

KIAN-M EXPORT LIMITED

CODE OF CONDUCT

KIAN-M EXPORT LIMITED

Dear colleagues,

The legacy of KIAN-M Export Limited is built on dedication, responsibility, and an unwavering commitment to ethical business practices. Since our inception, we have believed that integrity, transparency, respect, and accountability are the foundations of sustainable growth and long-term relationships.

As our organization continues to grow and expand across markets and geographies, it becomes increasingly important to uphold a unified standard of professional conduct. In an evolving global business environment, with diverse cultures, regulations, and expectations, this Code of Conduct serves as a guiding framework for all employees, partners, and stakeholders associated with KIAN-M Export Limited.

This Code reflects our commitment to doing business responsibly and ethically while fostering trust, fairness, and mutual respect in every interaction. It outlines the principles and behaviours expected from every individual representing the company and reinforces our responsibility toward our customers, employees, business partners, communities, and society at large.

While this Code provides guidance for many workplace situations, it may not address every circumstance or challenge one may encounter. In situations of uncertainty, employees are encouraged to seek guidance from their reporting managers or Human Resources representatives to ensure that decisions align with the values and principles of the organization.

Understanding, embracing, and practicing these standards will help us strengthen the culture of excellence and integrity that defines KIAN-M Export Limited. Together, let us continue building an organization that inspires trust, creates opportunities, and sets benchmarks for responsible business conduct.

Regards,

RAJESHBHAI PARSHOTAM MALAVIYA

CODE OF CONDUCT

SCOPE

- *Kian-M Export Limited ("the Company") is committed to maintaining the highest standards of ethics, integrity, transparency, and professionalism in all its business activities. The Company strictly prohibits fraud, bribery, corruption, and any unethical business practice.*
- *This Code of Conduct is not merely a set of rules created for compliance purposes; it reflects our shared values, principles, and commitment to responsible business practices. It represents the culture and ethical foundation on which Company operates.*
- *This Code outlines the standards of behaviour expected in our interactions with employees, customers, suppliers, service providers, contractors, consultants, business partners, stakeholders, government authorities, and the communities in which we operate. It also reinforces our responsibility toward environmental sustainability and fair business conduct.*
- *Every individual associated with Kian-M Export Limited, whether directly or indirectly employed or engaged, is expected to act responsibly and uphold the principles stated in this Code. Any violation of the Code may result in disciplinary action in accordance with company policies, contractual obligations, and applicable laws.*
- *Compliance with this Code is the responsibility of all employees and associated persons. By following these principles in both letter and spirit, we strengthen the trust placed in us by our stakeholders and contribute to building a culture of accountability, respect, and integrity.*
- *In this Code, the terms "we," "us," or "our" refer to Kian-M Export Limited, including its directors, officers, employees, representatives, and all individuals working on behalf of the Company, as applicable within the context.*
- *The term "Company" refers to Kian-M Export Limited and any associated entities, divisions, or business operations managed under its authority.*

OUR PURPOSE STATEMENT

Kian-M Export Limited has always upheld strong ethical values as the foundation of its business conduct. Honesty, integrity, accountability, and excellence remain our enduring commitment to all our stakeholders. As we continue to grow in an increasingly dynamic and competitive business environment, it is essential to clearly define and uphold the standards of professional behaviour expected from all of us.

The Kian-M Export Limited Code of Conduct is a living document that reflects our commitment to responsible business practices and our vision of creating sustainable value for our stakeholders. It embodies the principles that guide our decisions, actions, and relationships every day.

The guiding principles by which Kian-M Export Limited operates are:

- **We Think Beyond Boundaries**
We encourage innovation, creativity, and forward thinking. We challenge conventional approaches and continuously seek better solutions that drive growth and create opportunities.
- **We Deliver with Commitment**
We are dedicated to fulfilling our responsibilities with determination, professionalism, and efficiency. We remain resilient in challenging situations and consistently strive to achieve excellence.
- **We Stay Positive and Progressive**
We believe optimism drives progress. Our positive attitude, entrepreneurial spirit, and enthusiasm empower us to adapt, evolve, and grow in a changing world.

- **We Always Do What Is Right**

Integrity is at the core of everything we do. We maintain the highest ethical standards and never compromise our values while pursuing our business goals.

- **We Create Value Beyond Business**

We believe business success is closely connected to the well-being of society. We strive to create meaningful value for our customers, employees, partners, communities, and the environment through responsible and sustainable practices.

EMPLOYEE RESPONSIBILITIES

- *Demonstrate the core values and ethical principles of KIAN-M Export Limited in all day-to-day business activities and professional interactions.*
- *Become familiar with and adhere to the Company's Code of Conduct, policies, procedures, and applicable guidelines.*
- *Comply with all applicable laws, regulations, and company policies in every jurisdiction and business area in which the employee operates. In case of any uncertainty or conflict between legal requirements and company practices, employees should seek guidance from the Human Resources or Legal Department. Any deviation or non-compliance must be promptly reported to the appropriate authority within the Company.*
- *Never request, authorize, or permit any third party — including agents, consultants, suppliers, contractors, or representatives — to engage in any activity or conduct that employees of KIAN-M Export Limited are prohibited from undertaking.*
- *Promptly raise questions, concerns, or suspected violations relating to unethical conduct, business practices, or non-compliance with applicable laws or company policies with the designated management personnel or appropriate authorities within the Company.*

