SUPPLIER CODE OF CONDUCT





Introduction

Westlife Foodworld Limited (WFL), formerly known as Westlife Development Ltd (WDL), focuses on setting up and operating Quick Service Restaurants (QSR) in India through its subsidiary Hardcastle Restaurants Pvt. Ltd. (HRPL). The Company operates a chain of McDonald's restaurants in West and South India having a master franchisee relationship with McDonald's Corporation USA, through the latter's subsidiary. WFL is committed to upholding ethical and responsible business practices in every aspect of our operations, including our supply chain. This Supplier Code of Conduct (the "Code") establishes fundamental standards that all WFL's suppliers must adhere to. At a minimum, we require that all suppliers and their facilities meet the standards and promote the principles outlined in this Code, which are intended to advance WFL's commitment to all aspects of sustainability (ethical, environmental, and economic).

Scope

This Code extends to all suppliers directly providing goods or services to WFL or any of its subsidiaries. The provisions of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier and WFL or any of its affiliates. We expect suppliers to hold their supply chain, including subcontractors and third-party labor agencies, to the same standards contained in this Code. This Code does not create any third-party beneficiary rights or benefits for suppliers, subcontractors, their respective employees or any other party.

Human Rights

UN Declaration of Human Rights: We expect our suppliers to conduct their activities in a manner that respects human rights as set out in The United Nations Universal Declaration of Human Rights. In addition, suppliers shall uphold the following labor practices:

<u>Freedom of Association</u>: Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations, which may facilitate collective bargaining.

<u>Employment Status</u>: Suppliers shall employ workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work status through appropriate documentation.

<u>Employment Practices</u>: Suppliers shall not use any form of slave, forced, bonded, indentured, or involuntary prison labor. They shall not engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking. They shall not



retain employees' government-issued identification, passports or work permits as a condition of employment.

Anti-Discrimination and Fair Treatment: Suppliers shall promote and maintain a workplace free from discrimination and treat their employees with fairness, dignity and respect. Suppliers shall not discriminate on the basis of race, ethnicity, gender, sexual orientation, age, nationality, religion, union status, and/or marital status. No form of physical, sexual, psychological or verbal harassment or abuse shall be tolerated.

Working Hours and Rest Days: Employees shall be allowed at least one day off every seven days, and any overtime worked shall be voluntary. If local law allows, employees may voluntarily work overtime on rest days, provided that they are allowed at least one day off within the next seven days. Continuous working days are never to exceed 21 days without a rest day.

<u>Underage Labor</u>: Suppliers shall ensure that no underage labor has been used in the production or distribution of their goods or services. A child is any person under the minimum employment age according to the laws of the facility's country, or, in the absence of law, under the minimum age for completing required education. Suppliers shall not employ anyone younger than 14, regardless of the country's minimum working age.

<u>Wages and Benefits</u>: Suppliers shall ensure that their workers are paid lawful wages, including overtime, premium pay, and equal pay for equal work without discrimination. There shall be no disciplinary deductions from pay.

Workplace Environment

Suppliers will provide a safe and healthy working environment that minimizes physical and mental stress. Suppliers shall ensure that all workers receive communication and training on emergency planning and safe work practices. In addition, suppliers shall have systems to prevent, detect and respond to potential risks to the safety, health and security of all employees.

Environmental Management

Suppliers are responsible for managing, measuring and minimizing the environmental impact of their facilities. Specific focus areas include pollution prevention, waste reduction, recovery and management, water use and disposal, and greenhouse gas emissions. Suppliers shall make efforts to conserve water, energy, and other raw materials in their operations and seek to maximise resource efficiency. Suppliers shall



work to protect biodiversity by adopting measures to avoid deforestation and contribute to the protection and restoration of forests and natural habitats.

Business Integrity

<u>Compliance with Law</u>: Suppliers' business activities shall comply with applicable laws and regulations in the countries and jurisdictions in which they operate. This Code applies to activities in the locations where suppliers' goods are produced, where any related services are performed, and where the goods enter the supply chain.

Anti-Bribery & Conflict of interest: Suppliers shall not engage in any form of bribery, kickbacks, corruption, extortion or embezzlement. Suppliers shall not take any action that would violate, or cause WFL to violate, any applicable anti-bribery law or regulation. Suppliers shall avoid or disclose any potential conflict of interest.

<u>Anti-Competitiveness</u>: Suppliers will engage in fair competition and abide by all applicable laws, including Antitrust and Competition Laws of India.

<u>Books and Records</u>: Suppliers shall maintain accurate and transparent books, records and accounts to demonstrate compliance with applicable laws and regulations and this Code.

<u>Confidentiality</u>: Suppliers shall safeguard WFL information by keeping it secure, limiting access, and avoiding discussing or revealing such information in public places. These requirements extend even after the conclusion of a supplier's business relationship with WFL.

Compliance and Monitoring

<u>Audits and Assessments</u>: WFL reserves the right to audit compliance with this Code. Audits are facility inspections that include employee interviews and a review of supplier records and business practices. Such audits are conducted by WFL or its approved monitoring firm. If an audit identifies a violation of this Code, suppliers shall act promptly to correct the situation to WFL satisfaction.

<u>Grievance Mechanism</u>: Suppliers shall create internal programs for handling reports of workplace grievances, including anonymous reports.

Whistleblower Protection: Suppliers are responsible for prompt reporting of actual or suspected violations of law, this Code, the Standards of Business Conduct for WFL employees, or the Supplier Guidance Document. This includes violations by any employee or agent acting on behalf of either the supplier or WFL. Such programs shall protect worker whistleblower confidentiality and prohibit retaliation.



<u>Additional Standards</u>: In addition to complying with this Code, suppliers are responsible for complying with the Supplier Guidance Document and being aware of and supporting the Standards of Business Conduct for WFL employees.

Reporting Violations

<u>Reporting Violations</u>: Suppliers and their employees are encouraged to report suspected violations of this Code to WFL through email at sustainability@mcdonaldsindia.com.

<u>Consequences of Non-Compliance</u>: Suppliers will promptly address any instances of non-compliance identified through monitoring or audits. Suppliers failing to comply with this Code may face corrective actions, up to and including termination of their business relationship with WFL.