

## **Kiduja India Limited**

### **Code of Conduct**

The Kiduja India Limited's (hereinafter referred to as "the Company") Code of Conduct outlines commitment to each of the Company's stakeholders, including the communities in which it operates, and is guiding light when sometimes faced with business dilemmas that leave at ethical crossroads. This Code is guideline for decision-making that is paired with integrity.

This Code applies equally to all the directors, officers and employees of the Company. This Code also applies to the Company's partners, suppliers, agents or others acting on the Company's behalf.

#### **Equal Opportunity**

The Company provides equal opportunities to all the officers and employees of the Company and to all eligible applicants for employment in the company. There is no unfair discrimination on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.

When recruiting, developing and promoting the officers or employees, decisions will be based solely on performance, merit, competence and potential.

#### **Compliance with law**

The directors, officers and employees of the Company must protect our Company's legality. They should comply with all environmental, safety and fair dealing laws. They are expected to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

#### **Respect in the workplace**

The directors, officers and employees of the Company should respect their colleagues and subordinates. Kiduja India Limited does not allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

#### **Protection of Company Property**

The Company's property, whether tangible or intangible, should be treated with respect and care. There should not be any misuse of the Company equipment or use it frivolously. The directors, officers and employees of the Company should respect all kinds of incorporeal property which includes trademarks, copyright and other property (information, reports etc.) and it should be in use only to complete job duties.

#### **Bribery and corruption**

The Company's officers or the employees and others representing the Company, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business.

## **Gifts and Entertainment**

In connection with certain holidays and other occasions, it is customary in many parts of the world to give gifts of nominal value to customers, government officials and other parties who have a business relationship with the Company. However, the directors, officers and employees of the Company are required to be careful while doing so and it should not result in the violation of any regulations or the policies of the Company.

The following should be kept in mind when offering a gift to a customer, a government official or any third party:

- It is not done to obtain or retain business or gain an improper advantage in business;
- It is lawful under the laws of the country where the gift is being given and permitted under the policies of the client;
- It constitutes a bona fide promotion or goodwill expenditure;
- It is not in the form of cash;
- The gift is of nominal value (on an individual and aggregate basis);
- The gift is accurately recorded in the Company's books and records;

## **Professionalism**

1. The directors, officers or employees of the Company must show integrity and professionalism in the workplace.
2. All employees should fulfill their job duties with integrity and respect towards customers, stakeholders and the community.
3. Supervisors and managers mustn't abuse their authority. The Company expect them to delegate duties to their team members taking into account their competences and workload. Likewise, team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.
4. All employees must be open for communication with their colleagues, supervisors or team members.
5. The suppliers and service providers should be fairly and transparently selected.
6. All directors, officers or employees of the company must follow Vigil Mechanism / Whistle blower policy of the Company and report genuine concerns.

## **Insider trading**

The directors, officers or the employees of the Company must not indulge in any form of insider trading nor assist others, including immediate family, friends or business associates, to derive any benefit from access to and possession of price sensitive information that is not in the public domain. Such information would include information about our company, our group companies, our clients and our suppliers.

## **Ethics Officer**

The Board of Directors to select and designate Ethics Officer of the Company. The Ethics officer of the Company is responsible to oversee the proper implementation of this code and report to the Board of any event (actual or potential) of misconduct that is not reflective of the values and principles of the Company.

## **Disciplinary actions**

Kiduja India Limited may take disciplinary action against the violator who repeatedly or intentionally fails to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.
- Legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

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