

2025

# STAKEHOLDER CODE OF CONDUCT

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## **JMF PERFORMANCE MATERIALS PVT. LTD.**

### **SUPPLIER CODE OF CONDUCT**

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#### ***VISION***

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Our core vision is to trade, warehouse, and distribute a comprehensive range of Synthetic Rubbers, Special Performance Rubber Chemicals, and Resins. We pledge to meet and exceed our customers' present and future needs through unwavering dedication to quality, punctuality, competitive pricing, and environmentally sustainable practices. By constantly evolving and adopting eco-friendly processes, we aim to contribute to a sustainable future while ensuring the utmost satisfaction of our clientele.

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#### ***PURPOSE***

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Our purpose at JMF Performance Materials Pvt. Ltd. is to lead in the commerce, storage, and distribution of an extensive selection of Synthetic Rubbers, Special Performance Rubber Chemicals, and Resins. Our steadfast commitment is to not just meet but to surpass our clients' immediate and long-term demands by consistently delivering exceptional quality, ensuring timely fulfillment of orders, and providing value through competitive pricing. We are devoted to integrating and advancing environmentally responsible methods within all facets of our operations. Embracing sustainability as a driving force, we continually seek to adopt processes that protect and enhance our planet. Our aim is to forge a path toward a more sustainable industry while providing our customers with unparalleled service and satisfaction.

We, JMF PERFORMANCE MATERIALS PVT. LTD. expects all of its employees and subcontractors to comply with the law and act ethically in all matters. We have same expectations for our suppliers and service providers to act in sustainable manner and comply with our supplier code of conduct.

As such, our supplier code of conduct is integrated into our day-to-day operations and is a fundamental part of our Supplier Qualification, Development and Evaluation Requirements.

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#### ***WORKFORCE RIGHTS AND WELFARE***

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Suppliers and service providers shall commit to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.



### **1) Voluntary Employment:**

Suppliers must ensure that all forms of forced, bonded, or indentured labor, involuntary prison labor, and human trafficking are strictly prohibited. This prohibition includes any activity involving the transport, harboring, recruitment, transfer, or receipt of individuals through threat, force, coercion, abduction, or fraud. Workers must have freedom of movement within the workplace and free access to and from company facilities without unreasonable restrictions. A clear, written employment agreement in the English language must be provided at the time of hiring. All labor must be voluntary, with employees free to terminate their employment at any time without penalty. Workers should not be charged recruitment or other fees exceeding one month's salary.

### **2) Prevention of Child Labor:**

The use of child labor in any part of the supply chain is unacceptable. For this Code, a "child" is defined as anyone under the age of 15, or 14 where local law allows, or below the age required for completing mandatory schooling, or below the minimum employment age. We endorse legitimate apprenticeship programs that comply with all legal standards. Workers under 18 are not to be employed in hazardous conditions that may affect their health or safety, including night shifts and overtime.

### **3) Regulation of Working Hours:**

Consistent with studies linking excessive working hours to decreased productivity, higher employee turnover, and increased accidents, workweeks shall not exceed local legal limits. Under normal circumstances, the workweek should not exceed 48 hours. Workers must receive at least one day off for every seven days worked, and any overtime must adhere to local laws regarding compensation.

### **4) Fair Wages and Benefits:**

Compensation for all workers must meet or exceed legal minimums for wages, overtime pay, and mandated benefits. No disciplinary deductions are allowed. Wage statements must be provided each pay period, offering clear and detailed information to confirm correct compensation for hours worked. Employment of temporary, dispatch, and outsourced labor must comply with local regulations.

### **5) Humane Working Conditions:**

Workers shall be treated with respect and dignity. No worker shall be subject to any physical, sexual, psychological, or verbal harassment or abuse. Suppliers must have clear, communicated policies and procedures to prevent and address any form of mistreatment.

