

Supplier Code of Conduct

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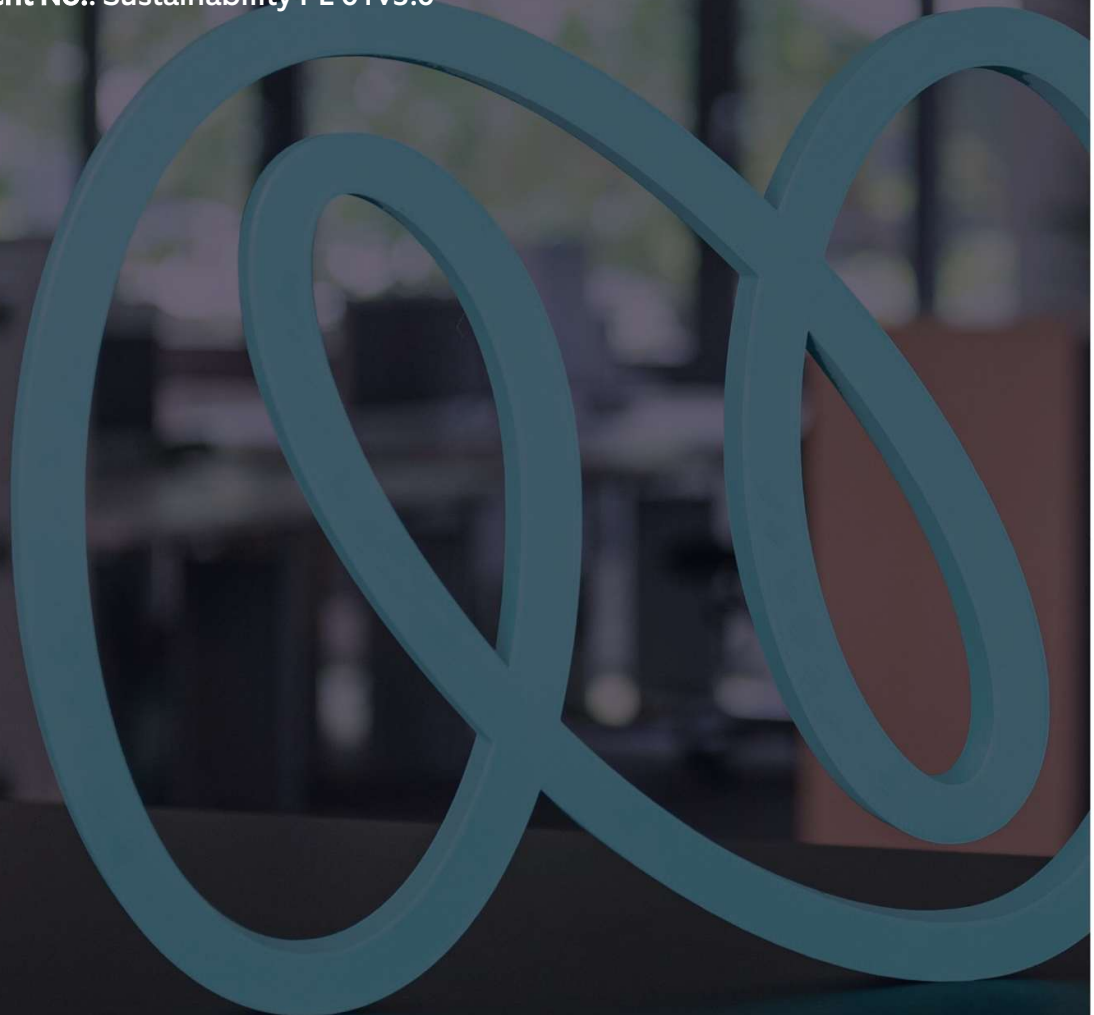
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1. Introduction

Doing business right is of utmost importance for Nagarro. Maintaining ethics, business integrity, and compliance with applicable regulations is critical for building trust with all stakeholders. Our [CARING](#) values guide us at every step in this journey. We believe that our business partners / supplier-partners (herein after referred to as business partners) are an integral part of our ecosystem and invite them to work together with us to foster diverse and responsible supply chains.

