



PARAS CODE OF CONDUCT FOR RESPONSIBLE SOURCING OF OIL & FATS

PREAMBLE & CORPORATE PURPOSE

At PARAS, we are committed to manufacturing high-quality plant-based oils and fats while upholding the highest standards of corporate ethics, environmental sustainability and respect for human rights. We recognize that responsible sourcing is fundamental to long-term business success is built on ethical sourcing, sustainable supply chains, regulatory compliance and maintaining the trust of our customers, suppliers, employees and other stakeholders.

We do the right thing, the right way, every time acting with integrity, complying with the law and earning trust through ethical business conduct.

Sustainability, environmental responsibility and ethical business practices are integral to everything we do. These principles support our purpose of “Making a Better World” and our vision of being the preferred partner for plant-based oil and fat solutions. We believe that responsible sourcing is essential to creating lasting value for our customers, suppliers, employees, business partners, communities and the environment.

This Code of Conduct for Responsible Sourcing of Oils and Fats reflects our values and establishes the standards and expectations that guide our suppliers in how to interact with stakeholders, make the right decisions and remain true to PARAS’s ethical and business commitments. It outlines PARAS’s core sustainability standards for suppliers of raw materials and the expectations for their management systems. By adopting this Code, PARAS strives to identify, prevent and address actual or potential negative impacts on human rights and the environment within its supply chains, promoting ethical business practices and a sustainable future.

Our Code of Conduct guides PARAS in achieving its purpose through shared values. It represents our identity and daily actions. This Code helps us uphold our principles and create a positive impact on our people, customers, partners and communities. We work with integrity and build trust by always choosing the right path.

SCOPE AND APPLICABILITY

This Code defines the baseline expectations for PARAS global supply network. The policies outlined herein cover all direct and indirect suppliers involved in the provision of plant-based oil solutions. This included but not limited to Crude Palm Kernel Oil (CPKO), Palm Kernel Oil (PKO), Crude Coconut Oil (CCNO) and Crude Palm Oil (CPO) and their derivatives. Suppliers are expected to integrate these requirements into their own business practices and extend them throughout their entire supply network, tracing compliance directly back to the primary producer.

GOVERNANCE FRAMEWORK, ACCOUNTABILITY AND IMPLEMENTATION

At PARAS, sustainability is not just a practice it is a core part of our operational culture. We champion responsible growth by embedding eco-conscious principles across every stage of our value chain. An internal Sustainability Committee has been established to monitor compliance with this Code, review supplier practices, drive continuous improvement in sustainable sourcing, production and are responsible for driving PARAS’s sustainability strategy in line with the company’s purpose and aspirations and across PARAS’s sustainability priorities climate, biodiversity, people and governance. PARAS is committed to creating meaningful impact across its entire operating model from responsibly sourcing raw materials to processing them at global facilities and delivering sustainable, high-quality solutions to customers worldwide and we ensure that every action contributes to a greener, more resilient future.

In line with this commitment, PARAS focuses on the following key areas to strengthen its sustainability governance and implementation:

- **Supplier Engagement and Capacity Building**

PARAS promotes supplier awareness and capacity building through training programs and collaborative initiatives that strengthen understanding of sustainability principles, ethical practices and environmental stewardship.



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- **Risk Assessment and Due Diligence**

A structured risk assessment process is in place to identify, evaluate and mitigate potential environmental, social and governance risks across the supply chain.

- **Transparency and Reporting**

PARAS ensures transparency through periodic reporting and disclosure of sustainability performance, enabling stakeholders to track progress and hold the company accountable to its commitments.

- **Grievance and Remediation Mechanism**

A grievance mechanism allows suppliers and stakeholders to raise concerns related to sustainability or ethical practices, ensuring fair investigation and timely remediation.

VERIFICATION, COMPLIANCE AND REPORTING MECHANISM

Supplier Commitment - PARAS expects all suppliers within scope to sign this Code and work toward full compliance with applicable national and international laws, regulations and internationally recognized human-rights standards. It is mandatory for suppliers to sign or provide an equivalent document prior to any supplier approval process.

