



# **CENTURY ENKA LIMITED**

## **CODE OF CONDUCT FOR EMPLOYEES**

## **DOCUMENT CONTROL**

### **Document version**

This Code named as 'Code of Conduct for employees' is version 1.1.

### **Preparation/Revision history**

<b>Sr. No.</b>	<b>Date of preparation / modification</b>	<b>Version No.</b>	<b>Modified by</b>	<b>Reviewed and approved by</b>
1	18.05.2023	1.1 (All earlier versions were considered as 1.0)	Human Resource Department	Board of Directors

### **Issuing Authority**

The Code of Conduct for employees ('this Code') is approved by the Board of Directors ('the Board') of Century Enka Limited ('the Company').

### **Author and Responsible Official**

This Code is to be maintained and updated by way of additions, deletions, and modifications, only by the Human Resource Department in consultation with Legal and Secretarial Department. In case of any additions, deletions and modifications, this Code shall be reviewed by the Managing Director and subsequently approved by the Board.

Whenever this Code is amended, the version increases by one unit and the version is to be mentioned in the Document Control section.

### **Applicability and Usage**

This Code is applicable to every employee of the Company.

## **PREAMBLE & OBJECTIVE**

To ensure that there is a common minimum standard of professional behaviour, all employees are expected to adhere to the Code of Conduct. The main thrust of this Code is to ensure •compliance of all the applicable laws in letter and spirit •adopt ethical business practices in personal and corporate behaviour •deter wrongdoing in any business-related activities •adopt the highest standards of honesty, fairness, integrity, transparency & accountability the value of organization. This Code clearly lists the identifiable and non-negotiable set of actions/behaviour applicable to all employees across the Company.

## **CODE OF CONDUCT**

### **A. INTEGRITY IN PERSONAL CONDUCT**

- All employees shall abide by the laws of the land in whichever state or country they operate.
- All employees shall transact with others (including each other) in a fair and dignified manner, including being sensitive to employee diversity.
- Each employee shall be responsible to the best of his/her knowledge for fair representation and accuracy of information in the documents prepared or signed off by him/her.
- Each employee shall ensure that his/ her personal information provided to the organization is factual and accurate including prior work experience, educational qualification, compensation details, etc.
- Each employee shall be responsible to ensure that official expenses and personal claims, e.g., travel expenses, medical, LTA, HRA, vehicle running expenses, etc., shall be factual & correct.
- No employee shall use organization premises, infrastructure, time and resources for personal gain and parallel employment, e.g., share trading, blogging, printing of large number of personal papers/promotional materials etc.
- No employee shall receive any gift, consideration or favour in cash or kind for self (or any family members or relatives) from business partners or anyone with whom he/she has dealings on behalf of the Company.

*Clarification: Gifts of nominal value which are customary in nature may be given/ accepted on a special occasion. Employees are also expected not to receive "expensive gifts" from business partners at the time of social functions or occasions such as their children's wedding or their own personal anniversaries. However, small business gifts such as pen stands, leather items carrying logo of the gifting organization, sweets, dry fruits, chocolates at the time of Christmas, Diwali, New Year, etc., are exempt from this provision. The essential determinant here being: the size and cost of favour received and the obligation that it creates which puts our actions and decisions subsequently in a questionable light.*

## **B. CONDUCT AT WORK**

- All employees shall take decisions in the best interest of the Company and its business.
- All employees shall adhere to Company's policies, processes, systems and regulations in letter and spirit.
- All employees shall secure the physical, financial and intellectual property/ assets, interests of the Company by observing the discipline of internal controls.
- Each employee shall highlight deviations from stated organization processes and policies by an individual or a team to his/her manager.
- All employees shall ensure safe and secure working environment for themselves and others by observing discipline on internal guidelines.
- Each employee shall support the team/ organization by sharing knowledge, information and resources available with him/her or within his/her area of influence.
- Each employee, who comes across or handles confidential data about the organization, must maintain confidentiality of information (e.g., business development, acquisition plan, personal details, health record, family, performance, any unpublished price sensitive information related to securities etc.) and share the same only with authorized personnel for legitimate purposes or as required to be disclosed in accordance with applicable laws.
- Each manager shall take and communicate people related decisions fairly, objectively and only on need-to-know basis.
- Each employee shall promote cooperative and professional relationship of his/her team with other functions of the Company to promote its larger intent.
- No employee shall encourage giving bribe in cash or kind in order to secure illegitimate gain for the Company.
- All employees shall respect and protect the confidential information and intellectual property of other entities that are provided to us under agreement for specific use and shall pay appropriately for technology / software usage.

## **C. CONFLICT OF INTEREST**

- Concern employee shall ensure that all people related decision including hiring, allocation of job responsibilities, performance rating, promotion, etc., are free from bias and personal interest.
- Each employee shall ensure that if there is a perceived conflict of interest in a transaction, e.g., the vendor is 'personally known' to individual, he/ she shall inform his/her conflict of interest to the team/ individual concerned and his/her manager and refrain from being part of the decision-making process.
- No employee shall indulge in any action that may be construed as conflict of interest, e.g., Insider trading, Moonlighting, Personal investment in Business Partners/ Competition, etc.
- Each employee shall ensure that all policies and codes of the Company dealing with conflict of interest, if applicable, are adhered to.

#### **D. INTERFACE WITH EXTERNAL WORLD**

- All employees shall ensure that their interactions and transactions with customers and partners are transparent, professional, ethical and leave a positive image of the Company and its business.
- All employees shall ensure that commitments that are legitimately made are honoured.
- No employee shall encourage our business partners to indulge in unfair trade practices with their customers.
- No employee shall deride or criticize the Company, its business and policies at any public forum. Any such criticism shall be voiced within the organization through appropriate media/forums.
- Only official spokespersons shall represent the Company in the media. In case, the media attempts to talk to any employee either formally or informally regarding the Company and its business, the same should be redirected to the official spokespersons.
- Any disclosure of organization information informally to the media shall constitute violation of Code of Conduct.
- All employees shall ensure that their personal conduct in a public place and with public is dignified.
- All employees shall bring to attention, in case they notice infringement of intellectual property of the Company such as misuse of logo, misrepresentation of product, malicious propaganda, etc.

### **PERSONAL COMMITMENT TO COMPANY'S CODE OF CONDUCT**

Each employee of the Company shall commit to the Code of Conduct in the format annexed as Annexure-I on joining by signing a copy which shall be maintained in his/her personal file.

### **DISSEMINATION**

This Code shall be hosted on the website of the Company for accessibility to stakeholders of the Company and reference or web-link of this Code, may be disclosed in the reports as required by law from time to time.

### **INTERPRETATION OR MODIFICATION**

The Code will be amended or modified to align with any amendments made to the National & International conventions/directives/principles/standards or such other circulars, guidelines, standards or regulations issued by any statutory or regulatory authority or as and when deemed fit.

In the event of inconsistency of this Code with any statutory provisions, then the relevant provisions of such applicable law shall prevail upon the provisions of this Code.

## **ANNEXURE-I**

### **Personal commitment to Company's Code of Conduct**

I have read, understood and abide by the Code of Conduct of the Company. I am aware that any violation of this Code may subject me to disciplinary action, up to and including termination of my employment as well as legal action.

I agree to indemnify, defend, and hold harmless to the Company, and their officers and other employees from and against any damage, harm, and liability arising out of a breach of this Code by me or due to any negligence on my part.

Employee Name: \_\_\_\_\_

Employee F. No.: \_\_\_\_\_

Department: \_\_\_\_\_

Date:

(Signature)