

Supplier Code of Conduct





Message from The Director Supply Chain

As the Director of Supply Chain for Fatima Fertilizer, I am responsible for managing the integrity of our strategic supplier network, a system essential to our operational continuity and success. Given the importance of your role in providing high-quality and innovative goods and services, strict adherence to the Supplier Code of Conduct is mandatory and serves as the foundation for our partnership. This Code is the operational framework for ethical engagement, and we rely on you to ensure compliance is a top priority in your daily business. This requires always applying the more stringent standard when local laws and the Code may differ, and maintaining unwavering operational integrity with a zero-tolerance policy towards bribery, corruption, and forced labor.

We expect proactive self-monitoring and rigorous enforcement of this Code across all your employees, agents, and subcontractors. My team will consider compliance in all procurement decisions and reserves the right to monitor your operations through on-site audits. Please understand that any violation of this Code may jeopardize your business relationship with Fatima Fertilizer, up to and including the termination of our agreements. I urge you to understand these standards fully and to use our Flag-It mechanism to report any concerns. We are committed to fostering a sustainable and ethical supply chain together.

Sincerely,

Rehman Hanif

Director Supply Chain

Fatima Fertilizer Company Limited

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1. Introduction

Fatima Fertilizer Company Limited (“FATIMA”) aims to create and maintain a world class supply chain operation in collaboration with Suppliers, contractors, transporters and service providers etc. (“Suppliers”). The purpose is to ensure provision of high quality and innovative goods and services at competitive rates with an aim to reduce or mitigate ethical risks. Suppliers are expected to comply with applicable laws, policies and standards in relation to their business.

Our goal is to foster commercial relationships with such Suppliers who share similar corporate values as FATIMA, and conduct business in an ethical manner.

This Supplier Code of Conduct (the “Code”) sets out our minimum compliance standards for Suppliers.



2. Scope

This Supplier Code of Conduct (the “Code”) is relevant and applicable to all suppliers of FATIMA. For the purposes of this document, “supplier(s)” or “you” refers to any company, business, or individual providing products or services to FATIMA, or to our clients or customers on behalf of FATIMA, whether directly or indirectly. Unless the context clearly indicates otherwise, “supplier(s)” or “you” also includes the employees, agents, and subcontractors of these entities (i.e. their representatives). This applies to all categories of workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

Suppliers are required to understand and follow this Code and to educate their representatives to ensure they also adhere to it. You are expected to self-monitor and enforce compliance with this Code among your representatives. FATIMA reserves the right to make binding request for the removal of any representative who acts unlawfully or in a manner inconsistent with this Code or any other FATIMA policies or procedures.



3. Definition

Close Relative

It means spouse, child, stepchild, sibling, step sibling, parent and stepparent. It also includes these relationships on the spouse’s side.

Close Relationship

It means relationship other than close relative which has the ability to influence the objectivity of employee. It may include and not limited to personal, financial or family relationships.



4. Policy Statement

“At Fatima Group, our policies are not just guidelines —they are a reflection of who we are.”

This Code underscores our shared responsibility to uphold Fatima Group’s ethical and legal benchmarks. It reflects our collective dedication to integrity, accountability, and responsible business conduct.

In situations where there are discrepancies between FATIMA’s standards (including this Code) and legal requirements, the more stringent standard shall apply. This principle ensures that every action we take reflects the highest level of integrity, compliance, and professionalism.

Our core values form the foundation of the standards outlined above, ensuring our conduct reflects the values we uphold as an organization.

Our Core Values

- ▶ Integrity
- ▶ Valuing People
- ▶ CSR & HSE
- ▶ Customer Focus
- ▶ Teamwork
- ▶ Innovation
- ▶ Excellence

4.1 Compliance with Laws

FATIMA emphasizes the paramount importance of legal compliance for its suppliers. It requires suppliers to adhere strictly to all relevant laws, regulations, and standards in the jurisdictions where they operate. However, FATIMA goes beyond mere legal compliance; it expects its suppliers to uphold the highest ethical standards even when legal requirements are not specifically applicable. In cases where both the Code and local laws address the same subject matter and do not conflict, FATIMA mandates the application of the stricter standard, ensuring that ethical principles prevail in all business dealings.

