



Responsible Sourcing Policy

CCL PRODUCTS (INDIA) LIMITED

Overview

CCL Products (India) Limited (herein after referred to as “the Company”) is committed to upholding strong social, ethical, and environmental standards across its operations and supply chain in every market in which it operates.

The Company acknowledges that every worker supplying goods or services deserves the right to live and work with dignity and in a safe workplace. Moreover, the Company recognizes that when employees are valued, work in favorable conditions, and receive fair compensation, both they and their organizations exhibit enhanced commitment and productivity.

The Company has therefore developed a Responsible Sourcing Policy (RSP) which defines both its minimum standards and the basic principles of cooperation that are expected from all our suppliers and business partners.

Due to the complex nature of the global supply chain, it is not feasible for the Company to monitor or control the working conditions of every individual involved in its supply chain. Nevertheless, it is committed to implementing responsible sourcing practices in all stages of its supply chain.

The Company recognizes that local socio-economic and cultural constraints might apply to the implementation of this policy and is prepared to work collaboratively with all suppliers to achieve compliance over a reasonable time frame.

The principles set out in this policy clearly require all its contracted suppliers – i.e., those with direct contract for goods or services – to ensure their facilities meet the standards defined in this policy and apply the same principles within their own supply chain

This policy constitutes minimum standards expected from its suppliers but does not limit them to go beyond these standards. Suppliers applying this policy are expected to comply with national and other applicable local or international laws and, where the provisions of the law and this policy address the same subject, whichever offers greater protection to the workers.

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The Company is committed to implementing this policy throughout the global supply chain as it works towards meeting its target to sustainably source globally critical products and hence, it requires the support of all its suppliers to achieve this goal.

Responsible Sourcing Policy

This policy defines both the Company's minimum standards and the basic principles of co-operation required from all suppliers and business partners. The policy requirements are based on core International Labour Organization (ILO) conventions, the Ethical Trading Initiative (ETI) base code, and the UN Guiding Principles on Business and Human Rights.

1.1 Employment:

1. There are no trafficked individuals working in any part of the supply chain who have been recruited, transported, transferred, harbored or received for the purposes of exploitation.
2. There is no forced, bonded, indentured, or involuntary prison labor.
3. Workers are not required to pay fees, either directly or indirectly, to obtain work, or lodge 'deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

1.2 Freedom of association and Collective Bargaining:

4. Workers, without distinction, have the right to join or form trade unions or other comparable legal organizations of their own choosing and to collectively make representations to, or enter negotiations over employment issues with their employer.
5. The employer adopts an open attitude towards the activities of both trade unions and workers' organizations.
6. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
7. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

1.3 Working conditions.

8. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry, any specific hazards, and legal requirements in line with internationally recognized certification and standards (such as the Occupational Health and Safety Assessment Series OHSAS 18001 or the International Labour Office ILO-OSH 2001 system).

9. A record of health and safety incidents (accidents and injuries) shall be maintained, with an action plan to improve performance by minimizing the causes of hazards in the working environment.

10. Workers receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

11. Access is provided to clean toilet facilities, potable water, and sanitary food storage.

12. Responsibility for health and safety is assigned to a senior management representative.

13. Facilities will undergo an environmental and safety risk assessment and have all required documentation and permits regarding structural, electrical and fire safety.

1.4 Child labor

14. Suppliers may not employ workers under the age of 15 (14 in certain developing countries as designated by ILO conventions).

15. Suppliers must maintain formal documentation that verifies the age of each worker.

16. Suppliers must comply with all relevant child labor laws.

17. Suppliers shall contribute to programs which provide for the transition of child labor to education or support the Company's efforts to do so.

18. Young people under 18 shall not be employed at night in hazardous conditions, and suppliers must comply with all international, national, and local laws regulating young workers, including educational opportunities.

1.5 Fair wages

19. Wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher.

In any event wages should always be enough to meet basic needs and to provide some discretionary income.

20. Overtime must be paid at a premium rate, at a minimum compliant with national legislation.

21. Wages shall be paid directly to the workers in the form of cash or cheque or into a nominated bank account, at the agreed intervals and in full.

22. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and provided with wage slips including the particulars of their wages for the pay period concerned each time that they are paid.

23. Deductions from wages as a disciplinary measure shall not be permitted, nor shall deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded.

1.6 Working hours and annual leave

24. Working hours must comply with national laws and industry standards.

25. Workers shall not be required to work in excess of a basic 48 hours per week and shall be provided with at least one day off for every seven-day period on average.

26. Overtime must be voluntary, must not average more than 12 hours per week, and must not be undertaken on a regular basis.

27. Workers may refuse to work overtime without any disciplinary action being taken against them.

28. Reasonable annual leave must be afforded to each employee, based on a clear, formal policy.

1.7 Discrimination

29. Suppliers will fully comply with local laws regarding equality of employment opportunities.

30. Subject to local law, suppliers will practice no discrimination in hiring, compensation, training, promotion, termination, or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

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31. If the supplier feels that cultural or structural discrimination exists that is beyond its ability to control, then this should be recorded and reported to the Company. A collaborative approach will be taken to resolve the issue in a manner that is sensitive to the cultural and social context.

1.8 Regular employment

32. Work performed must be on the basis of a recognized employment relationship established through national law and practice.

33. Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labor-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

34. Migrant, contract, part-time and home-workers must receive the same rights, benefits and opportunities for advancement as other workers performing similar activities.

1.9 Humane treatment

35. Physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation shall be prohibited.

36. Disciplinary actions must be fair, proportionate, and fully compliant with local laws.

37. All disciplinary actions must be recorded.

38. Suppliers will record any incidence of harsh or inhumane treatment and develop action plans to prevent future violations.

39. Suppliers will develop a whistle-blowing policy and process for their workers.

1.10 Dormitories

40. Dormitory facilities must meet all local laws and regulations covering health, sanitation, electrical, mechanical, fire and structural safety.

41. An evacuation plan must be prominently displayed.

42. Dormitory facilities should have been designed and built for human habitation.

43. Facilities should be away from the main factory and production buildings.

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44. Charges for rent and food must be reasonable and benchmarked against local cost and wage levels.
45. Each worker must be provided with an individual sleeping area (bed or mat).
46. Sleeping quarters must be segregated by gender.
47. Workers must be provided with adequate and lockable storage space.
48. Sleeping quarters must have adequate lighting.
49. Appropriate quarters must be provided for couples who are legally married.
50. The living space per worker must be the minimum legal requirement or the local industry standard, whichever is greater.
51. Workers must be allowed to leave and enter freely during work time subject to reasonable restrictions imposed based on safety considerations.
52. Dormitory accommodation must include access to potable water.
53. Workers must be provided with adequate recreational facilities.
54. Adequate toilet and shower facilities must be provided, segregated by gender, and maintained in hygienic condition.

1.11 Ethical Corporate Practices

55. All relevant national and international legal requirements must be complied with.
56. The Company must be informed of any serious breaches of compliance or investigations by authorities into potential breaches.
57. Suppliers must not take part in:
 - Money laundering
 - Insider trading
 - Fraud, bribery and corruption and other improper payments or gifts
 - Unauthorized access to personal and business information.
58. Suppliers will adhere to the principle of free, prior, and informed consent of local and Indigenous communities where sourcing takes place, ensuring rights and access to land is not abused.

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59. Suppliers are required to act in accordance with the Prevention of Corruption Act, 1988.

1.12 Environmental Stewardship

60. Suppliers must comply with all relevant local, national, and international legal requirements regarding environmental stewardship.

61. Suppliers are required to conduct an environmental risk assessment at the facility level.

62. As appropriate to the size and complexity of the business, suppliers must be able to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance.

63. Suppliers should comply with any additional sub-policies or standards that the Company introduces to improve environmental stewardship.

64. Suppliers are encouraged to prioritize sourcing energy-efficient, low-carbon appliances and equipment while selecting products with ecolabels or equivalent sustainability certifications.

65. Suppliers are encouraged to prioritize sourcing from locations away from wildlife-protected and eco-sensitive zones to minimize environmental impact. Collaborate with suppliers, local communities, and government bodies to assess deforestation risks in the supply chain and implement corrective measures.