### **6) Equality and Non-Discrimination:**

All employment practices, from hiring through promotion and beyond, must be free of discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, or any other status protected by law. Equal pay for equal work must be strictly enforced. Suppliers must not conduct or require medical tests that could be used in a discriminatory manner.

### **7) Right to Organize:**

The rights of workers to freely associate, join trade unions, bargain collectively, and engage in



peaceful assembly must be respected. Conversely, workers must also have the right to abstain from such activities if they choose. There must be no fear of retaliation, intimidation, or harassment for workers who engage in or refrain from such activities. Workers should be able to discuss working conditions and management practices openly without fear of reprisal.

**9) Intellectual Property and Confidentiality:**

Suppliers are required to respect intellectual property rights and handle all sensitive information with the highest standards of confidentiality and security. The unauthorized use, duplication, or dissemination of proprietary information, including technology and trademarked material, is strictly prohibited. Suppliers must ensure that all their subcontractors and affiliates adhere to these confidentiality standards as well.

**10) Compliance with Anti-Corruption Laws:**

Suppliers must not engage in any form of corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. This includes a prohibition on offering or accepting bribes or other means of obtaining undue or improper advantage. Suppliers should have policies in place to educate their employees on anti-corruption practices and enforce compliance with these policies through monitoring and enforcement mechanisms.

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## **HEALTH & SAFETY**

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Suppliers and service providers shall commit to providing and maintaining a safe work environment that integrates sound health and safety management practices into its business. Suppliers shall provide workers with appropriate health and safety training in their primary language and shall regularly monitor risks and hazards that may impact health and safety of workers.

**1. Occupational Safety:**

We require that all suppliers and service providers manage and minimize workplace risks. Effective design, engineering controls, and administrative policies should be utilized to mitigate hazards associated with electrical systems, fire, machinery, and falls. Continuous safety training and proper maintenance routines should be enforced, including lockout/tagout procedures. Should these controls be insufficient, suppliers must equip workers with personal protective equipment and educate them on its use. Encouragement of proactive communication about safety concerns is mandatory, with a strict policy against penalizing those who raise these issues.

**2. Emergency Preparedness:**

Suppliers must develop, maintain, and execute comprehensive emergency response plans that include detailed procedures for incident reporting, employee alerts, evacuations, and emergency drills. Facilities must be equipped with suitable fire detection and suppression tools, and exits must accommodate all personnel in emergency scenarios. These plans should aim to substantially reduce potential damages to human life, environmental integrity, and property.



### **3. Occupational Injury and Illness:**

It is essential for suppliers to establish protocols that prevent, manage, and document occupational injuries and illnesses. Systems should support employee reports, categorize health incidents accurately, provide prompt and adequate medical treatment, and facilitate thorough investigations and remedial actions. Additionally, these measures must support the seamless reintegration of returning workers.

### **4. Industrial Hygiene:**

Suppliers are required to evaluate and control exposure to hazardous chemical, biological, and physical agents. Control measures should primarily include engineering and administrative adjustments; however, where exposure risks persist, comprehensive personal protective equipment programs must be instituted.

### **5. Physically Demanding Work:**

The assessment and mitigation of risks from physically demanding tasks are crucial. This includes, but is not limited to, tasks involving manual material handling, heavy or repetitive lifting, prolonged standing, and forceful or repetitive assembly operations.

### **6. Machine Safeguarding:**

All machinery must be regularly inspected for safety hazards. Adequate physical safeguards, such as guards, interlocks, and barriers, must be implemented and maintained to protect workers from machinery-related injuries.

### **7. Sanitation, Food, and Housing:**

All workers should have unrestricted access to clean sanitation facilities, drinkable water, and hygienic food preparation areas. If housing is provided, it must be safe, clean, and conducive to good health, including proper emergency exits, adequate bathing facilities, sufficient heating and ventilation, and reasonable personal and communal space.

