

## CODE OF CONDUCT

This Code of Conduct is adopted to conduct the affairs of the company in a transparent and fair manner in accordance with the applicable laws & regulations.

### Applicability

This Code shall be applicable to all Directors and Management Staff immediately one level below the Board Members which includes all employees who are in the grade of Senior Manager & above and Company Secretary.

### Code

In performance of their duties & discharge of responsibilities, the directors and senior management should :

1. Abide by all the applicable laws & regulation governing the company including SEBI Insider Trading Regulations;
2. Deal with other in fair manner and shares, make available to other information as may be necessary to ensure proper conduct and sound operation of the company;
3. Avoid competing with the company;
4. Neither use the Company's assets for personal purpose/ gain nor does indulge or encourage any activity which would result in misuse of the Company's assets both tangible and intangible assets such as land, building, equipment, machinery, systems, material resources, intellectual property rights, goodwill, trademarks, patents, etc.,
5. not inappropriately disclose or use for personal gain confidential and proprietary information entrusted to them in the course of discharge of their duties & responsibilities except with the approval of Board or if such information is legally required or already in public domain;

Confidential Information includes all non public information that might be of use to company's competitor or any third part or harmful to the company if disclosed;

6. Not allow their personal interest interfere with the interest of the company and shall immediately disclose potential conflicts of interest that they may have regarding any matters ;
7. Not allow their personal interest interfere with their ability to perform their duties and responsibilities effectively and efficiently and shall make disclosures to the Board relating to all material financial and commercial transaction, where they have personal interest, that may have a potential conflict with the interest of the company at large.;
8. Not without the prior approval of the Board accept employment or a position of responsibility (such as a consultant or a director) with the competitor of the company nor provide 'freelance' services to them;
9. Annually sign a confirmation that they have read and will comply with this code. They will also affirm the compliance with the code on annual basis. All reported violations of this code will be investigated by the Board;
10. Senior Management should conduct themselves in professional, courteous and respectful manner to other in company meetings and dedicate their attention to decision-making. All the relevant material for the meeting should be distributed in advance by the concerned official and be reviewed by other in advance

This code does not attempt to be comprehensive or cover all possible situation but formulated as a guide for the conduct of the Board Members and Senior Management. It is not intended to and does not create any rights in any employee, shareholder or any other person. Any waiver of this Code must be approved by Board.