Documentation and Verification - Suppliers must maintain documentation demonstrating actions taken toward compliance with the requirements of this Code. Such documentation shall be made available to PARAS upon written request via email, through the Supplier Information Management (SIM) system, or other locally available alternatives and should be accessible from the moment of signature. PARAS reserves the right to conduct on-site assessments of suppliers and their supply chains, including through external third-party assessors.

Collaboration and Continuous Improvement - PARAS expects suppliers to work collaboratively with the company and focus on continuous improvement. Suppliers must cooperate with PARAS in connection with risk and impact assessments, reporting, monitoring, stakeholder engagement and grievance mechanisms and must implement steps to mitigate any identified risks.

Non-Compliance and Remediation - Should a supplier fail to demonstrate commitment to meeting the requirements of this Code, PARAS will, through dialogue and cooperation, seek to resolve the situation. As a last resort, PARAS reserves the right to terminate the business relationship.

Supplier Engagement and Support - Regular supplier-engagement programs covering human-rights, environmental and governance topics will be conducted to reinforce Code compliance expectations. PARAS may distribute tools and resources such as guidelines and checklists to help suppliers demonstrate their commitment to meeting the requirements of the Code.

Communication and Clarifications - Any concerns or requests for clarification should be directed to the relevant local PARAS contact.

REPORTING OF MISCONDUCT

Raising Concerns - If a supplier, employee, or any external stakeholder has a concern or identifies a material violation of laws, legal requirements, or this Code, the matter should be reported to PARAS either personally or anonymously. Anyone who finds it difficult to raise an issue directly should use PARAS's Grievance Management Procedure (GMP), which includes a whistle-blower service.

Whistle-blower Service - The whistle-blower service may be used anonymously to report any suspicions of misconduct. Any verified misconduct by a supply-chain partner against this Code will be addressed at the parent-company or group level.

Investigation and Corrective Action - PARAS takes all reports of possible misconduct seriously and will investigate each case before determining whether the Code or the law has been violated. Corrective actions or remediation procedures will be implemented as necessary.

Protection Against Retaliation - Anyone can report concerns without fear of reprisal. PARAS ensures confidentiality and anonymity throughout the process. Any form of retaliation against a stakeholder who raises an issue constitutes a violation of this Code.



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PARAS'S ETHICAL STANDARDS AND POLICY ARE OUTLINED IN

At PARAS business conduct is guided by integrity, fairness and transparency. We are committed to upholding the highest ethical standards in every aspect of our operations from how we compete in the marketplace to how we comply with laws and manage financial responsibilities.

PARAS guiding principles are:

1. Ethical Business Conduct and Compliance with laws
2. Respect for Human Rights and Fair Labour Practices
3. Commitment to Health and Safety
4. Environmental Responsibility
5. Confidentiality and Conflict of Interest

1. Ethical Business Conduct and Compliance

At our Company, we are committed to conducting business ethically, responsibly and in full compliance with all applicable laws, regulations and internal policies. Integrity is the foundation of our operations and guides every decision, action and business relationship. We seek business relationships based on trust, transparency and mutual accountability.

PARAS Commitments are-

1.1 Compliance with Laws and Regulations

As a responsible company, PARAS comply with all applicable laws, regulations, industry standards and regulatory requirements in every jurisdiction where we operate. We expect our global Supplier Partners to share our commitment to following the law.

Supplier are expected to know and follow the laws that apply to them and their business and to treat legal requirements as a minimum standard rather than the ceiling. They must also alert PARAS to any material issues with the goods and services they supply especially those related to health and safety issues, since this proactive communication helps PARAS remain aligned with global regulations.