66. Suppliers are encouraged to collaborate with their suppliers, local communities, and government entities to assess deforestation risks in the supply chain and implement corrective measures.

67. Suppliers are encouraged to integrate industry's best practices to reduce waste and optimize resource use, actively promote sustainable behaviors, and embrace circular economy principles to ensure the efficient and responsible utilization of materials throughout the supply chain.

2. Principles of Implementation

The Company understands that improving social, ethical, and environmental standards in the supply chain is a challenging process that requires the co-operation of its employees, suppliers, and other stakeholders. The Company recognizes that compliance with the Responsible Sourcing Policy may not be immediately achievable, but it is

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committed to working in collaboration with its suppliers towards the achievement of this goal.

The principles of implementation herewith recognize this challenge and set out a process of continuous improvement with the ultimate objective of achieving compliance with the Policy.

To drive continuous improvement, the Company commits to the following principles:

- Work to fair, transparent, and mutually agreed terms and conditions.
- Make payments for services provided on time and in full.
- Work collaboratively with suppliers to improve social, ethical, and environmental standards where the Company's support is needed and is appropriate.
- Acknowledge specific national, regional, or cultural challenges.
- Protect the confidentiality of information entrusted to the Company.
- Recognize suppliers' own standards where they are comparable to the Company's standards.
- Ensure that all relevant employees are aware of the Responsible Sourcing Policy and cease trading with suppliers demonstrating persistent disregard for this Policy.
- Include transparent environmental, social, and ethical performance criteria in its supplier selection processes.
- Give appropriate consideration to the impact of ceasing trading on suppliers and the communities in which they operate.
- Integrate the UN Guiding Principles on Business and Human Rights throughout the supply chain and in its own operations.

Governance

In conjunction with the principles of implementation, the Company will:

- Allocate the resources required in order to fully implement the Policy.
- Communicate the Responsible Sourcing Policy to all relevant employees
- Assign responsibility for the implementation of this Policy to specific individuals who will provide the Board, suppliers and other stakeholders with compliance updates and implementation of performance as required.
- Provide appropriate training and key performance measures to all employees with specific sourcing responsibilities in order to enable them to support the implementation of the Policy.

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- Communicate this Policy to all suppliers and seek formal acceptance and commitment to its implementation.
- Require all suppliers to report on their level of compliance with this Policy and the corrective actions being taken towards improvement.
- Maintain an internal system to record and monitor the level of compliance to this Policy.
- Actively engage with all suppliers to support continuous improvement towards compliance with this Policy.
- Communicate annually to all the employees, suppliers and publicly, the progress towards compliance with this Policy.
- Review the Policy whenever necessary and appropriate.

The Company requires its suppliers to advise and keep itself updated on all suppliers (its tier 2 suppliers) used for the production and processing of its goods and services and, further, to commit to:

- Communicate the Policy to all employees, suppliers, sub-contractors, home workers, and temporary and contract staff engaged in their supply chain.
- Comply with this Policy, all applicable laws in the countries in which they operate and all relevant ILO conventions, UN Guiding Principles on Business and Human Rights and the Prevention of Corruption Act. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
- Establish management systems for delivering compliance with this Policy.
- Maintain records demonstrating compliance. An individual in a senior management position should be given responsibility for compliance with the Policy.
- Train relevant staff in social, ethical, environmental, and human rights standards to support compliance with this Policy.
- Allow the Company's representatives to access documentation, management, and workers to determine progress against compliance with this Policy.
- Report any serious breaches of this Policy to the relevant Company's representative.

The Company reserves the right to access supplier operations including their entire supply chain for its own auditors or third-party auditors engaged by the Company in order to assess compliance with this Policy.



Suppliers may in addition be required to comply with additional sub-policies or standards relevant to the products that the Company sources from that supplier and specific risks or issues associated.

Review and monitoring

1. Interpretation & Guidance:

If any additional guidance and/or further interpretation is required, the stakeholders can contact the Company's Sourcing Head personnel.

2. Review Timelines:

The policy will be reviewed on basis of changes in legal and market guidelines.

3. Communication of Policy:

The policy will be available on its corporate website.

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