduct (TCoC), and expects all suppliers to adhere to the principles of this TCoC. For this purpose, TCE has drawn up this Supplier Code of Conduct, which is applicable to all TCE Suppliers globally.

NOTE: In the context of this document, “Supplier” references any business, company, corporation, person, or other entity that provides, sells, or seeks to sell any kind of goods or services to TCE (including but not limited to the Suppliers, employees, agents, and other representatives).

This Policy covers the following specific areas of conduct:

1. Products and Services
2. Regulatory Compliance
3. Bribery and Corruption
4. Child Labour
5. Forced Labour
6. Health & Safety
7. Environment
8. Gift and Hospitality
9. Conflicts of Interest
10. Protecting Company Assets
11. Confidential Information
12. Supply Chain Integrity
13. Monitoring
14. Reporting Violations

Products and Services

The Supplier shall be committed to supplying products and services of high quality, which meet all applicable standards and comply with all applicable laws (including product packaging, labelling and after-sales service obligations). In addition, the Supplier shall market its products on their own merits, and not make unfair or misleading statements about the products and services of competitors.

Regulatory Compliance

The Supplier shall comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which it operates.



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Bribery and Corruption

The Supplier shall not engage in any form of bribery or corruption. TCE's Anti-Bribery Policy is published on our website <https://www.tatachemicalseurope.com> or by e mail on request.

Child Labour

The Supplier shall not employ or engage children under the age of 16, and shall ensure that no member of their supply chains shall do so, regardless of whether the employment of people under that age may be permitted under local laws or customs.

Forced Labour

The Supplier shall not use forced or slave labour of any type (e.g. bonded, indentured, prison, or involuntary labour) and shall ensure that no member of their supply chains shall do so.

Health and Safety

The Supplier shall provide a safe, healthy, and clean working environment for its employees. TCE is happy to provide a copy of our own Health and Safety Policy via email at a Suppliers request.

Environment

The Supplier shall strive for environmental sustainability, particularly with regard to the emission of greenhouse gases, the consumption of water and energy, and the management of waste and hazardous materials. The Supplier shall endeavour to offset the effect of climate change in its activities.

Gifts and Hospitality

It is TCE policy that no TCE personnel may accept from Suppliers gifts or hospitality unless they are:

- "Branded" goods which are nominal in value eg Supplier branded calendar
- Appropriate in their nature
- Compliant with all our other company policies

Suppliers should not offer any other form of gift, hospitality to any TCE personnel at any time.

Third Party Representation

The Supplier is not authorised to represent TCE in any aspect, in any environment, without the prior written permission of the TCE Head of Procurement. This also includes all use of the TATA/TCE logo or branding.



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Conflict of Interest

The Supplier shall proactively notify TCE if the Supplier or any of its representatives becomes aware of any actual or potential conflict of interest relating to TCE. For example, if it becomes aware that it employs a relative or partner of a TCE person.

Protecting Company Assets

The assets of TCE shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorised. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources, as well as intangible assets such as proprietary information, intellectual property, and relationships with value chain partners of TCE.

Confidential information

Without prejudice to the terms of any confidentiality agreement entered into between the Supplier and TCE or part thereof, if the Supplier becomes aware of non-public information relating to TCE, its business or that of any group company, customer or supplier of TCE, it may not engage in any action that would take advantage of that information, including passing that information on to other parties or making the same public.

Supply Chain Integrity

The Supplier is expected to implement its own binding Supplier Code of Conduct, and is expected to make reasonable efforts to promote the principles of this code in its own Supply Chain. In circumstances where this does not currently exist, TCE would expect a Supplier to promote the rules and ethics of the TATA Code of Conduct throughout its Supply Chain.

Monitoring

The Supplier shall maintain adequate documentation to demonstrate compliance with the principles of this code, and allow TCE access to check this compliance upon request (a fair and reasonable notice period for these requests will be agreed upon with the Supplier).

Reporting Violations

The Supplier shall notify TCE regarding any known or suspected improper behaviour by either its own employees, or TCE employees by email to: tcecommunications@tatachemicals.com or our whistle blowing or global ethics line.

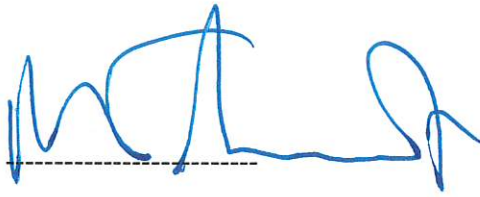
For further information you will find TCE's Whistleblowing Policy published on our website <https://www.tatachemicalseurope.com>



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TCE is also happy to provide a copy of our Whistleblowing Policy via email at a Suppliers request. TCE will investigate and deal with such reported violations in good faith, in strict confidence and in accordance with the Whistleblowing Policy.



Dr Martin Ashcroft
Managing Director

Date: 7/7/20



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