1.2 Integrity in Business Practices & Fair Competition

We conduct business honestly, transparently and in good faith. Suppliers must not engage in any illegal or anti-competitive practices, such as price manipulation and shall comply with all antitrust and competition law provisions. All transactions, communications and business records must be accurate, complete and truthful. We do not engage in deceptive, misleading, or fraudulent practices. We work with Supplier Partners who share our desire to build productive business relationships. This requires honest

communications, mutual respect and delivering on commitments.

We compete fairly and ethically in the marketplace and comply with all applicable competition and antitrust laws. We do not engage in price-fixing, bid-rigging, market allocation, or the inappropriate exchange of commercially sensitive information with competitors.

1.3 Anti-Bribery and Anti-Corruption

Suppliers should comply with all anti-bribery, anti-corruption and anti-kickback laws where they operate. PARAS suppliers shall not, directly or indirectly, offer, promise, give, or demand any remuneration, bribe, anything of value or other undue advantage to obtain or retain business or other improper benefit.

We maintain a zero-tolerance approach to bribery and corruption. No employee or representative may offer, provide, solicit, or accept bribes, kickbacks, facilitation payments, or any other improper advantage to influence business decisions or obtain undue benefits.

1.4 Anti-Money Laundering

All financial transactions with PARAS must comply fully with applicable Anti-Money Laundering (AML) laws and regulations. Business partners shall under no circumstances involve PARAS or be complicit in any money-laundering activities. Suppliers are required to adhere to all relevant restrictions wherever they conduct business, including trade and economic sanctions, anti-money laundering laws, customs and export control regulations and laws governing exports, re-exports and imports, as well as anti-boycott laws where applicable.

In addition, suppliers must comply with all local and international laws governing their operations. All financial transactions, invoices and records must be accurate, transparent and compliant with anti-money laundering and tax regulations. The use of illicit, unrecorded, or misrepresented funds is strictly prohibited under any circumstances.

1.5 Conflicts of Interest

Employees must avoid situations where personal interests could conflict, or appear to conflict, with the interests of the Company. Any actual, potential, or perceived conflict of interest must be promptly disclosed and managed appropriately.

1.6 Responsible Trade and Taxation

Suppliers must comply with all applicable import, export and tax laws and regulations, including those covering rules of origin, customs classification, customs valuation, export controls,



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restricted-party screening, embargoes and sanctions.

1.7 Confidentiality & Data Privacy

Suppliers should handle confidential information about PARAS, including its intellectual property, trade secrets and financial information and personal information about PARAS's employees, business partners and consumers, in accordance with applicable laws and contractual obligations.

2. RESPECT FOR HUMAN RIGHTS AND FAIR LABOUR PRACTICES

At our Company, We achieve our goals through our people. We provide a safe workplace and value the unique contributions of our global team, enabling those who support PARAS's goals to achieve their own individual potential. We are committed to respecting the human rights and promoting internationally recognized human rights and maintaining fair, safe and inclusive labour practices throughout our operations and business relationships. We believe that every individual must be treated with dignity, fairness and respect, regardless of their role, background or location.

We strive to create a workplace where human rights are protected, diversity is valued and all employees have the opportunity to work in an environment free from discrimination, harassment, exploitation and abuse.

The Requirements for supplier regarding human right as follow –

2.1 Prohibition of Forced Labour - All forms of forced, bonded, indentured, compulsory, prison or trafficked labour are strictly prohibited. The retention of personal documents, passports, identity papers, or work permits as a condition of employment is not permitted.

2.2 Prevention of Child Labour - Child labour is strictly prohibited. Children must be protected from any form of physical, emotional, sexual, or economic exploitation that may interfere with their education, health, safety, or development.

- The minimum age for employment shall not be lower than the age for completion of compulsory education and, in any case, not less than 15 years, except where local law permits employment from the age of 14.
- Young workers may only perform work permitted under applicable laws and must not be exposed to hazardous conditions or

activities that could jeopardize their health, safety, or development.

- Light work may only be performed by children of legally permitted age and in accordance with local legal requirements.

Freedom of Association and Collective Bargaining are respected including social dialogue in accordance with applicable national laws and internationally recognized labour standards. Workers shall be free to form, join or refrain from joining trade unions or other representative organizations without fear of intimidation, discrimination, harassment or retaliation.

2.3 Equal Opportunity and Non-Discrimination

All workers must be treated with dignity, fairness and respect. Discrimination based on race, colour, religion, belief, ethnic or social origin, nationality, language, age, disability, gender, gender identity, sexual orientation, marital status, political opinion, trade union membership, pregnancy, HIV status, genetic characteristics, property, birth, or any other legally protected status will not be tolerated and strictly prohibited.

2.4 Prevention of Harassment and Abuse

We are committed to maintaining a workplace free from harassment, intimidation, abuse, violence and any form of degrading treatment. Workers shall be protected from physical, verbal, psychological, sexual, or other forms of harassment, coercion, threats or abuse.

2.5 Working Hours and Leave

Working hours, rest periods, overtime and leave entitlements shall comply with applicable laws, collective bargaining agreements and internationally recognized labour standards. Overtime shall be voluntary, limited and compensated in accordance with applicable legal requirements or collective agreements, whichever provides greater protection to workers.

2.6 Fair Wages and Benefits

Workers shall receive wages, benefits and compensation that meet or exceed applicable legal requirements, industry standards or collective bargaining agreements, whichever is higher. Employees shall be paid on time and in full through transparent and understandable payment practices Without unlawful deductions or withholding of wages.

2.7 Privacy and Protection of Personal Data

The privacy and personal data of all workers are respected and protected. Personal information shall be collected, processed, stored and used only for legitimate business purposes and in



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accordance with applicable data protection and privacy laws.

2.8 Worker Accommodation

Where accommodation is provided, workers shall be offered safe, clean and dignified living conditions. Housing facilities shall provide adequate hygiene standards, sufficient living space, appropriate privacy, security and unrestricted freedom of movement. Accommodation arrangements shall respect the rights, dignity and well-being of all occupants.

2.9 Grievance Mechanisms, Human Rights Defenders and Whistle-blower Protection

We are committed to fostering an environment where concerns can be raised openly, safely and without fear of retaliation. Suppliers are expected to establish and maintain effective grievance mechanisms that enable workers, communities, business partners and other stakeholders to report concerns, complaints, or suspected misconduct in a timely and responsible manner.

2.10.1 Accessible Grievance Mechanisms - Suppliers shall maintain transparent, fair and accessible processes through which employees and external stakeholders can raise concerns related to legal compliance, human rights, labour practices, ethical conduct or violations of this Code.

2.10.2 Confidentiality and Protection - Suppliers must ensure that any complainant is treated with appropriate sensitivity and confidentiality. The identity of individuals raising concerns shall be protected and disclosed only with their explicit consent or when required by law.

2.10.3 Non-Retaliation Commitment - Suppliers shall prohibit and not tolerate any form of retaliation, intimidation, harassment, threats, discrimination, or adverse treatment against any person who, in good faith raises a concern or grievance, Reports suspected misconduct or violations, Participates in an investigation or remediation process and Acts to protect or promote human rights.

2.10.4 Respect for Human Rights Defenders and Stakeholder Representatives - Suppliers shall respect the rights of workers, worker representatives, Indigenous Peoples and Local Communities (IPLCs), human rights defenders and other stakeholders to express concerns, advocate for their rights and engage in lawful activities without fear of abuse, coercion, intimidation, or reprisals.

2.10.5 Reporting Misconduct - Any concerns regarding actual or suspected violations of laws, regulations, human rights standards, or this Code should be reported through the appropriate reporting channels described in the "Reporting of Misconduct" section of this Code.