4.1.1 Human Rights

FATIMA is dedicated to upholding human rights as outlined in the Universal Declaration of Human Rights, the Conventions of the International Labor Organization, the UN Guiding Principles on Business and Human Rights, and the UN Global Compact. FATIMA ensures that our workers are treated with dignity and respect and are provided with a safe working environment, along with the necessary tools and knowledge. FATIMA expects our suppliers to adhere to these same standards.

Additionally, FATIMA encourages its suppliers to continually enhance their commitment to human rights, acknowledging new interpretations and standards that may impact their operations.



4.1.2 Human Trafficking and Forced Labor

FATIMA firmly opposes the use of forced labor practices and is committed to eradicating them within the supply chain. FATIMA strictly prohibits forced labor, child labor, bonded labor (including debt bondage), human trafficking, modern slavery, or any other exploitative labor practices across our workforce (collectively referred to as “forced labor”). We require our suppliers to uphold the same standards and ensure compliance within their own representatives. By agreeing to be a supplier for FATIMA, you affirm that you do not engage in any form of forced or child labor.

Suppliers are also expected to responsibly source any raw materials and products supplied to FATIMA, ensuring they are not sourced:

- ▷ Through forced labor practices, and;
- ▷ From conflict regions, unless the materials are responsibly sourced from those areas.

All work must be voluntary, and workers must be free to leave their employment at any time or terminate their employment without penalty. Suppliers are prohibited from retaining, destroying, concealing, or confiscating identity or immigration documents, such as government-issued identification, passports, or work permits, unless required by law. Additionally, you may not charge recruitment fees to your workers or require them to pay fees to employers' agents or sub-agents for their employment.

4.1.3 Money Laundering

Money laundering is a highly regulated area of law and the applicable law/statutes shall prevail at all times. For ease of understanding, money laundering may be envisaged as procurement, possession, dealing, usage etc. of unregulated proceeds or property that may be a result of a crime or aid and abetment of a crime or a property involved in a crime.

All Suppliers of FATIMA must ensure that no unregulated proceeds or properties are involved in its transaction or dealings, as such money laundering and ancillary practices are discouraged and prohibited by FATIMA and no supplier shall engage into such aforementioned practices.

4.1.4 Non-Discrimination and Non-Harassment

FATIMA insists on maintaining a workplace environment that is devoid of harassment and unlawful discrimination. Suppliers are strictly prohibited from engaging in any discriminatory or harassing practices in their hiring and employment processes, including decisions related to wages, promotions, rewards, and access to training etc. Discrimination based on various protected characteristics such as sex (including pregnancy, childbirth, and gender identity), race, color, religion, sexual orientation, national origin, ancestry, citizenship, marital status, familial status, age, physical or mental disability, medical condition, genetic information, or protected veteran or military status is strictly forbidden.

Furthermore, FATIMA mandates that workers be granted reasonable accommodation for their religious practices. It is crucial that workers are informed of these rights, which can be achieved through comprehensive training programs or other awareness campaigns within the workplace, such as posting informative signs. This proactive approach ensures that all employees are aware of their rights and fosters an inclusive and respectful work environment.

4.1.5 Humane Treatment

FATIMA upholds a steadfast commitment to ensuring a workplace environment free from any form of harsh or inhumane treatment. This includes acts such as sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers. Moreover, any threats of such treatment should be met with zero tolerance. This expectation extends to our suppliers as well, emphasizing that they must maintain similar standards within their own operations. By adhering to these principles, we will be able to foster a culture of mutual respect and professionalism within our organizations.



4.1.6 Employment, Wages and Benefits

FATIMA believes in ensuring fair compensation for workers, providing them with living wages. Compensation should adhere to all relevant/applicable wage laws, covering minimum wage requirements, regulations on overtime hours, and legally mandated benefits. Additionally, FATIMA believes in the importance of suppliers maintaining comprehensive employment documentation in accordance with applicable laws and regulations, including the proper upkeep of employee records.

4.1.7 Working Hours

Working hours are not to exceed the maximum set by local/applicable law, all overtime must be voluntary, and in no event shall work hours exceed applicable legal threshold.

4.1.8 Young Workers and Child Labor

FATIMA firmly prohibits child labor. The term “child” encompasses any individual under the age of 15, or under the age required for completing compulsory education, or under the minimum age for employment in the country, whichever is the highest. While legitimate workplace learning programs that comply with all laws and regulations are encouraged, workers under the age of 18 should not undertake work that may endanger their health or safety.

4.1.9 Freedom of Association

FATIMA shall not endorse any constraints on free speech, thought, expression, consciousness, religion, or association, including the right to engage in collective bargaining unless prohibited by applicable law. It’s crucial that all workers have the liberty to peacefully assemble. Workers and their representatives must have the ability to openly converse and exchange ideas and concerns with management regarding working conditions and management practices, without any apprehension of discrimination, retaliation, intimidation, or harassment. Suppliers are mandated to safeguard workers’ freedom of association and adhere to the stipulations outlined in collective bargaining agreements.

4.1.10 Health and Safety

FATIMA aims to provide a safe and healthy work environment and expects suppliers to maintain the same standards. Suppliers must comply with all relevant health and safety laws, rules, and regulations, and allocate sufficient resources for managing workplace safety. It is vital to ensure that all workers comprehend and adhere to safety practices and procedures. FATIMA believes that a worker’s exposure to potential health and safety hazards must be identified, assessed, and mitigated, and that ongoing occupational health and safety training should be provided as applicable to their business.



4.1.11 Working Environment

FATIMA believes that workers should be provided with a clean working environment, along with ready access to clean toilet facilities, and adequate ventilation and lighting.

4.2 Ethics & Business Integrity

4.2.1 Anti-Bribery and Anti-Corruption

FATIMA believes in practicing the highest standards of integrity in all business interactions conducted on its behalf. It maintains a zero-tolerance policy towards bribery, corruption, extortion, and embezzlement. Bribes, kickbacks, or any other means of obtaining undue advantage are strictly prohibited, whether promised, offered, authorized, or given directly or indirectly through a third party. Suppliers must establish monitoring, record-keeping, and enforcement procedures to ensure compliance with applicable anti-corruption laws. In the event of any misconduct, honesty, directness, and truthfulness are expected in discussions with regulatory agencies and government professionals.

Suppliers shall immediately notify FATIMA of any request that you receive to take any action that might constitute, or be construed as, a violation of applicable anti-corruption laws. Suppliers agree that FATIMA is authorized to take all appropriate actions that we reasonably deem are necessary to avoid a violation of anti-corruption laws.



4.2.2 Anti-competitive Behaviour

Competition laws provide for ensuring free competition in all spheres in commercial and economic activities to enhance economic efficiency and to protect consumers from anti-competitive behavior. FATIMA believes in fair competition and shall not allow for price-fixing, market sharing, output limitation or bid-rigging etc. and anticompetitive or monopoly practices.

All Suppliers of FATIMA must remain vigilant and not indulge in any kind of inappropriate conversation or agreement with competitors that may relate to anti-competitive practices.

4.2.3 Business Gifts and Hospitality

FATIMA understands that the exchange or provision of modest gifts may be an indication of fostering productive business relationships. However, you must not give to, or receive from, FATIMA or its representatives any commission, fee, rebate, or any gift or entertainment of value in connection with a FATIMA contract or other business arrangement with FATIMA or our representatives. This includes situations where you may have, or appear to have, an indirect conflict, such as a significant other or other persons or entities with which you have a relationship.

Suppliers should be aware that FATIMA employees are strictly forbidden to offer or receive gifts or hospitality that do not comply with the internal Gifts and Hospitality Policy. Suppliers must also be aware that no gifts or hospitality must be used to influence any business operation while dealing with FATIMA.



4.2.4 Conflicts of interest

Suppliers and their representatives must ensure that decisions and actions in the course of your relationship with FATIMA are never influenced by, or appear to be influenced by, personal relationships or benefits.

4.2.5 Disclosure of Critical Relationships

If a supplier working with FATIMA or its associated companies and his/her close relatives or close relationships are an employee of FATIMA or its associated companies or have a personal or financial interest in FATIMA or its associated companies; such association must be immediately and fully disclosed (in written form) to the relevant personnel of FATIMA by such supplier.

4.2.6 Record Keeping

FATIMA ensures that all its business dealings are conducted transparently and accurately, with systems in place to maintain documents and records for regulatory compliance and conformity to supplier requirements, while also safeguarding confidentiality. FATIMA expects its suppliers to uphold these same standards, maintaining, creating, and disposing of records and confidential information in compliance with all applicable legal requirements and agreements with FATIMA.

4.2.7 Professional Standards

Suppliers are required to adhere to their own applicable professional standards, policies, and codes, including requirements set by any organizations, such as licensing commissions, that oversee their operations. In instances where there is a conflict between the standards of suppliers and those of FATIMA precedence is given to the stricter standard.

4.2.8 Disclosure of Information and Publicity

Suppliers must not communicate with the media on FATIMA's behalf and must refrain from using FATIMA's name or that of any of our clients or customers or hold yourself out as providing goods or services to or on behalf of FATIMA or any of our clients or customers, except with FATIMA's express written authorization of an officer of FATIMA. Suppliers must also not share details of their bid involvement to any supplier/vendor. Suppliers must not share details of their bid amount to any supplier/vendor or FATIMA Group employee.

Suppliers agree to hold all information provided by FATIMA strictly confidential and to utilize such confidential information solely for the outlined purposes. Any use of data not expressly permitted by FATIMA is prohibited. No confidential information or data shall be released without the prior, mutual written consent of both Parties, except information that is required to be disclosed (i) by any applicable law or by rules of any relevant stock exchange or by any relevant national or supranational regulatory authority; and (ii) before judicial or quasi-judicial body or forum having jurisdiction over the Supplier.

4.2.9 Protection of Identity and Non-Retaliation

FATIMA through its reporting mechanism ensures that the confidentiality, anonymity, and protection of supplier and employee whistleblowers is maintained. Suppliers are expected to establish their own methods and processes for personnel to raise concerns without fear of retaliation.



4.2.10 Protection of Intellectual Property

Intellectual property such as trademarks, copyrights, designs, patents, know-how, methodology, concepts, trade secrets or ideas are critical to FATIMA's business. If these are in ownership, lawful possession or appropriate licenses of FATIMA, they should be dealt with utmost vigilance. Thus, the Suppliers must respect and not infringe any intellectual property that belongs to FATIMA.

4.2.11 No Insider Trading

At FATIMA, we are deeply committed to ethical standards and legal compliance, expecting the same from our suppliers. If you or any of your representatives have material, non-public information, confidential information ("Insider Information") about FATIMA, you (including your household members) may not buy or sell FATIMA securities, or engage in any action to take advantage of, or pass on to others, such Insider Information. Insider trading, whether involving FATIMA securities or those of other companies obtained during our business dealings, is strictly prohibited. Suppliers or their representatives (including close relatives) must refrain from engaging in transactions such as buying on margin, short selling, or trading options related to FATIMA securities while providing services to us.

For guidance, suppliers may consult with FATIMA's representative.

4.2.12 Export Controls and Sanctions

Both FATIMA and its suppliers are obligated to adhere to all applicable export control and economic sanctions laws and regulations. If any obligation under an agreement would violate these laws or regulations, neither party is required to fulfill that obligation if doing so would violate, be inconsistent with, or expose either party to punitive measures under relevant export control or economic sanctions laws and regulations. In such cases, the party unable to perform must promptly notify the other party in writing. Subsequently, the affected obligation may be suspended until it can be lawfully discharged, or the agreement may be terminated if lawful discharge is not possible.



4.2.13 Protection of the Environment

FATIMA is a company with a global ambition for excellence, growth and sustainability in being environmentally responsible. Suppliers are encouraged to develop and implement an environmental friendly policy and to operate in compliance with all applicable environmental laws, policies and standards.



4.3 Reporting, Monitoring & Audit

4.3.1 Monitoring and Audit

FATIMA (or its authorized representative) may monitor your compliance with this Code. This may include onsite audits of you or your subcontractor's, facilities and other operations.

FATIMA will consider compliance with the Code in its procurement decisions. Any violations of this Code or applicable law may jeopardize your business relationship with FATIMA, up to and including termination. In doing business with FATIMA, you agree that FATIMA may terminate any purchase order or supply agreement with you for breaches of this Code without further liability to FATIMA.

4.3.2 Reporting/Flag-It



In the event, Supplier apprehends or witnesses' actual contravention of any core values of FATIMA or breach of any of the aforesaid policies, by any employee or representative of FATIMA, it must immediately report to FATIMA in the following ways:



flagit@fatima-group.com



Scan the QR



fatima-group.com/tell-fatima

- **FATIMA** strictly prohibits acts of retaliation against anyone who has, in good faith, sought advice or has reported possible violations of this Code.
- **SUPPLIERS** must assist in compliance with this Code and fully cooperate in an investigation of potential violations hereof.
- **FATIMA** commits to protect the confidentiality of the whistle-blower(s) / Flag-raiser(s) who report any unethical or illegal practices. A Flag-raiser may choose to reach out to anonymously (for details refer Flag-It Policy).