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## 1. PURPOSE

Carrier Wheels Pvt. Ltd. ("CWPL") recognizes that procurement decisions influence environmental, social, and ethical performance across the supply chain.

This Policy establishes CWPL's commitment to responsible, ethical, and sustainable procurement practices, integrating environmental, social, and governance (ESG) considerations into supplier selection and management.

## 2. SCOPE & APPLICABILITY

This Policy applies to:

- Procurement of goods, materials, components, and services
- All suppliers, vendors, contractors, and service providers
- Employees involved in procurement, supplier selection, and vendor management

Compliance with this Policy is mandatory.

## 3. POLICY COMMITMENT

CWPL commits to:

- Procuring responsibly and ethically
- Complying with applicable laws and regulations
- Minimizing environmental and social risks in the supply chain
- Promoting continuous improvement among suppliers

## 4. SUSTAINABLE PROCUREMENT PRINCIPLES

CWPL's procurement practices are guided by the following principles:

**a) Ethical Business Conduct**

- Zero tolerance for bribery, corruption, fraud, or unethical practices
- Compliance with CWPL's Code of Conduct and Anti-Corruption policies

**b) Labour & Human Rights**

- Prohibition of child labour, forced labour, and human trafficking
- Respect for fair working conditions, wages, and freedom of association
- Safe and healthy workplaces

**c) Environmental Responsibility**

- Compliance with environmental laws and permits

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- Efficient use of energy, water, and natural resources
- Proper waste management and pollution control

**d) Health & Safety**

- Safe working conditions for supplier employees
- Compliance with occupational health & safety requirements

## 5. SUPPLIER SELECTION & ONBOARDING

CWPL ensures that:

- Suppliers are selected based on quality, cost, delivery, and ESG considerations
- New suppliers undergo basic due diligence and risk assessment
- Supplier capability and compliance are evaluated before onboarding

## 6. RISK-BASED SUPPLIER ASSESSMENT

CWPL adopts a risk-based approach to supplier assessment, considering:

- Nature and criticality of goods or services
- Regulatory and compliance exposure
- Environmental and social risks
- Past performance and audit outcomes

Higher-risk suppliers may be subject to enhanced assessment or audits.

## 7. SUPPLIER MONITORING & AUDITS

CWPL may monitor supplier performance through:

- Supplier self-assessments
- Capability assessments
- Quality, safety, or compliance audits
- Review of corrective action plans

Non-conformances may require corrective actions within defined timelines.

## 8. CORRECTIVE ACTION & CONTINUOUS IMPROVEMENT

If gaps are identified:

- Suppliers may be required to implement corrective actions
- CWPL may support improvement through guidance or follow-up

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- Repeated or serious violations may lead to review or termination of the business relationship

**9. COMMUNICATION & SUPPLIER ENGAGEMENT**

CWPL:

- Communicates sustainability expectations to suppliers
- Encourages suppliers to improve ESG performance
- Promotes long-term and responsible supplier relationships

**10. RECORD KEEPING & DOCUMENTATION**

CWPL maintains records related to:

- Supplier assessments and audits
- Corrective actions and follow-ups
- Supplier performance reviews

**11. REPORTING & NON-RETALIATION**

Employees and suppliers are encouraged to report:

- Unethical or non-compliant procurement practices
- Violations of labour, environmental, or ethical standards

CWPL prohibits retaliation against individuals reporting concerns in good faith.

**12. ROLES & RESPONSIBILITIES**

- **Management**: Oversight of sustainable procurement practices
- **Purchase / HR / QA functions**: Implementation, monitoring, and supplier engagement
- **Employees**: Compliance with procurement procedures and ethical standards

**13. AWARENESS & TRAINING**

- This Policy shall be communicated to relevant employees
- Awareness may be provided through internal training or communication
- Employees involved in procurement are responsible for understanding this Policy

**14. MONITORING & CONTINUOUS IMPROVEMENT**

CWPL periodically reviews its procurement practices to:

- Identify sustainability risks and opportunities
- Improve supplier engagement and performance

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- Strengthen responsible sourcing

**15. APPROVAL & EFFECTIVE DATE**

This Sustainable Procurement Policy is approved by the Management of Carrier Wheels Pvt. Ltd. and is effective from the date of issue.

| | Name/Designation | Signature | Remarks for Revision |
|---|---|---|---|
| Prepared By: | Amit Saroha<br>Deputy Manager |  | |
| Approved by: | Apoorva Jain<br>Director |  | |