

	<b>Manorama Industries Limited</b>	<b>Document Number</b>	MI/POL/81/01
	<b>INDIA</b>	<b>Document Issue Date</b>	01.08.2024
	<b>Sustainable Procurement Policy</b>	<b>Document Revision Date</b>	29.11.2025
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## 1. Purpose

This policy exists to ensure that Manorama Industries Limited integrates sustainability into every aspect of its procurement process. Its objective is to embed environmental protection, social responsibility, and economic viability into the sourcing of raw materials such as Sal, Shea, Mango kernels, Palm oil, and other forest and agricultural produce. The policy aims to achieve responsible and ethical sourcing that:

- Protects biodiversity and prevents deforestation
- Reduces the carbon footprint of the supply chain
- Ensures fair Labor practices, human rights protection, and safe working conditions
- Empowers forest-dwelling tribal communities, especially women
- Promotes fair trade and community development
- Ensures long-term sustainable resource management
- Strengthens supply chain resilience through innovation, risk mitigation, and long-term supplier partnerships
- Enhances transparency and traceability across the supply chain.

## 2. Scope

This Sustainable Procurement Policy applies to all internal departments and teams at Manorama Industries Limited that are involved in purchasing, sourcing, supply chain operations, community engagement, sustainability initiatives, and certification processes. It covers the procurement, sustainability/CSR, quality, certification, logistics, production, and operational teams, as well as the management and the Sustainability Steering Committee responsible for governance and monitoring.

The policy also applies to all external stakeholders engaged in the procurement and supply chain of Sal, Shea, Mango kernels, Palm oil, and other raw materials. This includes suppliers, vendors, contractors, traders, transporters, aggregators, and service providers connected to the sourcing and movement of materials. It further extends to forest collectors, tribal women’s groups, cooperatives, and smallholders involved in seed collection and harvesting activities. The policy encompasses third-party auditors, certification bodies, NGOs, community partners, and government agencies who support or verify sustainable sourcing practices.

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### 3. Definitions

- 1. Sustainable Procurement:** Procurement practices that consider environmental, social, and economic impacts.
- 2. NDPE:** No Deforestation, No Peat, No Exploitation.
- 3. RSPO:** Roundtable on Sustainable Palm Oil.
- 4. Traceability:** Ability to track the origin and movement of raw materials.
- 5. Smallholders:** Individuals or groups engaged in small-scale agricultural or forest produce collection.

### 4. Policy Statement

Manorama Industries Limited is committed to conducting all procurement activities in a responsible, ethical, and sustainable manner. The organization prioritizes sourcing practices that protect biodiversity, prevent deforestation, reduce greenhouse gas emissions, and promote long-term conservation of natural resources such as Sal, Shea, and Mango seeds. The company upholds the highest standards of social responsibility by ensuring the prohibition of child labor, forced labor, discrimination, and unsafe working conditions across its supply chain. It is committed to supporting forest-dependent communities, tribal women, smallholders, and cooperatives by promoting fair trade principles, providing fair compensation, and encouraging community development.

The organization further commits to strengthening economic resilience by identifying and mitigating supply chain risks, fostering innovation, and establishing long-term, mutually beneficial partnerships with suppliers who share its sustainability values. Manorama Industries ensures that all suppliers adhere to responsible sourcing guidelines, implement sustainable harvesting practices, and maintain compliance with international standards such as RSPO, ISO 14001, and other relevant frameworks. The company is dedicated to achieving full traceability of key raw materials, increasing certified sustainable sourcing, and continuously improving environmental and social performance through training, audits, monitoring, and transparent reporting. Overall, these principles guide the company's effort to build a supply chain that contributes positively to ecosystems, communities, and business sustainability.

### 5. Roles and Responsibilities

#### 1. Senior Management – Mr. Gautam Pal, Whole Time Director

- Provide overall leadership and approval for the Sustainable Procurement Policy.
- Allocate resources required for implementation of sustainability objectives.
- Review sustainability performance and progress quarterly through the Steering Committee.

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- Take strategic decisions to address environmental, social, or supply chain risks.

## **2. Procurement Team - Mr. Anurag Jain, GM- Purchase & Stores, Mr. Ajay Sharma, VP – Seed Purchase**

- Integrate sustainability requirements into supplier selection, evaluation, and contracts.
- Ensure suppliers comply with environmental, social, and ethical standards.
- Support traceability initiatives for Sal, Shea, Mango, Palm oil, and other key materials.
- Identify high-risk suppliers and coordinate mitigation or corrective measures.

## **3. CSR & Sustainability Team: - CSR Committee (2025-26)**

- Engage with forest dwellers, tribal women, cooperatives, and smallholders.
- Provide capacity-building support and training on sustainable harvesting practices.
- Promote community development initiatives linked to ethical sourcing.
- Support suppliers in improving environmental and social practices.