2.10 Mitigation and Remediation

In line with our corporate values, PARAS strictly adheres to the "cause, contribute to and directly connected to" framework for risk management and requires all suppliers to align with this standard. Where a supplier causes, contributes to, or is directly connected to any ethical or legal breach, they must implement an immediate remediation plan. Suppliers are expected to respect human rights across their operations and supply chains. They must identify, prevent and mitigate any adverse human rights impacts they may cause or contribute to and where directly connected to violations through sub-vendors or contractors, take immediate corrective actions to resolve the issue and ensure compliance.

2.11 Affected Communities and Local Rights

PARAS is committed to respect the formal and customary land rights of Indigenous Peoples and Local Communities. PARAS mandates that all suppliers must respect traditional land tenure and obtain Free, Prior and Informed Consent (FPIC) from local communities before any operational expansion or land acquisition that could impact local livelihoods, resources, or food security

2.12 Smallholder Inclusion and Support

Smallholder play a vital role in the production of raw materials and fats, yet they often face obstacles such as limited resources and a lack of training and information in meeting NDPE requirements. Through capacity building focused on best management practices, the production of plant-based oils contributes to robust incomes and livelihoods for smallholder and their families.

Suppliers are expected to work closely with smallholder to meet the commitments of this Code through guidance, capacity building and incentives. In instances where PARAS does not have a direct commercial relationship with smallholder producers, such initiatives will be undertaken in collaboration with supply chain partners.

3. COMMITMENT TO HEALTH, SAFETY AND WELL-BEING

PARAS commits to maintaining a safe, healthy and secure working environment that supports employee well-being and productivity. We strictly comply with national occupational health and safety regulations. We invest in ongoing safety training, robust emergency response protocols and health programs for our workforce. We extend this commitment to our suppliers, requiring them to provide equivalent safety standards and protective measures for their workers.



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Workers must be provided with a safe, healthy and hygienic working environment. Appropriate measures shall be taken to identify, assess and control workplace risks and to prevent accidents, injuries and occupational illnesses.

This commitment requires us to:

- Comply with all applicable health and safety laws and regulations.
- Adhere to our own safety standards and requirements, which often exceed legal obligations.
- Continuously improve safety performance by learning from experiences and best practices both within and outside the organization.
- Set ambitious safety objectives that drive ongoing improvement and progress.
- Recognize and reward individuals who contribute to enhancing safety processes and practices.
- Foster a strong safety culture by ensuring that all work is performed safely, regardless of urgency or operational demands.

4. ENVIRONMENTAL RESPONSIBILITY

Our Vision - PARAS is committed to protecting the environment and enhancing the well-being of the communities in which we operate. We strive for continuous improvement in environmental performance across all our operations through responsible and sustainable business practices.

Our Commitment - We are dedicated to minimizing our environmental impact by implementing innovative and sustainable solutions. We support initiatives that promote environmental stewardship, conserve natural resources, reduce emissions and contribute to addressing climate change.

Suppliers are responsible for protecting the environment in which they operate –

4.1 Climate Change and Energy Management

PARAS is committed to reducing the environmental impact of its operations and value chain by supporting climate change mitigation and adaptation efforts. PARAS expects to its Suppliers that they manage and reduce greenhouse gas (GHG) emissions, improve energy efficiency and promote the responsible use of natural resources.

PARAS expects its suppliers strictly comply with all applicable laws and regulations related to climate change, energy use and greenhouse gas (GHG) emissions.

Supplier shall Identify, monitor and work to reduce GHG arising from their operations and supply chains.

Supplier shall Improve energy efficiency through the implementation of effective management practices and technologies.

Supplier shall Minimize the use of fossil fuels and, where feasible, increase the use of renewable and low-carbon energy sources.

Supplier shall Support initiatives that enhance climate resilience and contribute to a sustainable, low-carbon future.

4.2 Pollution Prevention and Resource Efficiency

PARAS expects its suppliers to minimize their environmental footprint by adopting sustainable and resource-efficient operating practices.

Suppliers must ensure the proper use and application of agrochemicals to eliminate or minimize any potential harm to the environment or human health.

