



# **NHAVA SHEVA FREEPORT **TERMINAL****

## **Procurement**

### **Supplier Code of Conduct**

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# Supplier Code of Conduct

## Manual Distribution

**Controlled serialized copies circulated to those listed below.**

1. HEAD-Procurement Copy no. 01
2. Auditor Copy (Retained with MR) Copy no.02

## Amendment Status

SL No	Section No	Details of Amendment	Reason for Amendment	Current Revision Status	Date of Issue and / or Revision
1	-	Creation of SCC	-	-	09-06-2026

## Purpose

This Supplier Code of Conduct (“Code”) sets out the baseline expectations for all third parties—suppliers, contractors, service providers, vendors, consultants, and business partners (collectively “Suppliers”)—engaged in delivering goods or services to Nhava Sheva Freeport Terminals Pvt Ltd (Here by referred as NSFT). The Code promotes ethical behavior, safety, environmental stewardship, legal compliance, and sustainable performance across the terminal ecosystem.

## Scope of Applicability

This Code applies to any Supplier providing, among other things:

- Cargo handling and terminal services
- Supply, maintenance, and repair of equipment (e.g., cranes, RTGs, forklifts, trailers)
- Construction, civil works, and infrastructure projects
- IT systems, automation, and communications support
- Security, housekeeping, manpower, and logistics services
- Fuel, energy, utilities, and consumables

Suppliers are responsible for ensuring that their own employees, agents, and approved subcontractors comply with this Code.

## Legal & Regulatory Compliance

Suppliers shall:

- Comply with all applicable local, National, and international laws and regulations

- Adhere to port authority requirements, terminal operating procedures, and statutory permits
- Maintain valid licenses, certifications, approvals, and registrations always
- Observe customs, maritime, labor, environmental, and occupational safety obligations

## Business Ethics & Integrity

Suppliers must operate transparently and with integrity at all times.

### Anti-Bribery & Anti-Corruption:

- Do not offer, solicit, or accept bribes, kickbacks, facilitation payments, or any improper advantage
- Comply with all applicable anti-corruption statutes and ethical standards

### Conflict of Interest:

- Disclose any actual or potential conflicts of interest promptly
- Avoid circumstances that may compromise impartial judgment or decision-making

### Fair Competition:

- Act in accordance with competition and antitrust laws
- Refrain from collusion, bid-rigging, price-fixing, or any unfair trade practices

### Posh Act:

- Maintain a zero-tolerance approach toward sexual harassment and comply with applicable laws relating to prevention, prohibition, and redressal of workplace harassment.

## Health, Safety & Occupational Wellbeing (HSE)

Safety is paramount at NSFT port and Terminal environments.

### Suppliers shall:

- Provide a safe and healthy workplace and comply with relevant HSE legislation
- Follow port/terminal safety rules, permits-to-work, and access control procedures
- Ensure personnel are trained, competent, and medically fit for assigned tasks
- Supply and enforce the use of appropriate Personal Protective Equipment (PPE)
- Report incidents, near-misses, and unsafe conditions without delay
- Maintain emergency preparedness and response plans, including drills where required

## Environmental Responsibility

Suppliers are expected to support environmentally responsible operations.

### They shall:

- Comply with environmental laws, consents, and permits
- Minimize emissions, spills, noise, and waste generation

- Handle hazardous materials safely and responsibly, with proper containment and documentation
- Prevent pollution on land and in marine environments
- Promote energy efficiency and prudent resource use
- Contribute to sustainability initiatives, including efforts to reduce carbon impact

## Labor & Human Rights

Suppliers must uphold human rights and fair labor practices as per Central and Maharashtra Govt norms.

### Employment Practices:

- Prohibit child labor, forced labor, and bonded labor
- Provide wages, benefits, and working hours in accordance with applicable law.
- Provide adequate breaks, social security, statutory benefits, weekly offs, and public holidays as mandated by law
- Provide employees with written employment contracts or appointment letters clearly stating terms and conditions of employment.
- Maintain accurate employee records and statutory registers as required by law.
- Respect freedom of association and collective bargaining rights

### Non-Discrimination & Dignity:

- Ensure equal opportunity without discrimination based on gender, caste, religion, race, age, disability, nationality, or any protected characteristic
- Maintain a workplace free from harassment, abuse, bullying, or intimidation

## Security & Access Control

Due to the critical nature of port operations, Suppliers shall:

- Comply with port security requirements, ISPS Code provisions, and site-specific access protocols
- Conduct appropriate background verification for deployed personnel
- Prevent unauthorized access to restricted areas
- Protect assets, cargo, data, and infrastructure from theft, tampering, or misuse

## Data Protection & Confidentiality

Suppliers must:

- Safeguard confidential, commercial, and operational information
- Use data only for legitimate, authorized business purposes
- Comply with applicable data privacy and cybersecurity obligations
- Protect IT systems from unauthorized access, malware, and cyber threats

## Quality & Operational Excellence

Suppliers are expected to:

- Deliver goods and services that meet agreed specifications, standards, and timelines
- Maintain quality management systems where relevant
- Pursue continuous improvement and operational efficiency
- Address deficiencies, complaints, and non-conformities promptly and effectively

## Subcontracting & Supply Chain Responsibility

- Use subcontractors only where permitted and, when required, with prior written approval
- Ensure subcontractors adhere to this Code and applicable laws
- Retain full responsibility for subcontractor performance, behavior, and compliance

## Audits, Monitoring & Right to Inspect

NSFT reserves the right to:

- Conduct audits, inspections, and assessments of Supplier operations and facilities
- Review documents evidencing compliance with this Code
- Investigate incidents, complaints, or alleged violations

Non-compliance may result in corrective actions, suspension, or termination of contracts.

## Reporting & Whistleblowing

Suppliers are encouraged to:

- Report suspected violations, unsafe practices, unethical conduct, or environmental incidents
- Cooperate fully with investigations

Reports may be submitted in good faith without fear of retaliation.

## Consequences of Non-Compliance

Failure to comply with this Code may lead to:


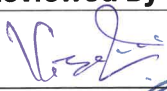
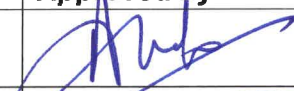
- Corrective and preventive action requirements
- Suspension or blacklisting of the Supplier
- Contract termination
- Legal or regulatory action, as applicable

## Acknowledgement & Acceptance

Suppliers must acknowledge and accept this Code as a condition of doing business. Acceptance may be evidenced through contract clauses, declarations, or written confirmation.

## Review & Updates

This Code may be reviewed and updated periodically to reflect changes in law, industry standards, operational requirements, and sustainability goals.

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