

Code of Conduct for Employees, Executives and Directors

Child Labor

We prohibit employment of child labor strictly.

Forced Labor and Prison Labor

We prohibit recourse in any form whatsoever, to slavery servitude for debit and forced or compulsory Labor as well as products or services created by these means.

Health, Safety and Environment

We promote safety and health at work and strive to avoid all types of Labor which, by its nature or the condition under which it is carried out, might compromise safety and health.

We endeavor to reduce environmental pollution on a continuous basis to meet the applicable environmental regulations.

There will be no compromise in our commitment to health, safety and responsible care for the environment. Health and safety of the people in and around its area of operations are of paramount importance to the Company. The Company is committed to environment protection, pollution control and maintenance of ecological balance. The Company shall maintain high standards of pollution control, environment protection and safety.

Compensation and Working Hours

We believe in compliance with local Labor laws regarding remuneration, working hours and working condition.

Freedom of Association

We respect the workers, right to have a Collective Bargaining Agent and deal with them according to the requirements of local Labor laws.

Discrimination

We prohibit discrimination, and in particular, racial, ethical, religious or gender discrimination.

Adherence of Basic Human Rights free from Harassment or Abuse

We prohibit all practices of gender or psychological harassment. There would be zero tolerance on harassment or abuse.

All staff will maintain an environment that is free from harassment and in which all employees are equally respected. Workplace harassment is defined as any action that creates an intimidating, hostile or offensive work environment. Such actions include, but are not limited to, sexual harassment, disparaging comments based on gender, religion, race or ethnicity.

The company will take appropriate measures to ensure a discrimination-free workplace. Every employee has the right to be protected from harassment. The principles of equal treatment apply in employees' daily dealings with each other and to all processes relating to the working relationship, including the hiring and promotion of personnel. Accordingly, there will be no potentially discriminatory questions posed in job advertisements, at job interviews or when making decisions on new appointments. The same applies to career prospects, promotions, vocational training, remuneration and dismissal.

Every employee is entitled to basic human rights, regardless of their nationality, ethnicity, religion, language, or any other status. These rights are universal, inalienable, and interdependent.

Corruption Free Corporate Culture

The payment of bribes kickbacks or other payments in cash or kind to obtain business or otherwise gain advantage is strictly prohibited, irrespective of whether payments or offers are made directly or (knowingly) via an intermediary.

Such payments are fundamentally inconsistent with the desire to maintain high standards of integrity in its business and relationships.

Environment, Social and Corporate Governance (ESG) Practices

We adhere strictly to the best practices and ensure commitment to strengthening Environmental, Social and Corporate Governance (ESG) areas in accordance with the global best practices. We are committed to minimize company's operations impact on environment, maintain best relationships leadership & management's practices, policies, internal controls and shareholders' rights by adopting:

To encourage the management to adopt digitalization to enhance efficiency and to protect the environment;

To promote and ensure compliance with ESG policy of the company, if any;

To encourage philanthropic activities, donations, contributions to charities and other matters of social welfare, in terms of sustainable practices;

To encourage the management to publish or disclose regular reports on their ESG targets, environmental and social impact activities;

To ensure that the company operates in an environmentally and socially responsible manner, while having strong governance practices in place;

To ensure that the company adopts most efficient energy management system, prevention of energy waste and utilization of natural resources in responsible manner;

To ensure commitment to prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment in accordance with the applicable laws.

Avoid Conflict of Interest

The employees will not:

- get into any such business or practice that would tend to influence him/her in a way other than in the best interests of the company;
- get into any business transaction or agreement that would result in the conflict of interest in any manner, other than those in the best interests of the company;
- receive gifts and other benefits from the outsiders having pecuniary and other interest.

Ensure Confidentiality

The employees will:

- Protect confidential and sensitive information.
- Avoid discussing confidential matters in unauthorized or public spaces.
- Follow all legal guidelines and company policies regarding data protection and privacy.
- Protect confidential, proprietary and any such information received by virtue of their position in the company and not disclose such information to anyone, unless the disclosure is required under any law or authorized by the board of the company;
- not use or intend to use the confidential and proprietary information for gaining unfair advantage and personal benefits, unless it becomes public.

