

COMPANY CODE OF CONDUCT

Introduction:

This Code of Conduct helps, ensure compliance with legal requirements and management's principles of business, process and conduct.

The principles described in this Code of Conduct are general in nature, subject to continuous review and updation of our policies. Hence, this Code of Conduct is subject to modification and the Company may update the Code from time to time. The Company shall conduct its business affairs in tune with its internal policieS.

Financial reporting and records:

The Company shall prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the company conducts its business affairs.

Internal accounting and audit procedure shall fairly and accurately reflect all of the company's business transactions and disposition of assets. All required information shall be accessible to company auditors and other Authorised parties and government agencies. There shall be no willful omissions of any company transactions from the books and records, no advance income recognition, and no hidden bank account and funds.

Any willful material misrepresentation of and/or misinformation on the financial accounts and reports shall be regarded as a violation of this code, apart from inviting appropriate action under the relevant laws.

Ethical conduct:

Every employee of the company, which shall include whole-time Directors and the Managing Director, shall deal on behalf of the company with professionalism, honesty and integrity, as well as high moral and ethical standard. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

Whistle Blower Policy :

The company's whistle blower policy encourages disclosure in good faith of any wrongful conduct on a matter of general concern and protects the whistle blower from any adverse personnel action.

Shareholders:

The company shall be committed to enhance shareholders value and comply with all regulations and laws that govern shareholders' rights. The board of directors of the company shall duly and fairly inform its shareholders about all relevant aspects of the company's business, and disclose such information in accordance with the respective regulations and agreements.

Every employee shall be responsible for the implementation of and compliance with this code in his professional environment. Failure to adhere to the code could attract the most severe consequences, including termination.

Regulatory compliance:

Every employee of the company shall, in his or her business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which he or she operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the code, then the standards of the code shall prevail.

Securities transactions and confidential information:

An employee of the Company and his or her immediate family shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the company or the group, which is not in the public domain and thus constitutes insider information.

An employee of the Company shall not use or proliferate information which is not available to the investing public and which therefore constitutes insider information for making or giving advice on investment decisions on the securities of the company which such insider has obtained, like

- acquisition and divestiture of business of business units;
- financial information such as profits, earnings and dividends;
- announcement of new product introductions or developments;
- asset revaluations;
- investment decisions/plans;
- restructuring plans;
- major supply and delivery agreements'
- raising finance.