Only agrochemicals legally approved for use in the respective country shall be used, unless their use is further restricted by a specific agreement or as determined with PARAS.

Suppliers are expected to proactively prevent incidents and emergency situations related to the use of agrochemicals, SoC (Substance of Concern) and SVHC (Substance of Very High Concern) and to control and limit any impact these may have on the environment and surrounding communities.

Suppliers shall ensure the safe handling, storage, use, transportation and disposal of chemicals, agrochemicals and hazardous substances. Only substances that are legally approved and permitted for use within the relevant jurisdiction shall be utilized.

Suppliers shall work to optimize the use of natural resources, including water and energy and continuously seek opportunities to improve resource efficiency and reduce environmental impacts across their operations and value chains.

4.3 Biodiversity and Ecosystem Protection

PARAS recognizes the importance of protecting biodiversity, conserving natural habitats and maintaining healthy ecosystems. Suppliers are expected to operate in a manner that avoids or minimizes adverse impacts on biodiversity and ecological resources.

All oils, fats and raw material supplied to PARAS must comply with deforestation- and conversion-free requirements in accordance with all relevant applicable laws, land-use rights and environmental protection regulations.



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Furthermore, suppliers must safeguard local Biodiversity. Operations must protect rare, threatened and endangered species, preserve critical wildlife habitats and strictly ensure that sourcing practices do not cause environmental harm or biodiversity loss.

PARAS is committed to preventing the deforestation and degradation of natural ecosystems throughout its value chain. Suppliers must ensure that their operations do not compromise the ecological integrity of primary forests, agroforestry systems and protected areas (including IUCN categories and UNESCO World Heritage Sites).

Development or degradation on High Conservation Value (HCV) lands, High Carbon Stock (HCS) Forests, Savannas, Wetlands and Peatlands (regardless of depth) is strictly prohibited. Furthermore, suppliers must protect and maintain riparian buffers adjacent to aquatic ecosystems in strict compliance with applicable laws.

Suppliers doing business with PARAS must strictly implement and enforce a No-Burning policy for all land clearing, preparation and agricultural operations. Unsustainable practices that lead to land degradation, desertification, soil sealing, or negative impacts on water and soil quality are strictly prohibited.

Suppliers are required to establish and maintain ecological buffer zones around bodies of water and between production fields and High Conservation Value (HCV) lands. Additionally, suppliers must take proactive measures to prevent habitat loss and mitigate negative impacts on wildlife, especially rare, threatened and endangered species, while ensuring precautions are taken against the introduction of invasive alien species.

2.4 Environmental Permits and Compliance

PARAS requires suppliers to conduct their operations in full compliance with applicable

environmental laws, regulations, permits, licenses and other legal requirements.

Suppliers shall operate in accordance with the conditions and requirements specified in such permits and authorizations and maintain accurate records demonstrating compliance with environmental obligations.

5. CONFIDENTIALITY AND CONFLICT OF INTEREST

PARAS requires all its suppliers and business partners to maintain strict confidentiality regarding all non-public information shared during the course of business.

Suppliers shall protect and safeguard PARAS's proprietary data, including but not limited to commercial contracts, pricing structures, technical specifications, volume estimates and procurement strategies. Confidential information must not be disclosed to any third party without explicit prior written consent from PARAS and it must be used solely for the purpose of fulfilling business obligations with the company. This obligation of confidentiality shall continue even after the expiration or termination of the business relationship.

Suppliers must conduct business with PARAS with complete transparency and integrity, free from any personal or conflicting interests. A conflict of interest arises when a supplier's employee or representative has a personal, financial, or family relationship with a PARAS employee who can influence procurement decisions, pricing, or contract awards.

Suppliers are strictly required to disclose any potential, actual or perceived conflicts of interest to PARAS management immediately before entering into contracts or participating in tenders. Suppliers shall ensure that no personal relationship or financial incentive is used to influence professional business judgments or secure unfair business advantages.
