

## Supplier Code of Conduct

### I. Overview and Purpose of Policy

Oil and Natural Gas Corporation Limited (ONGC) being the country's largest oil and natural gas producer is dedicated to upholding the highest standards of health, safety, security, and environmental sustainability. This commitment is deeply rooted in its core values of integrity, fairness, and business ethics, and is maintained throughout its entire value chain.

ONGC recognizes that its suppliers operate independently, but their business practices can impact or reflect on us. The Company encourages all suppliers to adhere to the social, ethical, and environmental standards of conduct and adopt practices aligned with preferred and favored standards. The Company actively engages with key suppliers to promote sustainability within our supply chain.

This Code embodies ONGC's commitment to internationally recognized standards, including the Core Conventions of the International Labour Organization (ILO), United Nations' Universal Declaration of Human Rights (UNDHR), SA8000 as well as other prevalent industry standards concerning environmental stewardship, labour standards, human rights, and business ethics.

### II. Applicability

This Supplier Code of Conduct is applicable to all 'Suppliers' of ONGC Limited. 'Supplier' here refers to Suppliers, service providers, traders, agents, consultants, contractors, joint venture partners, third parties including their employees, agents, and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to ONGC Limited.

### III. Policy Commitment

Adhering to the Supplier Code of Conduct, Suppliers shall:

#### ❖ Labor and Human Rights

- Comply with all applicable local, state and national laws regarding human rights.
- Comply with the Company's Human Rights Policy
- Ensure that all their employees are hired on their own free will and guarantee that all their operations are free from forced, bonded, compulsory, indentured, prison labour or any other form of compulsory labour and child labour.
- Ensure that all its employees are provided equal employment opportunities, an environment conducive to their growth, free from any form of discrimination and harassment.
- Ensure compliance with minimum working hours and minimum wages prescribed by applicable laws and regulations.
- Comply with all modern slavery and human trafficking laws.
- Ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices both internally and within their supply chains and other external business relationships.

- Ensure that employees are not charged any fees or costs for recruitment, directly or indirectly.
- Not confiscate or withhold worker identity documents or other valuable items, including work permits and travel documentation of any of its workers/ employees.

#### ❖ **Environment**

- Furnish environmental data in line with evolving regulatory requirements on value chain disclosures to ONGC.
- Abide by all existing enactments on environmental protection and rules made thereunder, regulations, notifications and bye-laws of the State or Central Government, or local authorities, as applicable.
- Provide a safe and healthy workplace for all his employees and take all reasonable steps to protect the environment and to avoid damage or nuisance to persons or to property of the public or others resulting from pollution, noise or other causes arising as consequence of his methods of operation.
- Contribute towards reduction of carbon emission, energy efficiency and reduction of Greenhouse gas emission. Towards this end Supplier shall, wherever possible, use energy efficient and durable products, reusable products without significantly affecting the intended use of goods and services.
- Orient its practices/operations to deliver the products or service that minimize the emissions and discharges of pollutants or generation of waste. Supplier shall institute waste management practices in its premises and ONGC sites, wherever it is executing a contract.
- Obtain and maintain current all environmental permits, approvals and registrations.

#### ❖ **Health and Safety**

- Prioritize occupational health and safety of the personnel employed.
- Undertake all safety precautions to prevent potential accidents to avoid/minimize any loss of life and property to have zero loss of life.
- Establish appropriate organizational structures and procedures for the effective management of health and safety risks.
- Comply with relevant provisions of applicable laws pertaining to the safety. In case of any discrepancy between statutory requirement and ONGC's Health & Safety Policy/rules in a Contract, the latter shall be binding on the Contractor unless the statutory provisions are more stringent.
- Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

#### ❖ **Business Integrity and Ethics**

- Refrain from any type of integrity violations including but not limited to corrupt, fraudulent, collusive, coercive, anti-competitive or obstructive practices.
- Abide by Code of Integrity for Public Procurement (CIPP) provided in Works and Procurement Policy (Rev10, March 2024) and Integrity Pact, if signed under a particular contract.
- Disclose to ONGC information regarding potential conflict of interest relating to their activities as ONGC's supplier, including disclosure of any interest that an ONGC employee may have in its Business.
- Respect intellectual property of others including ONGC.

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- Protect all confidential information provided by ONGC and its business partners.
- Refrain from any anti-competitive practices and adhere to applicable Laws in this regard.
- Adhere to all international trade regulations and export control regulations.
- Refrain from any money laundering activities and comply with Laws and regulations in this regard.

❖ **Local Procurement**

- Adhere to the guidelines and policies set by the Ministry of Petroleum and Natural Gas, Government of India, in its procurement practices.
- Support Government of India's vision of increasing local content in goods and services while implementing oil and gas projects in India through the Make in India initiative.
- Engage with local producers and providers of goods and services and integrate local procurement requirements while awarding contracts in line with Make in India.
- Monitor and report on local content procurement regularly, such as through sustainability reports and declarations to the government.

**IV. Grievance Redressal Mechanism**

Any questions/grievances related to this Code of Conduct can be addressed to the ED (PMC) at the email.

**V. Compliance and Assurance**

- To assure compliance with ONGC's Supplier Code of Conduct, Suppliers shall keep record of all relevant documentation, and provide them to ONGC upon request.
- To ensure compliance of Suppliers, ONGC reserves the right to audit and inspect the operations/facilities/site of Supplier at its own cost and upon reasonable notice, with or without the support of the Third party.
- If the result of such audit or inspection showcase non-compliance with the Code, the Supplier shall be directed by ONGC to take necessary mitigating actions in a timely manner.
- If the Supplier fails to comply with this Code, then ONGC may act against the Supplier including suspension or termination of activities as ONGC's supplier.

**VI. Capacity Building**

ONGC shall ensure regular trainings and awareness workshops for all its Suppliers on implementation and monitoring of the Supplier Code of Conduct.

**Arun Kumar Singh**  
Chairman & CEO, ONGC

Dated : 25<sup>th</sup> October, 2024