



Code of Business Ethics

This code of business ethics has been designed which the Company expects to be followed by all directors & by employees in the course of employment with us. This would help in establishing appropriate behavioural norms for the employees primarily focusing on discipline, self-control, professionalism and best ethical practices. It aims at creating and building employees core values, determining best-in-class practices and establishing centers of excellence in the Company. Directors and Employees of the Company must respect and comply with all laws, rules and regulations of India and other countries in which the Company conducts its business. They should strive to keep themselves updated concerning the laws/statutory compliances applicable to their scope of work.

Ethical Conduct

Directors and Employees of the Company must help to create and maintain a culture of high ethical and professional standards. They are also expected to:

- Conduct business operations in compliance with competition laws and principles of fair market competition.
- Not to conduct own selves in a manner as may bring disrepute to the office or tarnish the reputation and image of the Company.

Products and services

We are committed to supplying products and services of world-class quality that meet all applicable standards. The products and services we offer shall comply with applicable laws, including product packaging, labelling and after-sales service obligations. We shall market our products and services on their own merits and not make unfair or misleading statements about the products and services of our competitors.

Competition and Fair Dealing

We believe in free and open competition, and we never engage in improper practices that may limit competition through illegal and unfair means. We do not enter into agreements with competitors or any other person to engage in any anti-competitive behaviour, including rigging prices or forming cartels or restricting free play of competition in our relevant markets.

All Directors, Employees and Associates of the Company are obligated to deal fairly with fellow employees and with the customers, suppliers, competitors and other third parties engaging/dealing with the Company. They should not take unfair advantage of anyone through manipulation, concealment, or abuse of privileged information/position, misrepresentation or any other unfair-dealing practice.



Our dealings with our customers shall be professional, fair and transparent. We respect our customers' right to privacy in relation to their personal and shall safeguard our customers' personal data, in accordance with applicable law.

Professionalism and abstinence from inappropriate behaviour or harassment

The Company is committed to provide a work environment that is open, mutually supportive and free of inappropriate behaviour of all kinds and harassment on account of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender identity. Employees are responsible for supporting the Company in this endeavour and are expected to demonstrate high professional behaviour. Professionalism is created through exercising high standards of integrity and honesty in work, mutual respect towards other individuals in building cordial relationships, good business practices and maintaining a high level of competence.

Health and Safety in the workplace

The Company promotes well-being of all its Directors, Employees and Associates and is committed to provide good and safe physical working conditions. All Employees should exercise high standards of safety, hygiene and housekeeping. Health and safety are of paramount importance. The Employees must comply with the Company's health and safety norms as communicated to them from time to time and should bring to the Management's attention any workplace safety or health hazard. It is mandatory on the part of an Employee to eschew unsafe and dangerous practices or measures even if these are considered appropriate for business interest reasons. Employees should attend safety training sessions (as and when organized by the Company) for increasing safety awareness and adoption of safe working methods.

Sexual Harassment

No Employee shall engage in any activity which tantamount to sexual harassment as per prevailing laws. In case an employee is found to misbehave with any other employee within/outside the office premises or involves in an act of sexual harassment of any nature whatsoever, violations of this may lead to disciplinary actions, including immediate termination of employment. The company will conduct workshops to educate the employee about current provisions of laws & relevant rules from time to time. The employees are expected to follow the instructions given in the workshops.



In case internal complaint committee constituted under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, arrives at a conclusion that any female employee has made malicious or false allegation or has produced any forged or misleading document, it may recommend to the Company to take such action and in such manner, as may be prescribed under the said Act and Rules made thereunder.

Equal Opportunity

We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.

When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential. We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code.

Freedom of Association

The Company recognizes and respects the right of its employees to exercise freedom of association in matters related to their employment, as per policies and procedures of the Company, without them having any apprehension. The Company is committed and respects the right of collective bargaining of its employees, as per applicable laws/guidelines/regulations.

Communities

We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate. We engage with the community and other stakeholders to minimise any adverse impact that our business operations may have on the local community and the environment. We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable, and in particular the 'Conflicts of Interest' clause are followed.



Environmental & Sustainability

Company is committed to environmental and social responsibility. We recognize that our purchasing/sale decisions have a significant impact, and we are dedicated to incorporating sustainability principles throughout our purchase/sale process. We prioritize the purchase/sale of products will Reduce energy and resource consumption, water-efficient and minimize pollution and waste generation.

We further commit to:

- Identifying our environmental risks, including climate change, and developing plans to mitigate them.
- Protecting the environment by ensuring prevention of pollution is a key consideration in the design of all our assets.
- Using resources more efficiently by using sustainable materials and reducing waste.
- Identifying opportunities to use alternatives to hazardous materials.
- Seeking ways to enhance the natural value of the areas we work for the benefit of local communities and the environment.
- Ensuring all our employees have the training, skills, knowledge and resources necessary to achieve the requirements of our internal standards.
- Continually improving the Environmental Management System by reviewing and challenging our performance using feedback from stakeholders and benchmarking against our contemporaries.

Human rights

The Company has zero tolerance towards and prohibits engagement of Child Labour, Forced Labour and any form of human trafficking. The Company is committed to ensuring that no instance of Child or Forced Labour occurs in any of its operations and establishments. The Company prohibits associated vendors, contractors and suppliers from engaging child and/or forced labour.

The Company is committed to protect the right to privacy of its employees and other stake holders. The Company does not disclose personal information/data to third parties, without consent of its stakeholders, unless required by law/Statutory Authorities etc., to do so.

Value-Chain Partners

Value Chain Partner shall always maintain the highest standards of ethical conduct and is expected to comply with all the applicable local, national, and multi-jurisdictional laws and regulations (broadly and collectively, the “Laws”) related to the conduct of its business. All products and services delivered must meet the timelines, quality, specifications, terms agreed and comply with applicable Laws concerning importing, exporting, re-exporting or transfer or packaging or labelling or sales or after sales of products and services.



Value Chain Partner is encouraged to develop and implement practices that reduce negative environmental impacts and have processes in place to optimize the use of natural resources, reduce the release of harmful emissions, solid waste, waste water in the environment and produce environmentally compatible products and services.

Public Policy Engagement and Responsibility thereof:

Company emphasizes that public policy advocacy must expand public good. The Company also ensures that businesses operate with values such as integrity, equity, ethical conduct, transparency across all their public advocacy positions. Company endeavours to remain accountable towards its stance as an organization and the role Company plays in moulding public policies and its exchanges with trade associations to raise industry benchmarks.

- ✓ The company shall endeavour to operate within specified national and international legislative and policy frameworks and engage with the government for public policy development. The Company remains ethical, unbiased and transparent, ensuring that it does not undertake any adverse activities in line with the nation's interest or those that will have any negative social impact.
- ✓ The Company shall strive to preserve and propagate public good, and practices inclusiveness through actions and strives not to advocate any policy that will only benefit the company or any other single stakeholder.
- ✓ The company shall endeavour to extend its grievance redressal mechanism to expand its reach and to promote fair competition and respect for human rights through its policy advocacy position.

Stakeholder Interest

We are committed to enhancing shareholder value and complying with laws and regulations that govern shareholder rights. We shall inform our financial stakeholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable law and agreements.

Amendment

The Board so authorised for the purpose shall have the powers to review or amend any of the provisions of this Policy, substitute any of the provisions with a new provisions or replace this Policy entirely with a new Policy.

Effective Date

The Policy shall become effective from the date of its adoption by the Board i.e. 27th April, 2024.