

CODE OF CONDUCT

CODE OF CONDUCT FOR THE DIRECTORS AND SENIOR MANAGEMENT PERSONNEL

The Board of Directors of the Company has adopted the following Code of Conduct for themselves and the Senior Executives of the Company.

1. Honesty & Integrity

- To Conduct themselves with honesty, integrity & fairness.
- To act in good faith, responsibly, with due diligence, in the best interest of the Company.

2. Conflict of Interest

- Not to engage in any business, relationship or activity, which is (or perceived to be) in conflict of interest with the company.
- Not to conduct business with relative or a firm where relative has a significant role.

3. Compliance

- To comply with all applicable laws, rules and regulations in letter & in spirit.
- To report, any possible violation of law, rules and regulations to the board, or the CEO/CFO/ED.
- Compliance Officer will be Mr. Bharat Somani, Executive Director.

4. Other Directorships

- Serving on other company's boards may create a potential conflict of interest. Therefore, to report/disclose such relationship to board.

5. Confidentiality of information

- All information to which has access and which is not in public domain, must be held in confidential.

6. Insider Trading

- Not to derive benefit/assist others to derive benefit by giving investment advice from access to information not in public domain.
- To comply with Insider Trading guidelines issued by SEBI and also the Company's Code of Conduct on Insider Trading.

7. Gifts & Donations

- Not to receive or offer, gifts, donations, remuneration, hospitality or illegal payments, which are intended to obtain business favours.
- Nominal gifts of commemorative nature, may be accepted & reported to the Board.

8. Protection of Company's Assets

- To be responsible for protection & use of Company's assets tangible as well as intangible by ensuring reasonable actions.
- To be used only for legitimate business purposes.