



ETHICS POLICY

1. Purpose

This Ethics Policy establishes the principles and guidelines for ethical conduct within the organization. It ensures compliance with laws, promotes integrity, and prevents misconduct across all operations.

2. Scope

Applies to all employees, contractors, suppliers, and business partners associated with the organization.

3. Key Ethical Management Principles

3.1 Ethical Management and Anti-Corruption

- Employees must act with honesty, fairness, and transparency.
- Strictly prohibit bribery, kickbacks, and facilitation payments.
- Any gifts or hospitality must comply with company policy and be reported.

3.2 Preventing Conflict of Interest

- Employees must disclose any situation where personal interest could interfere with company interest.
- No employee should engage in outside business that competes with the organization without prior approval.

3.3 Prevention of Anti-Competitive Behaviour and Unfair Trade Practices

- Prohibit price-fixing, bid-rigging, market allocation, or other anti-competitive agreements.
- Commit to fair competition and compliance with antitrust laws.

3.4 Prevention of Counterfeit Parts

- Ensure sourcing only from approved and verified suppliers.
- Implement strict incoming quality checks and supplier audits to prevent counterfeit materials.



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3.5 Compliance with Export Restrictions

- Follow all international and domestic trade laws, sanctions, and embargoes.
- Screen customers and transactions to avoid prohibited exports.

3.6 Protection for Internal Whistleblowing and Anti-Retaliation

- Provide a confidential channel for employees to report unethical behaviour.
- Prohibit retaliation against whistle-blowers and ensure anonymity where requested.

3.7 Prevention of Money Laundering

- Conduct due diligence on customers and suppliers to prevent illegal financial activities.
- Report any suspicious transactions to the compliance team immediately.

3.8 Financial Responsibility (Accurate Record-Keeping)

- Maintain complete, accurate, and timely records for all financial transactions.
- Prohibit falsification or alteration of company records.

3.9 Information Disclosures

- Disclose all necessary financial and operational information accurately and promptly.
- Avoid misrepresentation, omission, or misleading statements in any reports.

3.10 Intellectual Property Protection

- Safeguard company IP, including patents, trademarks, copyrights, and trade secrets.
- Respect third-party IP and avoid unauthorized use.

4. Establishing a Code of Ethics

Currently, the company does **not have a formal Code of Ethics or guidelines**. This policy will serve as the foundation for:

- Drafting a formal **Code of Ethics & Conduct**.
- Training employees on ethical principles and compliance requirements.
- Developing reporting and monitoring mechanisms.



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5. Responsibilities

- **Management:** Ensure awareness, training, and enforcement.
- **Employees:** Comply with this policy and report any violations.
- **Compliance Team:** Monitor adherence and investigate misconduct.

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