### **8. Health and Safety Communication:**

Effective health and safety training programs must be provided in languages understandable to all workers. Health and safety information, including notices and updates, should be prominently displayed within the workplace to ensure that all employees are informed of relevant standards and procedures.

### **9. Environmental Health:**

Suppliers and service providers must actively manage the health risks associated with environmental factors. This includes the control of exposure to airborne toxins, noise pollution, and any other environmental hazards that could affect employee health. Regular environmental risk assessments must be conducted, and findings should lead to immediate and effective action to mitigate any identified risks. Compliance with all applicable environmental health regulations is mandatory.

### **10. Ergonomics:**

Suppliers are required to implement ergonomic solutions that prevent musculoskeletal disorders and other injuries related to ergonomic factors. This includes the design and arrangement of



workstations, tools, and workflows to promote good posture, reduce repetitive motions, and prevent awkward movements. Ergonomic risks must be regularly assessed, and employees should receive training on ergonomics to understand the best practices for minimizing strain and injuries.

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## *ENVIRONMENT*

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At JMF Performance Materials Pvt. Ltd., we understand that environmental stewardship is crucial to producing world-class chemicals. We are committed to minimizing adverse effects on the community, the environment, and natural resources while ensuring public health and safety.

### **1. Environmental Permits and Reporting:**

Suppliers and service providers are required to obtain and maintain all necessary environmental permits, approvals, and registrations. Compliance with all operational and reporting requirements set by regulatory agencies is mandatory. This includes but is not limited to discharge monitoring and emission controls.

### **2. Pollution Prevention and Resource Reduction:**

We expect our suppliers to actively pursue the reduction or elimination of waste in all forms like modifying production, maintenance, and facility processes, implementing materials substitution and conservation, enhancing recycling and re-use practices.

These efforts should aim at reducing usage of water and energy, thus minimizing environmental footprints.

### **3. Hazardous Substances:**

Suppliers must diligently manage the handling, storage, movement, use, recycling, reuse, and disposal of hazardous chemicals and other materials. The objective is to prevent environmental contamination and ensure these substances are managed safely and responsibly.

### **4. Wastewater and Solid Waste:**

A systematic approach must be adopted to manage, reduce, and responsibly dispose of or recycle solid waste and wastewater from operations:

Regular monitoring and control of wastewater and solid waste emissions from industrial processes and sanitation facilities.

### **5. Air Emissions:**

Control measures must be in place to manage, monitor, and treat emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products:

Routine performance checks of air emission control systems are required.

Compliance with all applicable local and international air quality standards.



#### **6. Materials Restrictions:**

Adherence to laws, regulations, and customer-specific requirements regarding the prohibition or restriction of certain substances is essential. This includes compliance with standards for labeling materials for recycling and disposal.

#### **7. Storm Water Management:**

Suppliers are expected to implement comprehensive measures to prevent stormwater contamination: Strategies should prevent illegal discharges and manage spills effectively. Proper containment systems should be in place to prevent pollutants from entering storm drains.

#### **8. Energy Efficiency and Conservation:**

Suppliers and service providers must strive to improve energy efficiency and reduce greenhouse gas emissions in all operations. This includes adopting energy-efficient technologies, optimizing process and heating efficiencies, and reducing reliance on fossil fuels. Regular energy audits should be conducted to identify and implement energy-saving measures, and performance metrics should be reported periodically to JMF Performance Materials Pvt. Ltd.

#### **9. Biodiversity Conservation:**

Activities conducted by suppliers and service providers should not jeopardize local biodiversity and natural habitats. Efforts must be made to assess and mitigate any impacts on wildlife and ecosystems, particularly in ecologically sensitive areas. This includes implementing management plans that promote habitat preservation and restoration, and prevent potential environmental impacts related to land use and development.

#### **10. Noise Control:**

Operations should not result in unacceptable noise levels that could affect neighboring communities or local wildlife. Suppliers must adhere to local noise regulations and implement best practices in noise reduction, including the installation of sound-dampening systems and the maintenance of machinery to minimize noise pollution.

#### **11. Sustainable Packaging:**

Suppliers are encouraged to use sustainable materials in their packaging and reduce the volume of waste generated through excess packaging. Packaging materials should be recyclable or biodegradable, and the use of non-renewable or hazardous materials in packaging must be minimized. Innovative packaging solutions that reduce environmental impact are strongly supported.

#### **12. Climate Change Mitigation:**

Suppliers and service providers are expected to actively participate in efforts to mitigate the effects of climate change. This includes optimizing production processes to lower carbon footprints, engaging in carbon offset programs, and transitioning to renewable energy sources. Plans and initiatives to reduce carbon emissions should be documented and executed in alignment with global climate goals.



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## ETHICS

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At JMF Performance Materials Pvt. Ltd., we uphold the highest standards of business integrity. We expect all suppliers and service providers to commit to these principles in all dealings.

### **1. Business Integrity:**

Suppliers and service providers must enforce a zero-tolerance policy towards bribery, corruption, extortion, embezzlement, and any form of facilitation payments. Transactions must be transparent and accurately recorded in business books and records. Robust monitoring and enforcement procedures must be established to ensure compliance with anti-corruption laws.

### **2. Prohibition of Improper Advantage:**

Engaging in activities that provide or intend to provide improper advantages is strictly prohibited. This includes, but is not limited to, offering, giving, soliciting, or accepting any item of value, either directly or indirectly, as a bribe or for obtaining an undue advantage.

### **3. Disclosure of Information:**

Full transparency in disclosing information related to labor, health and safety, environmental practices, and business operations must be maintained. Falsification of records or misrepresentation of conditions or practices within the supply chain is unacceptable.

### **4. Intellectual Property Rights:**

Intellectual property rights must be respected at all times. This includes safeguarding sensitive customer information and managing technology transfers in a way that protects these rights.

### **5. Fair Business Practices:**

Suppliers and service providers are expected to conduct business fairly. This includes adhering to fair advertising, marketing practices, and competition laws, ensuring that all business dealings are conducted ethically.

### **6. Protection of Identity and Non-Retaliation:**

A secure mechanism for anonymously reporting grievances and alleged misconduct must be provided to all employees. This system should protect the identities of the whistleblowers and shield them from retaliation.

### **7. Responsible Sourcing of Minerals:**

Suppliers must verify that materials used in manufacturing do not involve "conflict minerals" as defined by the US Dodd-Frank Act. Sourced materials must not come from regions where their extraction funds armed conflict or involves human rights abuses.

### **8. Privacy and Data Protection:**

Suppliers and service providers must respect privacy laws and manage personal information (of customers, employees, and partners) securely and confidentially. Compliance with all applicable privacy and information security laws is mandatory.



**9. Conflict of Interest:**

Employees must avoid conflicts of interest that could affect the integrity of their decisions for the company. They should not use their position for personal gain or to benefit friends, family, or other private interests.

**10. Fraud Prevention:**

All forms of fraud are prohibited, including but not limited to theft, forgery, misappropriation of funds, and manipulation of company assets. Suppliers and service providers must actively prevent any such incidents and ensure integrity in all financial transactions.

**11. Protection of Confidential Information:**

Strict confidentiality must be maintained regarding all proprietary information unless disclosure is authorized or legally mandated. This includes protecting trade secrets, business, and technical information from unauthorized access and disclosure.

**12. Ethical Advertising and Communication:**

Suppliers and service providers must ensure that all advertising and public communications are honest, truthful, and comply with the relevant laws and standards. Misleading, deceptive, or unethical advertising, promotions, or statements are strictly prohibited. This includes adherence to standards governing consumer protection and fair marketing practices.

**13. Compliance with International Trade Laws:**

Suppliers must fully comply with all applicable international trade laws, including sanctions, export control, and import regulations. They must obtain all necessary export and import licenses and make truthful declarations to customs authorities. The integrity of interactions with governmental bodies must be maintained to ensure compliance with trade regulations.

**14. Corporate Governance:**

Suppliers are expected to practice good corporate governance. They should have a clear organizational structure, well-defined roles and responsibilities, and robust internal controls to ensure accountability and proper management of business affairs. This includes regular audits and reviews to ensure compliance with legal, contractual, and ethical standards.

**15. Anti-Money Laundering (AML):**

All business partners must adhere to international anti-money laundering standards. Suppliers and service providers must take prudent measures to prevent their operations from being exploited for money laundering, terrorist financing, or any other financial crimes. This includes having processes in place to accurately identify the source of money, monitor customer transactions, and report suspicious activities to relevant authorities.

**16. Sustainable Business Practices:**

Suppliers and service providers are encouraged to engage in practices that promote long-term economic, social, and environmental sustainability. They should aim to operate in a manner that enhances societal well-being and demonstrates respect for people and the planet in alignment with sustainable development goals.



## **17. Transparency in Regulatory Compliance:**

It is imperative for suppliers to conduct their business in accordance with not only the letter but also the spirit of the laws and to maintain transparency in all regulatory compliance matters. They should engage in open and honest communication with regulatory bodies and ensure all compliance issues are quickly and accurately resolved.

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## **GOVERNANCE**

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### **1. Supplier Commitment:**

The Supplier/Service providers must honor and ensure that they will follow this Code of Conduct in all the respects. It is also expected that the Supplier/Service providers will subsequently follow this with their sub-contractors/ companies they are dealing with.

### **2. Company Commitment:**

Suppliers must uphold a policy statement on corporate environmental, social, and governance responsibility that reflects their commitment to compliance and continuous improvement. This policy must be endorsed by the supplier's executive management.

### **3. Supplier Diversity:**

We are committed to fostering diversity within our supply chain by providing fair opportunities to women-owned, minority-owned, small, and other disadvantaged enterprises. Suppliers are encouraged to engage with businesses owned by women and vulnerable groups, and to promote diversity, equity, and inclusion (DEI) within their own workforce and subcontractors. All procurement decisions must be transparent, merit-based, and free from discrimination, supporting inclusive economic development across the communities we serve.

### **4. Management Accountability and Responsibility:**

Suppliers must appoint designated representatives who are responsible for implementing and maintaining the management systems. These representatives must be accountable to senior management, who should regularly review the management system's effectiveness and compliance.

### **5. Legal and Customer Requirements:**

A structured process must be in place for identifying, monitoring, and understanding all applicable legal, regulatory, and customer-specific requirements, including those detailed in this Code.

### **6. Risk Assessment and Risk Management:**

Suppliers are expected to regularly conduct risk assessments to identify potential environmental, health, safety, labor, and ethics-related risks. Appropriate controls must be implemented to manage these risks, ensuring compliance with regulatory standards.



#### **7. Improvement Objectives:**

Suppliers must establish clear performance objectives and targets, along with detailed plans for achieving these goals. Regular performance evaluations should be conducted to measure success in meeting these objectives and to guide continual improvement efforts.

#### **8. Training:**

Comprehensive training programs must be provided to both managers and workers. These programs should cover the implementation of policies and procedures, achievement of improvement objectives, and compliance with legal and regulatory requirements.

#### **9. Communication:**

Clear and accurate information about policies, practices, expectations, and performance must be communicated to all employees, suppliers, and customers. This communication should be regular and utilize multiple channels to ensure broad understanding.

#### **10. Worker Feedback and Participation:**

Ongoing processes must be established to assess employee understanding of and engagement with the practices outlined in this Code. Suppliers should encourage feedback from employees, which should be used to drive improvements in workplace practices and conditions.

