

1. OBJECTIVE

The purpose of Code of Conduct & Ethics (the "Code") is to conduct the business of the Company and its subsidiaries by the applicable laws, regulations, rules and with the highest standard of ethics and values.

2. SCOPE

This policy is applicable to all the employees including Contract People and Fixed Term Employees.

3. RESPONSIBILITY & ACCOUNTABILITY

- HR Department is responsible and accountable for the compliance of this policy.
- Heads of all other departments are also responsible and accountable for the compliance of this policy limited to processes & practicing of their respective departments.

4. GENERAL POLICY

- All employees should respect their colleagues. Any kind of discriminatory behavior, harassment or victimization is not allowed.
- Employees should conform with equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.
- Any person entering the workplace must be wearing appropriate clothing according to the Attire Policy.
- Any employees should not accept any gift/ favour, personally or professionally from clients or partners of the company.
- All employees are expected to be ethical and responsible when dealing with company's finances, products, partnerships, and public image.
- All employees are expected not to abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions, or other benefits that company offers.


Initiated By: Head HR
Approved by: Managing Director

- All employees and visitors to the workplace must comply with safety norms/policies/standards as prescribed by the safety department of the company.
- All employees are expected to protect personal information that is shared by employees during employment, consistent with applicable data privacy laws, including the rules surrounding the collection, processing, use, transfer, and disclosure of personal information.
- Unless required by law or government bodies or authority by their management, employees shall not disclose confidential information or allow such disclosure.

5. CONFLICT OF INTEREST

All employees are expected to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties. Employees should not get in situation of conflict of interest. Following are situation which will be treated as conflict of interest.

5.1 Personal investments:


Personal investments in suppliers, partners, or competitors of the company, especially if significant or if an employee is in a position of authority to help investments, are inappropriate and which prejudice the interest of the company. Even if the employee would personally not do anything inappropriate, the investment is likely to create an appearance of conflict which is best avoided. Employees are requested to declare such investments that have led into conflict or shall lead into conflict.

5.2 Employment with suppliers, partners, or competitors:

Employment with suppliers, partners, or competitors of the company including as a consultant can create a conflict of interest.

5.3 Board memberships of suppliers, partners, or competitors:

Memberships on the boards of suppliers, partners or competitors can present a conflict of interest as such positions have the power to influence actions. Employees are requested to declare such board membership (if they already have such position) that have led into conflict or shall lead into conflict.


Initiated By: Head HR
Approved by: Managing Director

5.4 Business/ Research opportunities:

Business opportunities or ideas found through your work and/or suggested by any employee at the company clearly belong to the company.

Any research work done with company resources at company research center would be treated as work belong to company ownership.

Any breach of confidentiality information related to Business Opportunities/ Research work would not be tolerated.

6. CORPORATE ASSET

All employees are expected to conserve and utilize company resources and assets in best way possible.

6.1 Intellectual Property:

Intellectual property would mean all patents, trade-marks, business processes, domain names, and copyrights, logos along with all processes, inventions, ideas, programs, codes, software, algorithms, discoveries, correspondence, and trade secrets.

All employees should ensure the security and protection of these whether used in the course of any assignments or otherwise.

Any unauthorized use of this can lead to a serious loss of value for the company. Any use of the same must be cleared in advance by the Marketing and Legal team.

6.2 Company Equipment:

All employees are expected to use the equipment provided by the company in most efficient way.

All employees are liable to use the immovable equipment such as plant machinery, computer system or safety devices with care. Any Intentional damage can cause a disciplinary action against the person responsible for it.

All employees are personally liable to use the movable equipment such as laptop or mobile phone with care. Any Intentional/ unintentional damage can cause a disciplinary action against the person responsible for it.



Initiated By: Head HR
Approved by: Managing Director

6.3 Internet Network:

All employees are expected to use the internet network in best interest of the company. No employee is allowed to use company internet network for personal use either on mobile/ laptop or any other personal device.

7. CODE OF CONDUCT TOWARDS SOCIETY

7.1 National Interest:

All employees are expected to conduct business in the best national interest and shall not be engaged in any activities that shall put national interest at risk.

7.2 Compliance with laws, regulations, policies and procedures:

Each employee must comply with all applicable laws, rules or regulations, the protocols, policies and procedures of the Company and also encourage other officers and employees to do the same.

7.3 Bribery & Corrupt Practices:

Employees shall not engage in any corrupt Practices including offering/accepting bribes or kickbacks or any other kind of improper payment including facilitation payments, giving false incentives, indulging in the /fraud, embezzling funds, indulging in personal money transactions or personal entertainment with vendors / suppliers / government body.

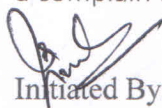
7.4 Environmental Protection:

All employees are expected to comply with applicable environmental laws and requirements as per company/ government to protect the communities in which company operates, surrounding environments and the world as a whole.

8. VIOLATION OF THE CODE

8.1 Reporting Concern:

Any employee who come in knowledge of breach of any of the policy above, can register a complain to the Immediate Supervisor/ Manager/Plant Head/ HR Department.



Initiated By: Head HR
Approved by: Managing Director

8.2 Investigation:

- If any employee is observed to breach the Code of Conduct Policy in any way, an investigation can be done against that employee.
- Investigation can be done by the Immediate Supervisor/ Manager/Plant Head/ HR department.
- The investigation should be completed within 15 days of the issue raised.
- The investigation report should be submitted to "Plant Head & HR Head", with recommendation of corrective actions/ disciplinary consequences.

8.3 Disciplinary Consequences:

- If an obvious policy violation occurs, the department supervisor/ manager/ HR department will hold a private discussion with the employee and counsel the employee not to repeat such behavior.
- If the breach has resulted in financial loss, company can claim the amount from the employee.
- Repeated policy violations will result in disciplinary action, up to and including termination.
- If the breach is critical or severe in nature, the consequences can consider the legal aspect and the legal actions can be taken accordingly.

END OF POLICY

x *Pranav D. Patel*
Pranav Patel
Managing Director

Date:



Initiated By: Head HR
Approved by: Managing Director