## **4. Certification Team: - Mr. Vikas Yadav, Asst. Manager**

- Ensure compliance with all certification standards such as ISO 14001, RSPO, Fair Trade, Organic USDA-NOP, NPOP, COSMOS, FFL etc.
- Conduct regular supplier audits and assessments for sustainability compliance.
- Verify documentation, certifications, and third-party verification records.
- Ensure COAs, sustainability data, and raw material compliance meet policy requirements.

## **5. Logistics Team: - Mr. Ajay Raj Kaurav, General Manager-Logistics**

- Support collection, storage, and transportation practices aligned with sustainability guidelines.
- Optimize logistics to reduce carbon footprint and operational waste.
- Maintain traceability in all stages of the supply chain.

## **6. Suppliers, Vendors, Contractors, and Collectors**

- Follow MIL's sustainable sourcing guidelines and ethical labor practices.
- Avoid deforestation, habitat destruction, and unsafe harvesting methods.
- Provide fair wages, safe working conditions, and respect human rights.
- Implement corrective actions when non-compliances are identified.

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- Maintain transparency by sharing accurate sustainability and traceability information.

### 7. Third-Party Auditors and Certification Bodies

- Conduct independent verification of supplier compliance.
- Support MIL in validating certifications.
- Provide objective assessment and recommendations for improvement.

## 6. Key Strategies

The company conducts regular supplier assessments, including sustainability audits, risk evaluations, and performance reviews, to identify environmental and social risks such as deforestation, habitat degradation, greenhouse gas emissions, Labor violations, and non-compliance with international standards. High-risk suppliers and regions are given targeted interventions, corrective action plans, and continuous monitoring to ensure alignment with sustainability requirements. Traceability assessments are also performed to verify the origin of raw materials—especially Palm oil, Sal, Shea, and Mango seeds—ensuring they are sourced responsibly.

MIL actively collaborates with suppliers, tribal collectors, smallholder groups, cooperatives, and community organizations to promote sustainable harvesting practices and improve environmental and social outcomes. The company participates in industry platforms such as RSPO and the Global Shea Alliance, engaging in joint initiatives and multi-stakeholder dialogues to drive systemic sustainability improvements. Partnerships with NGOs, government bodies, and public-private networks further support responsible sourcing and community development. In addition, continuous training and capacity-building programs for employees, collectors, and suppliers help strengthen sustainability competencies across the supply chain.

## 7. Related Documents

The following documents, manuals, guidelines, and reference frameworks support the implementation of the Sustainable Procurement Policy and provide detailed procedures, standards, and requirements:

1. Supplier Code of Conduct
2. Responsible Sourcing Guidelines
3. Procurement SOPs
4. Supplier Audit & Assessment Forms
5. Traceability Guidelines & Material Tracking Procedures.

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6. Training Records & Capacity Building Materials
7. Annual Sustainability Report
8. Legal and Certification Frameworks aligned with the policy
  - ISO 20400 – Sustainable Procurement Guidance
  - ISO 14001 – Environmental Management Systems
  - UN Global Compact
  - OECD Due Diligence Guidance
  - ILO Conventions
  - RSPO Standards
  - Fair Trade Certification Requirements
  - NDPE Policy
  - UN Sustainable Development Goals (SDGs)

## 8. Regulatory or Legal Requirements

- ISO 20400:2017 Sustainable Procurement Guidance
- ISO 14001:2015 Environmental Management Systems
- International labor and human rights requirements under the UN Global Compact Principles.
- ILO Conventions
- RSPO (Roundtable on Sustainable Palm Oil) Principles & Criteria
- Fair Trade Certification Standards.
- Supports global sustainability frameworks (UN Sustainable Development Goals (SDGs))
- NDPE (No Deforestation, No Peat, No Exploitation) commitments

## 9. Tools and Resources

- Traceability systems and material tracking tools
- Satellite monitoring tools for monitoring and reporting system.
- Third-party audit platforms and external verification agencies.

## 10. Consequences of Non-compliance

Any violation of this policy will require the supplier or stakeholder to take immediate corrective actions and undergo additional monitoring or audits. Continued or serious non-compliance may result in warnings, suspension, or termination of the business relationship.

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Internally, employees failing to follow sustainable procurement requirements may face disciplinary actions as per company rules. These steps ensure full adherence to ethical, environmental, and social standards.

### 11.Training & Communication

- Internal meetings, email circulation, and regular supplier interactions.
- Training is required for procurement teams, key suppliers, and community collectors to ensure they understand environmental, social, and traceability requirements.

### 12. Policy Distribution Method

This policy will be distributed through internal communication channels such as email circulation, the company intranet/SAP system, and departmental meetings. It will also be shared with suppliers and external stakeholders through supplier communication letters, onboarding documents, and sustainability engagement sessions. The policy may additionally be displayed on notice boards or included in company manuals where required.

**Manorama Industries Limited**

