

CODE OF CONDUCT FOR DIRECTORS AND SENIOR MANAGEMENT

The Company is committed to ethical and lawful business practices and considers it as vital to achieve success and growth. Keeping this in mind a code of conduct has been evolved by the Board to be complied by the Directors and Senior Management of the Company. While it is not possible to anticipate every situation or circumstance that may arise, the code is intended to serve as a broad guide. The code may be amended, modified or withdrawn at any time subject to applicable laws. Every Director/Senior Management should exercise good judgment in compliance with the principles set out in this code.

Honesty and Integrity

All Directors/ Senior Management shall conduct their activities on behalf of the Company with honesty, integrity and fairness. They shall act in good faith and with due care, competence and diligence.

Compliance with Laws

The Company's policy is to comply with all applicable laws and regulations. All Directors and Senior Management shall ensure compliance related to their functions.

Reporting on the Directorships and conflict of interests

- a. There shall be no dealing or business by a Director with the Company or any of its subsidiary companies except with the approval/ratification by the Board.
- b. Directors will annually disclose about their Directorships with other companies as required under the Companies Act, 1956.
- c. When the Board is to decide on an issue in which a Director has an interest, the said Director shall abstain from voting and deliberation.

Competition and Business Dealings

The Company is fully committed to conduct its business in a fair and ethical manner. Director/Senior Management should uphold highest standards of integrity and ethics in all third party transactions. Every Director /Senior Management should deal fairly with the Company's Customers, Suppliers, Competitors and Employees.



Discrimination at work

The Company is firmly committed to providing equal opportunity in all aspects of employment and any illegal discrimination or harassment of any kind is prohibited.

Protection of Assets

Directors/Senior Management must endeavour to protect the Company's assets and information and should not misuse company's facilities. However, such facilities may be provided for personal use by policy or with permission. They should ensure as far as practicable to protect the assets of the Company from theft, damage, loss or misuse and ensure that the assets are used for business purposes only and for other purposes specifically approved by the Management.

Confidentiality

Any information concerning the Company's business, its customers, suppliers etc which is not in the public domain and to which the Directors/Senior Management have access or possess such information, must be considered confidential and held in confidence, unless authorized to do so and when disclosure is required as matter of law.

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