Our procurement program¹ and supplier code of conduct have been formed considering the above and draws inspiration from the principles set out in ISO 20400 which is a guidance document for sustainable procurement. We strongly encourage our business partners to follow suit by analyzing their own operations and their supply chains, identifying areas of risks and opportunities, and based on their findings to establish a robust sustainable procurement program.

This supplier code of conduct outlines the principles that we value highly in our supply chain and applies to all our business partners and their parent, subsidiary, and affiliated entities. We require our suppliers to adhere to these principles, invite them to refer to this as a guide in their own sustainability efforts and extend this further into their supply chains. We understand that putting these principles into practice is a dynamic process, thus we urge our suppliers to focus on effective solutions with continuous improvements rather than quick fix solutions that tend to be non-functional. We invite business partners to work together and encourage one another in achieving the objectives.

This code serves as an additional set of guidelines and expectations that business partners must adhere to in their dealings with Nagarro, in addition to any existing contractual obligations. By signing this code, the business partners permit Nagarro to audit their compliance to this Code of Conduct. They also maintain their own internal management systems to ensure the same standards and expectations outlined in this code of conduct are followed by their subcontractors or outsourced partners.

For any queries, suggestions, or to report violations against this code of conduct, please write to: partner.connect@nagarro.com.

The Nagarro supplier-partner hereby warrants that today and for the period of their business relationship with Nagarro agree to comply with the following obligations:

2. Obligations

2.1. Legal and ethical obligations

Business integrity

- They comply with all applicable local and regional laws. These include but are not limited to applicable international trade controls, anti-money laundering, human-trafficking, and counter-terrorist financing laws.
- They ensure lawful disclosure of information by ensuring a high level of transparency and trust in all business dealings.
- They should appropriately share information and support documentation regarding labor, health and safety and environmental practices in accordance with applicable legal and industrial practices to enable Nagarro to perform and complete supply chain due diligence.

¹ Includes Nagarro's policy for sustainable procurement, inclusion of minimum sustainability related criteria in the vendor management forms for new business partners and suppliers, and sustainability assessment/questionnaire of new and existing business partners and suppliers.

Corruption and anti-competition practices

- They do not engage in, or support, any corrupt practices such as bribery, tax evasion, money laundering, or any unfair or anti-competition trade practice.
- They never offer any bribes or non-monetary inducements to any Nagarrian (Nagarro employee) or Nagarro partner. They should report any corrupt request they receive from any Nagarrian or Nagarro partner to whistleblower@nagarro.com.

Conflicts of interest

- They are aware that this policy applies to situations where any Nagarro employee or director may have any kind of interest in the supplier's business.
- They promptly disclose any conflicts of interest to conflictsregister@nagarro.com to uphold the principles of fair competition.

Sharing of non-public Information

- They do not use any non-public information they have about Nagarro to buy or sell Nagarro shares to their advantage.
- They exercise caution and refrain from sharing any such information with others to prevent any unauthorized use or potential exploitation.

Protection of confidential information and intellectual property

- They take full care to protect Nagarro's confidential information and intellectual property and those of its other business partners.

Use of brand and representation

- They do not represent Nagarro or use its brands in any way without Nagarro's written permission.
- They adhere to this guideline to ensure proper brand management and to maintain consistency and control over Nagarro's image and messaging.

2.2. Human rights and social responsibility obligations

Compliance with labor laws and international human rights standards:

- They comply with all applicable laws related to workers, including wages, legally mandated benefits, working hours, holidays and leaves and overtime wages.
- They should be aware of and uphold international standards on human rights such as those laid out by the International Labor Organization, United Nations' Guiding Principles on Business and Human Rights, etc.