#### **11. Support for Work-Life Balance:**

Recognizing the importance of a healthy work-life balance, JMF Performance Materials Pvt. Ltd supports our employees with programs and policies that allow flexibility, such as remote working options, flexible scheduling, and parental leave policies. We believe that supporting our employees in achieving a balance between their professional and personal lives leads to higher satisfaction and productivity.

#### **12. Audits and Assessments:**

Regular audits and assessments should be conducted to ensure that all practices and performances align with legal, regulatory, and Code requirements. This includes compliance with social and environmental responsibilities outlined in contractual obligations with customers.

#### **13. Corrective Action Process:**

A systematic approach should be implemented to address any deficiencies found during internal or external audits, inspections, or reviews. This process should ensure timely and effective resolution of issues to maintain compliance and performance standards.

#### **14. Documentation and Records:**

All necessary documents and records must be accurately maintained to demonstrate compliance with regulatory requirements and adherence to this Code. Confidentiality measures appropriate to protect personal and sensitive information must be rigorously applied.



#### 15. Grievance Redressal:

For any grievances related to the Code, suppliers and service providers can contact ([samsuddin@jmfindia.com](mailto:samsuddin@jmfindia.com))

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### WHAT TO REPORT

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1. Violations of the Code of Conduct
2. Unethical or illegal behavior
3. Environmental violations
4. Safety hazards
5. Harassment or discrimination
6. Conflict of interest
7. Fraud or theft
8. Data privacy concerns or breaches
9. Any other activities that could harm the company and its employees, customers, or the public

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### CONSEQUENCES OF VIOLATION:

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JMF Performance Materials Pvt. Ltd takes a zero-tolerance approach to any violation of this Code of Conduct, our policies or applicable laws and regulations will be subject to serious disciplinary action, up to and including termination of employment.

Here's a detailed breakdown of potential consequences for violations related to Code of Conduct

#### Internal Disciplinary Actions:

- **Termination of Employment:** Violation of Code of Conduct is considered a gross misconduct offense and will likely result in immediate termination of employment.
- **Demotion or Suspension:** Depending on the severity of the offense and the employee's level of involvement, disciplinary actions may include demotion or suspension without pay.
- **Loss of Benefits:** Employees found guilty of may lose eligibility for company benefits such as health insurance, retirement plans, or stock options.
- **Ineligibility for Future Employment:** Depending on the circumstances, individuals involved in corruption or bribery may be permanently barred from future employment with Speciality Sign Co.



## Legal Repercussions:

Beyond internal disciplinary actions, violations of this code of conduct can lead to significant legal consequences, including:

- **Criminal Charges:** Individuals involved in violation of code of conduct like corruption or bribery may face criminal prosecution, resulting in fines, imprisonment, or both. The severity of the charges will depend on the specific nature of the offense and the applicable laws.
- **Civil Liability:** Companies found to be involved in violation of code of conduct like corruption or bribery may be subject to significant civil penalties imposed by regulatory authorities.
- **De-barment from Government Contracts:** Engaging in corrupt practices may lead to debarment from participating in government contracts, significantly impacting a company's business opportunities.
- **Reputational Damage:** Public exposure of corruption or bribery can severely damage a company's reputation, leading to loss of customer trust and business opportunities.

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## SUPPLIER ACKNOWLEDGEMENT

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By signing this Code of conduct, the supplier further agrees to:

1. Know the laws and regulations of the countries in which his company operates and complies with them
2. Support JMF PERFORMANCE MATERIALS PVT. LTD in deployment of its CSR strategy
3. Be evaluated by JMF PERFORMANCE MATERIALS PVT. LTD. on the principles set out above
4. Put in place the necessary actions to comply with this code
5. Pass on the content of this Code to all of its own suppliers.

**Company Name:** Yasho Industries Limited

**Name and position of the signatory:** Ms Tashmi Kadam (Assistant Manager- Regulatory)

**Date:** 07/08/2025

**Signature:** 

**Company Seal:**

