

SINTEX PLASTICS TECHNOLOGY LIMITED

CODE OF CONDUCT FOR BOARD MEMBERS AND SENIOR MANAGEMENT OF SINTEX PLASTICS TECHNOLOGY LIMITED

1. Introduction

1.1. This Code of Conduct (“Code”) shall be called "*The Code of Conduct for Board Members and Senior Management*” of Sintex Plastics Technology Limited (“Company”).

2. Definitions

2.1. In this Code the following words shall have the following meanings:

2.1.1. “Board” shall mean the board of directors of the Company.

2.1.2. “Board Members” shall mean directors on the Board including the Whole-time Director and the Ordinary Directors and includes the Chairman of the Company.

2.1.3. “Ordinary Directors” shall mean directors on the Board who are not in whole time employment of the Company.

2.1.4. “Relative” shall have the meaning as defined in Section 2(77) of the Companies Act, 2013 and Rules made thereunder.

2.1.5. “Senior Management” shall mean personnel of the Company who are members of the core management team excluding the Board. This would include all members of the management team one level below the Executive Directors, including all functional heads.

2.1.6. “Whole-time Directors” shall be the directors on the Board who are in whole-time employment of the Company.

3. Applicability

3.1. The provisions of this Code shall be applicable to the following persons:

3.1.1. all Board Members; and

3.1.2. the Senior Management.

3.2. The Whole-time Directors and the Senior Management shall continue to comply with other applicable policies, rules and procedures of the Company for the time being in force.



4. Purpose

4.1. The main purpose of this Code is to create an environment where all the Board Members and Senior Management of the Company maintain an ethical standard and compliance to the ethical standards that are laid down. This Code will act as guideline to all to:

4.1.1. promote honest and ethical conduct by the Company;

4.1.2. maintain a corporate climate in which the integrity and dignity of each individual is valued;

4.1.3. assure compliance with laws, rules and regulations that govern the Company's business activities; and

4.1.4. assure the proper use of the Company's assets.

4.2. This Code does not specifically address every potential form of unacceptable conduct, and it is expected that the Board Members and Senior Management of the Company will exercise good judgment in compliance with the principles set out in this Code.

5. Conduct of Business

5.1. The Board Members and the Senior Management must conduct the business of the Company in an efficient and transparent manner and in accordance with its obligations to shareholders and other stakeholders.

5.2. The Board Members and the Senior Management shall act in accordance with the highest standard of honesty, integrity, fairness and ethical conduct while working for the Company as well as while representing the Company without allowing their independent judgment to be subordinated and fulfill fiduciary obligations.

5.3. In all cases, if one of the Board Members or the Senior Management are unsure about the appropriateness of an event or action, such Board Member or Senior Management shall seek the assistance in interpreting the requirements of this Code by contacting the Board.

6. Proper Use of the Company Assets

The Company assets shall be used only for the legitimate business purposes of the Company. The Board Members and the Senior Management shall not use the Company assets, confidential or proprietary information, or position for personal gain.

7. Confidential Information

Confidential information relating to the Company including any technical, operational or commercial information of the Company shall not be disclosed to anyone by the Board Members and the Senior Management. Such information is confidential and for the exclusive use of the Company.



8. Discrimination and Harassment

- 8.1. The Company is committed to providing a workplace free of discrimination and harassment based on race, color, religion, age, gender, national origin, disability, veteran status, or any other biases. It would be the endeavour of every Board Member and Senior Management to see that the work place is free from such environment.
- 8.2. If any officer or associate is discriminated, he/she may lodge a complaint of discrimination or harassment to the Chairman of the Company.

9. Sexual Harassment

Sexual harassment is illegal under Indian laws and a violation of the Company's policies. An employee engaging in sexual harassment will be subject to disciplinary action up to and including termination of employment and/or liable to indemnify the Company for the loss incurred by the Company on account of his such action/inaction and/or forfeiture of the termination benefits, if any (or to say to the extent of the loss suffered by the Company on account of his engaging in sexual harassment).

10. Political Contributions

Corporate funds, credit, property or services of the Company shall not be used, directly or indirectly, to support any political party or candidate for public office, or to support or oppose any ballot measure, without the prior approval of the Board.

11. Gifts and Other Benefits

No Board Member and/or Senior Management or a member of the Board Members' and/or Senior Management's immediate family, shall (directly or indirectly) solicit, accept or retain any gift, entertainment, trip, discount, service, or other benefit from any organization or person doing business or competing with the Company, other than (i) the modest gifts or entertainment as part of normal business courtesy and hospitality that would not influence, and would not reasonably appear to be capable of influencing, such person to act in any manner not in the best interest of the Company; or (ii) acceptance of a nominal benefit that has been disclosed to the Company.

12. Code for Independent Directors

The independent directors of the Company shall—

- (1) undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company;
- (2) seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the company;
- (3) strive to attend all meetings of the Board of Directors and of the Board committees of which he is a member;
- (4) participate constructively and actively in the committees of the Board in which they are