Avoid Insider Trading

To not indulge in insider trading on the basis of unpublished price sensitive information, subject to exceptions given in section 128 of the Securities Act, 2015, and ensure compliance with all relevant laws and company's policies, if any, on prohibition of insider trading.

Conduct in Business Dealings:

- Treat everyone, inside and outside the company, professionally with respect and equality without taking improper advantage of their position;
- To not involve in such practices like manipulation, misuse of privileged information and concealment of facts.

Integrity and Honesty:

The employees will:

- Conduct all activities honestly and ethically.
- Do not engage in any form of dishonest behavior such as fraud, theft, or deception.
- Act, at all times, with honesty, integrity and independence to protect company's properties, reputation and image, and not get into dishonest practices such as bribery or corruption, etc;
- Exercise due diligence, objectivity, sound and independent judgement while performing the duties;
- not involve in practices with the intention to get any undue advantage either for himself or his family members.

Understanding of the Legal Duties:

The employees will:

- Acquire appropriate knowledge of the legal requirements relating to their duties to perform their obligations diligently and in compliance with the applicable laws, relevant guidelines and policies of the company and to ensure compliance of applicable regulatory frameworks;
- Make dedicated efforts to improve competence and skills in their respective roles through continuing professional education;
- Bring to the notice of the board, any non-compliance or violation of law or policy by the company, other board members or employees.

Personal Conduct:

The employees will:

- Avoid misconduct, intimidating & insulting behavior, verbal onslaught, accusations, misogynist behavior, sexual harassment, ignorance of regulatory framework, spate communication (letters, emails, etc.) without highlighting specific discrepancies, humiliation, pressurizing tactics, coerciveness, disruptive and distractive measures, bullying, disruption of conduct of

business, unnecessary interference in management issues, unethically tarnishing image of any person;

- Exhibit high standards of personal conduct, both inside and outside the company.

Role towards Shareholders/Members and other Stakeholders:

- Treat all shareholders/members and stakeholders of the company in a fair and respectable way;
- Act in the best interests of the company and fulfill their fiduciary responsibilities *qua* the company;
- Understand and consider the interests of all stakeholders in the success of the organization.

Compliance with Laws and Regulations

Directors, who are required to oversee the affairs of the Company, shall assure that the management is carrying out its affairs prudently in line with existing laws, rules and regulations including Articles of Association.

Ethical Conduct

Integrity is a cornerstone of the business. Directors shall adhere to the principles of fairness, integrity and professionalism and shall discharge their duties with due and reasonable care, skills and diligence and shall exercise independent judgment. They shall not assign their office and any such assignment so made shall be void.

Disclosure of Interest

Directors must take care to ensure that they identify and avoid any situation of actual or apparent conflict with the interest of the Company, whether the situation involves the director directly or a member of his or her immediate family. They shall not achieve or attempt to achieve any undue gain or advantage either to themselves or to their relatives, partners, or associates.

Further, every director, including his/her spouse and minor children, who is in any way, whether directly or indirectly, concerned with or interested in any contract or arrangement entered into, or to be entered into, by or by the Company shall disclose the nature of his/her concern or interest at a meeting of the directors and abstain from discussion, voting or otherwise influencing a decision on any matter related to such contract and/or arrangement.

False or Misleading Statements

Directors shall not make a statement or disseminate information, which is misleading or false and/or is likely to induce sale or purchase of securities by any person and/or is likely to affect the market price of the Company's shares.

Other Directorship

If a Director wishes to become officially involved with any third party corporation or other organization as director, trustee, officer or advisor, the director must inform the company about change of his other directorships.

Safeguarding Company's Assets

Use company's assets, property, proprietary information and intellectual rights for business purposes of the company and not for personal benefits or gains and to make utmost efforts for the protection and efficient use of the company's assets.

Protecting Shareholders' Interest

Directors shall act in good faith in order to promote the objects of the Company for the benefit of its members as a whole, and in the best interests of the Company, its employees, the shareholders, the community and for the protection of environment through their supervisory role on the overall conduct of business and operations by the management.