Elimination of child and forced labor

- They do not employ child labor or forced labor nor knowingly use products or services created from such labor.
- All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per the worker's contract.

Non-discrimination and protection against abuse

- They provide equal opportunity and prohibit discrimination among their employees based on ethnicity, gender, marital status, pregnancy status, religious belief, sexual orientation, transgender identity or expression, age, medical condition, or disability. They support and protect the rights of people with disabilities, indigenous peoples and minority groups.

- They have written policy and controls to prevent sexual harassment, cruelty, exploitation, and abuse.
- They have mechanisms for employees to raise a grievance in confidence, with no retaliation or reprisal for the employee who raised the issue.

Responsible sourcing of minerals

- They ensure minerals and other materials in their supply chains are sourced only from responsible and conflict-free sources.
- They expect their business partners to employ significant precautions when sourcing materials from conflict-affected regions to ensure their business activities are not, knowingly, or unknowingly, contributing to human rights abuses.

Workplace health and safety

- They ensure that their workers have a safe, secure, hygienic, and conducive work environment, adhering to all relevant safety regulations, laws, and protocols.
- Their employees are provided with awareness and relevant training of industry-specific hazards and have the right to refuse unsafe work, as well as a way to raise workplace concerns without the fear of retaliation.
- They are encouraged to implement measures to enhance the physical and mental health of employees on an ongoing basis.

Workers' rights and freedom of association

- They support and protect workers' rights of freedom of association and collective bargaining through strong internal policies and other mechanisms like training and communication.

Grievance mechanism:

- They provide internal and external stakeholders with a functional grievance mechanism to bring to their notice any violation related to concerns mentioned in this code of conduct.

Positive social impact:

- They are encouraged to make their best efforts to generate positive impact on local communities by factoring appropriate social considerations into the lifecycle of their operations and find opportunities to maximize positive social impact through responsible business practices.

2.3. Environmental sustainability obligations

Support corporate environmental responsibility

- They are encouraged to actively support Nagarro's efforts towards corporate environmental responsibility and reduce the environmental impact of their business operations.
- They may encourage their employees to practice environmentally responsible behavior through awareness programs and activities.

Compliance with environmental permits and international environmental management systems:

- They should have all applicable environmental permits and follow their operational and reporting requirements.
- They have established international environmental management systems such as ISO 14001.

Energy consumption and greenhouse gas emissions:

- They are encouraged to track, document, and seek to minimize energy consumption, improve energy efficiency, and reduce greenhouse gas emissions.
- They are encouraged to identify opportunities to add renewable energy sources to their overall energy mix.

Control and reduction of environmental impact:

- They are encouraged to identify, monitor, control and reduce hazardous air emissions, wastewater, and waste generated from operations.
- They are particularly careful about their impact on the surrounding environment including air, land, water bodies, communities, and other forms of life.
- They are encouraged to factor appropriate environmental considerations into the full lifecycle of their processes, technologies, products, and packaging to optimize the environmental performance of their products and services.
- They should make their best efforts to protect and generate positive impact on biodiversity wherever possible.

Water conservation and efficiency:

- They are encouraged to track and document water consumption. They are encouraged to actively seek ways to improve water efficiency and reduce water consumption through awareness and innovative efficiency interventions.
- They are encouraged to implement measures to harvest water from wastewater recycling and rainwater wherever possible.

Environmental risk mitigation and sustainability improvement:

- They are encouraged to have an effective plan, like an environmental policy or program to mitigate environmental risks and to continuously improve their sustainability performance, the implementation of which may be evident throughout all levels of the company.
- They are encouraged to submit their emissions data on CDP and gain EcoVadis accreditation or any other internationally recognized protocols.

For any queries, suggestions, or to report violations against any of the above, please write to our procurement team at partner.connect@nagarro.com.

Full Name: _____

Company: _____

Title: _____

Date: _____

Signature: