



FLAIR WRITING INDUSTRIES LIMITED

RESPONSIBLE SUPPLY CHAIN POLICY

1. Scope & Applicability

Flair Writing Industries Limited (referred to as “**Flair**”, or the “**Company**”) is committed to conducting its business in an ethical, transparent, socially responsible and legally compliant manner. We recognize that our suppliers and business partners form an integral part of our value chain and contribute significantly to our operational excellence and sustainability goals.

This Responsible Supply Chain Policy (hereinafter referred to as the “**Policy**”) applies to all suppliers, distributors, dealers, agents, vendors, contractors, service providers and other business partners (collectively referred to as “**Supply Chain Partners**”) who engage in business with Flair.

This Policy applies to all Supply Chain Partners, whether operating within India or internationally, who provide goods or services to the Company including but not limited to:

- Raw material suppliers (plastics, inks, chemicals, packaging materials, components)
- Machinery and equipment vendors
- Logistics and warehousing partners
- Contract manufacturers
- Service providers and consultants

The Policy shall be effective as of May 21, 2026, and shall remain in force until modified, replaced or terminated.

2. Purpose of the Policy

The principles of responsible business conduct extend beyond the Company and apply to all entities associated with Flair’s supply chain.

The objectives of this Policy are:

1. To define the standards of responsible and ethical conduct expected from Supply Chain Partners.
2. To promote integrity, transparency, and accountability within the supply chain.
3. To encourage environmental sustainability and social responsibility among business partners.
4. To align supply chain practices with applicable ESG principles and regulatory requirements.



For any clarification regarding this Policy, Supply Chain Partners may contact the Company Secretary & Compliance Officer of the Company.

3. Ethics & Integrity

Flair expects all Supply Chain Partners to uphold high standards of ethics and integrity in their business dealings.

(a) Regulatory Compliance

Supply Chain Partners shall conduct their business operations in full compliance with all applicable laws, rules, regulations and government notifications, including but not limited to:

- Labour laws
- Environmental laws
- Anti-corruption laws
- Health and safety regulations
- Tax and corporate governance requirements

(b) Bribery and Corruption

Flair maintains a zero-tolerance approach toward bribery and corruption.

Supply Chain Partners shall:

- Not offer, promise, give, solicit or accept bribes or any improper payments.
- Not provide gifts, entertainment or any benefit to employees or representatives of Flair with the intention to influence business decisions.
- Raise invoices strictly for goods delivered or services rendered as per contractual terms.
- Avoid false, misleading or fraudulent entries in invoices, claims or documentation.

The Company reserves the right to terminate agreements with any Supply Chain Partner found to be engaged in corrupt or unethical practices and may pursue appropriate legal remedies.

(c) Conflict of Interest

Supply Chain Partners shall promptly disclose any actual or potential conflict of interest, including situations where:

- An employee, director, or their immediate family member has a financial or personal interest in the Supply Chain Partner's business.
- There exists any relationship that may influence objective business decisions.



(d) Adherence to Code

Where a Supply Chain Partner engages subcontractors or third parties for delivering goods or services to Flair, such parties must adhere to this Policy and other applicable Company standards.

4. Labour Practices & Human Rights

Flair is committed to respecting human rights and expects its Supply Chain Partners to align with internationally recognized human rights principles.

Supply Chain Partners shall ensure:

- Equal opportunity and non-discrimination
- Respect for dignity, privacy and individual rights
- Payment of at least statutory minimum wages
- Compliance with legally prescribed working hours
- Prohibition of child labour
- Prohibition of forced, bonded or involuntary labour
- Freedom of association as per applicable laws

Workplace Health & Safety

Supply Chain Partners shall:

- Provide a safe and healthy working environment.
- Comply with occupational health and safety regulations.
- Implement appropriate safeguards for machinery and equipment.
- Ensure safe handling, storage and disposal of chemicals and hazardous materials (including inks, solvents, and industrial substances).
- Maintain emergency preparedness procedures and first aid facilities.

5. Environmental Sustainability

Flair expects its Supply Chain Partners to operate in an environmentally responsible manner.

Supply Chain Partners shall:

- Comply with applicable environmental laws and standards.
- Obtain necessary environmental permits and approvals.
- Minimize waste generation and promote recycling and resource efficiency.
- Ensure safe disposal of industrial waste, including chemical and plastic waste.
- Strive to reduce carbon footprint, emissions and water consumption.

Suppliers involved in raw materials such as plastics, chemicals, inks and packaging materials are encouraged to promote sustainable sourcing and environmentally friendly alternatives wherever feasible.



6. Compliance with the Policy

(a) Communication & Implementation

Supply Chain Partners shall:

- Communicate this Policy to their employees, subsidiaries, subcontractors and agents involved in providing goods or services to Flair.
- Ensure compliance with this Policy in addition to contractual obligations agreed with the Company.
- Establish internal systems to monitor compliance with this Policy.

(b) Monitoring & Audit

Flair reserves the right to conduct audits or assessments, with prior notice, to verify compliance with this Policy. Such reviews may include, but are not limited to:

- Human rights compliance
- Labour practices
- Environmental compliance
- ESG parameters
- Health and safety practices
- Adherence to contractual commitments

Failure to comply may result in corrective action, suspension or termination of business relationship.

7. Reporting of Violations

Supply Chain Partners are encouraged to report any suspected unethical, illegal or improper conduct involving Flair employees or other business partners through the Company's Vigil Mechanism / Whistle-Blower Policy.

All reports made in good faith will be treated confidentially. The Company will not tolerate retaliation against any person raising genuine concerns.

8. Review & Modification

This Policy shall be approved by the Board of Directors of Flair Writing Industries Limited.

The Policy shall be reviewed periodically by the management, including the Compliance Officer, to ensure continued relevance and alignment with regulatory and ESG requirements. Any amendments shall be approved by the Board of Directors.