



# Allied Blenders & Distillers

**ALLIED BLENDERS AND  
DISTILLERS LIMITED**

**(CIN: L15511MH2008PLC187368)**

**SUPPLIER CODE OF CONDUCT**

## **1. PURPOSE**

Allied Blenders and Distillers Limited (hereafter referred to as “ABDL” or “the Company”) is committed to responsible, ethical, and sustainable business practices across its value chain. Suppliers play a critical role in supporting ABDL’s commitments to environmental protection, human rights, workplace safety, product quality, and ethical conduct.

This Supplier Code of Conduct (“Code”) defines the minimum standards expected from all suppliers, vendors, contractors, bottling partners, logistics providers, and service partners engaged with ABDL.

## **2. SCOPE AND APPLICABILITY**

This Code applies to all suppliers and their employees, workers, agents, and subcontractors providing goods or services to ABDL, including suppliers of grains, ENA/distilled spirits, packaging materials, chemicals, machinery, logistics, and contract bottling services.

Compliance with this Code is a mandatory requirement for establishing and continuing any business relationship with ABDL.

## **3. GUIDING PRINCIPLES**

This Code is founded on globally recognized standards and frameworks, including but not limited to:

- The United Nations Global Compact (UNGC) Principles
- The ILO Core Conventions on Labour Standards
- Relevant Indian laws, such as the Factories Act, 1948, Environment (Protection) Act, 1986, Companies Act, 2013, BRSR framework etc.,

## **4. ETHICAL BUSINESS CONDUCT**

Suppliers shall conduct business with integrity, transparency, and fairness and shall:

- Comply with all applicable laws and regulations, including anti-bribery and anti-corruption laws.
- Not offer, accept or solicit bribes, kickbacks, improper payments, or undue advantages.
- Avoid conflicts of interest and disclose any actual or potential conflicts to ABDL.
- Not offer gifts, hospitality, or benefits to improperly influence business decisions.
- Maintain accurate, complete, and auditable business records.
- Protect ABDL’s confidential information, intellectual property and proprietary data.
- Refrain from anti-competitive, fraudulent, or misleading business practices.
- Not subcontract ABDL-related work without prior written approval from ABDL.
- Not represent or use ABDL’s brand, name, or logo without authorization.

## **5. LABOUR AND HUMAN RIGHTS**

Suppliers shall respect internationally accepted human rights standards and applicable labour laws and shall:

- Prohibit child labour, forced labour, bonded labour, or human trafficking and comply with the Company’s Human Rights Policy and all applicable local, state and national laws and international standards regarding human rights.
- Employ workers based on merit without discrimination on the basis of gender, caste, religion, age, disability, sexual orientation, nationality, or any protected characteristic.
- Respect freedom of association and the right to collective bargaining, in line with law.
- Provide fair wages, statutory benefits, leaves and working hours as per applicable laws.
- Maintain a workplace free from harassment, abuse, or intimidation.

- Establish a grievance mechanism allowing workers to raise concerns without fear of retaliation.

## **6. OCCUPATIONAL HEALTH AND SAFETY (OHS)**

Suppliers shall provide a safe and healthy workplace and shall:

- Comply with applicable OHS laws and recognized standards (including ISO 45001, where applicable).
- Identify and control workplace hazards and ensure safe machinery and infrastructure.
- Provide appropriate PPE, safety training, and emergency preparedness measures.
- Ensure the same safety standards for permanent, temporary, and contract workers.
- Promote both physical and mental well-being of employees.
- Monitor and continuously improve OHS performance through measurable indicators.
- Consult workers and their representatives on OHS decisions and improvement plans.

## **7. ENVIRONMENTAL RESPONSIBILITY**

Suppliers shall manage their environmental impacts responsibly and shall:

- Comply with applicable environmental laws, consents, and standards.
- Implement environmental management systems aligned with ISO 14001:2015.
- Implement measures to reduce emissions, effluents, waste, and resource consumption.
- Manage hazardous materials and waste safely and legally.
- Promote energy efficiency, water conservation, and circular economy practices.
- Avoid sourcing materials from ecologically sensitive or deforestation-prone areas.
- Maintain environmental records and support audits when required.
- Increase use of recycled or third-party verified raw materials (e.g., FSC-certified).
- Have their own sustainable procurement policy for their own suppliers.
- Report environmental data transparently, conduct internal audits, and submit the findings and plans accordingly.

## **8. PRODUCT QUALITY AND RESPONSIBLE SOURCING**

Suppliers must:

- Meet agreed quality specifications and applicable product safety standards.
- Avoid counterfeit or substandard materials.
- Ensure traceability of key raw materials, including grains, ENA, and packaging inputs.
- Adopt ethical sourcing practices for minerals, metals, and electronics components.
- Implement quality management and continuous improvement programs.

## **9. DATA PRIVACY AND CYBERSECURITY**

Suppliers handling ABDL data shall:

- Comply with India's Digital Personal Data Protection (DPDP) Act, 2023 and IT Act, 2000.
- Ensure appropriate cybersecurity controls aligned with CERT-In guidelines.
- Prevent unauthorized access, disclosure, or loss of data.
- Report any data breach or security incident to ABDL without undue delay.
- Ensure transparency in the use of Artificial Intelligence and automated systems.

## **10. SUPPLY CHAIN SUSTAINABILITY AND TRACEABILITY**

ABDL encourages suppliers to carry out responsible procurement that minimizes environmental and social risks. Suppliers shall:

- Monitor and disclose ESG performance across their supply chain.
- Implement audit and due diligence for human rights and ESG compliance of subcontractors.
- Support traceability and responsible sourcing of raw materials.
- Encourage circular economy through reuse, remanufacturing, and recycling initiatives.
- Align supply chain practices with ABDL's sustainability goals.

## **11. SUPPLIER ESG ASSESSMENT AND MONITORING**

ABDL expects its suppliers to uphold strong ESG practices within their own operations. Suppliers are encouraged to:

- Maintain internal processes to review their environmental, social, and governance performance on a regular basis.
- Keep relevant ESG-related documents and records updated and share them with ABDL whenever required to understand supplier practices.
- Strengthen their internal controls and management systems wherever they identify gaps through their own reviews.
- Ensure that their operations comply with applicable laws and responsible business standards.
- Provide necessary information or clarifications during supplier interactions to demonstrate responsible and ethical operational practices.

## **12. REPORTING AND WHISTLEBLOWING**

Suppliers and their workers can confidentially report violations or unethical behavior through ABDL's Grievance Redressal Mechanism. In addition, concerns may be escalated at the following address:

To: Vigilance Officer / Chairman of the Audit Committee

C/o Company Secretary

Address: Allied Blenders and Distillers Limited. 394-C, Lamington Chambers, Lamington Road, Mumbai – 400004

Reports may be submitted anonymously. ABDL ensures that all complaints will be handled confidentially and that no worker or supplier representative will face retaliation for raising concerns in good faith.

## **13. MONITORING AND REPORTING**

ABDL may conduct periodic assessments, audits, and performance reviews to assess supplier compliance with regulatory requirements, ABDL's sustainability standards, industry best practices, and environmental and safety norms. This process supports risk mitigation, performance improvement, and alignment with ABDL's sustainability objectives.

## **14. GOVERNANCE**

This policy is approved by the Head of Supply Chain & Procurement of ABDL. The Procurement and Supply Chain teams are jointly responsible for implementation, monitoring and periodic review of the policy, to ensure its relevance and alignment with international best practices. Updates will be made as necessary to enhance our supply chain practices.