Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

Contents

1. PURPOSE 2
2. SCOPE & APPLICABILITY 2
3. POLICY STATEMENT 2
4. THIRD-PARTY DUE DILIGENCE FRAMEWORK 2
5. RISK-BASED ASSESSMENT 3
6. RESPONSIBLE BUSINESS EXPECTATIONS 3
7. MONITORING & ASSESSMENT 3
8. CORRECTIVE ACTION & ESCALATION 3
9. RECORD KEEPING & DOCUMENTATION 4
10. REPORTING & ESCALATION OF CONCERNS 4
11. NON-RETALIATION 4
12. ROLES & RESPONSIBILITIES 4
13. AWARENESS & COMMUNICATION 4
14. REVIEW & CONTINUOUS IMPROVEMENT 4
15. APPROVAL & EFFECTIVE DATE 5

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

1. PURPOSE

Carrier Wheels Pvt. Ltd. ("CWPL") recognizes that its business partners, suppliers, contractors, and service providers play a critical role in its operations and reputation.

This Policy establishes CWPL's framework for conducting due diligence on third parties and ensuring that business relationships are conducted responsibly, ethically, and in compliance with applicable laws and company standards.

2. SCOPE & APPLICABILITY

This Policy applies to:

- Suppliers and vendors
- Contractors and subcontractors
- Consultants, agents, and service providers
- Any third party acting on behalf of CWPL

This Policy applies throughout the lifecycle of third-party engagement, including onboarding, renewal, and ongoing monitoring.

3. POLICY STATEMENT

CWPL is committed to engaging with third parties who:

- Conduct business ethically and transparently
- Comply with applicable laws and regulations
- Respect labour, human rights, health & safety, and environmental principles
- Avoid bribery, corruption, fraud, and unethical practices

CWPL adopts a risk-based due diligence approach for third-party evaluation and monitoring.

4. THIRD-PARTY DUE DILIGENCE FRAMEWORK

CWPL conducts due diligence based on the nature, risk, and criticality of the third party.

Due diligence may include:

- Business profile and legal registration verification
- Assessment of financial and operational capability
- Review of compliance with labour, safety, and environmental practices
- Evaluation of ethical conduct and integrity
- Review of past performance and compliance history

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

5. RISK-BASED ASSESSMENT

Third parties may be categorized based on risk factors such as:

- Nature of goods or services
- Geographic location
- Regulatory exposure
- Level of interaction with CWPL operations
- Criticality to business continuity

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

6. RESPONSIBLE BUSINESS EXPECTATIONS

CWPL expects its third parties to:

- Comply with all applicable laws and regulations
- Prohibit child labour, forced labour, and discrimination
- Provide safe and healthy working conditions
- Follow ethical business practices
- Avoid bribery, corruption, and conflicts of interest
- Respect environmental protection requirements

These expectations may be communicated through contractual terms, supplier assessments, or codes of conduct.

7. MONITORING & ASSESSMENT

CWPL may monitor third-party compliance through:

- Supplier risk assessment questionnaires
- Capability assessments
- Periodic audits or inspections
- Performance reviews and quality audits

Non-conformances, if identified, may require corrective actions.

8. CORRECTIVE ACTION & ESCALATION

If a third party fails to meet CWPL's expectations:

- Corrective actions may be requested
- Timelines may be defined for improvement

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

- Business engagement may be reviewed, restricted, or discontinued in case of serious or repeated violations

9. RECORD KEEPING & DOCUMENTATION

CWPL maintains appropriate records related to:

- Third-party assessments
- Audit findings
- Corrective actions
- Ongoing monitoring

Records are retained in accordance with internal procedures and legal requirements.

10. REPORTING & ESCALATION OF CONCERNS

Employees are encouraged to report:

- Suspected unethical or unlawful behavior by third parties
- Fraud, corruption, or compliance violations involving business partners

Reports may be raised through established grievance or whistleblower mechanisms.

11. NON-RETALIATION

CWPL prohibits retaliation against employees who raise concerns regarding third-party conduct in good faith.

12. ROLES & RESPONSIBILITIES

- **Management**: Oversight of third-party risk and compliance
- **HR/Admin / Purchase / QA functions**: Due diligence, assessment, and monitoring
- **Employees**: Adherence to procedures and reporting concerns

13. AWARENESS & COMMUNICATION

- This Policy shall be communicated internally
- Relevant third parties may be informed of CWPL's expectations
- Employees involved in procurement or vendor management are expected to understand this Policy

14. REVIEW & CONTINUOUS IMPROVEMENT

This Policy shall be reviewed periodically to:

- Address emerging risks
- Strengthen responsible business practices

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

- Ensure alignment with legal and operational requirements

15. APPROVAL & EFFECTIVE DATE

This Third-Party Due Diligence & Responsible Business Partner 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 Deputy Manager		
Approved by:	Apoorva Jain Director		