MANAGER RESPONSIBILITIES

Managers have a profound effect on how their employees conduct business. Typically, employees learn from their managers which business practices are considered proper or improper. Therefore, each manager has additional responsibilities to set highest integrity standards in personal actions by:

- *Communicating regularly and clearly about responsible business practices and their alignment with core company values.*
- *Communicating to employees the manager's availability to assist them with ethics and compliance questions, or reports of possible misconduct, without fear of retaliation.*
- *Treating all employees fairly. Also, helping employees understand that being fair does not always mean treating each employee exactly the same.*
- *Appropriately addressing an employee's report of suspected misconduct.*
- *When an employee raises a question or concern that may be difficult for the manager to resolve, do seek assistance.*
- *Appropriately responding to employees' conflict of interest situations to ensure business decisions are made in the best interest of the Company.*

POLICY DETAILS

A. OUR COMMITMENT TOWARDS OUR EMPLOYEES:

Equal Opportunity Employer

1. *Company is committed to the principle of equal employment opportunity for all employees and to providing employees with a work environment free of discrimination and harassment*
2. *All employment decisions at company are based on business needs, job requirements, individual qualifications, performance, merit, competence and potential without regard to race, colour, religion or belief, national, social or ethnic origin, gender (including pregnancy), age, physical, mental or sensory disability, HIV status, sexual orientation, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information,*

family or parental status, or any other status protected by the laws or regulations in the locations where we operate. We have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this code. These policies provide clear terms of employment, training, development and performance management.

Upholding Human Rights

As an organization it is of utmost importance that we undertake our business with honesty and integrity and ensure a safe and conducive work environment for everyone, free of discrimination and harassment. We are committed to uphold and respect human rights across all our operations and businesses and are guided by the fundamental principles of human rights.

3. *We do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.*
4. *We do not employ children at our workplaces.*

Kickbacks, Anti - Bribery and Anti - Corruption

5. *Bribes and kickbacks are illegal in almost every country. Any offer of a payment or anything of value to influence a business decision or government action could be considered a bribe or kickback. An employee must never offer, request, accept, or indicate willingness to accept such a payment. Use caution, as even some non-cash gifts could be perceived as bribes. Unofficial fees to government officials, known as 'facilitating' or 'grease' payments, are strictly prohibited.*
6. *Our employees and those representing us, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or benefits that are intended or perceived to obtain undue favours for the conduct of our business.*

Unlawful Harassment

Unlawful harassment can take several forms, including verbal, visual or physical conduct that creates an offensive, hostile or intimidating work environment. Conduct directed at or by the company's employee, or an employee of the company's customers, suppliers or business associates that can contribute to unlawful harassment includes, but is not limited to:

7. *Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments*
8. *Visual conduct such as derogatory and/or sexually oriented posters, photography, cartoons, drawings or gestures*
9. *Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work because of gender, race or any other protected characteristic*
10. *Threats and demands for sexual favours as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours*
11. *Retaliation for having reported or threatened to report harassment*
12. *Employees who are aware of any suspected discrimination or harassment should report the matter to Human Resources.*

Dignity and Respect

13. *Company can realize its vision only with full commitment and cooperation of our diverse workforce. Achieving success for all stakeholders will come only through respecting one another, valuing each of our colleagues' contributions, and treating each person fairly.*
14. *Our leaders shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy.*
15. *Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether gender-based, sexual, physical, verbal or psychological.*
16. *We respect our employees' right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.*
17. *We have clear and fair disciplinary procedures, which necessarily include an employee's right to*

be heard.

Gifts and hospitality

18. *To prevent conflicts relating to gift giving/receiving, it is often helpful to discuss what is allowed with the Group HR Head or Group Ethics Officer at the start of a business relationship.*
19. *We are committed to strengthening all of our relationships with customers, suppliers, and other business associates. We do not provide/accept gifts or entertainment to improperly influence other persons' business decisions, and we do not make illegal or unethical payments. In all situations, we must exercise good judgment and moderation to avoid the appearance of inappropriate conduct.*

Freedom of Association

20. *We recognize that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our company. Our employees must notify the Group HR Head and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this code and in accordance with applicable company policies and law.*

Assignment outside Employment

The following are potential conflicts of interest related to an employee's activities separate from the company:

21. *Serving as a director, officer, partner, consultant, manager, or in any technical capacity or any key role with an organization, even if only part of the time, that conducts, or is likely to conduct, business with or competes with the company.*
22. *Acting as a broker or other intermediary for another party in transactions currently or potentially involving the company or its interests.*
23. *Having any other employment, including running a separate business*
24. *Making presentations or submitting articles or other writings related to the employee's professional area. Before agreeing to such activity, the employee's manager should review the information and assess the situation. Also, the employee should inquire as to whether the business unit has a document or presentation review policy.*

All the above activities (as mentioned in point 21 to 24) should not interfere with the employee's job performance.

Use of Company's Resources

25. *Using company position or title in connection with an outside activity that may infer the company's sponsorship or support.*
26. *Using the company's property or information or one's position with the company for personal gain.*
27. *Using any company supplies or facilities in connection with an outside activity, unless approved by the employee's manager.*
28. *Using company time for outside business or activities.*
29. *Employees should review any potential situations with their manager before they occur to ensure that these situations are not likely to become actual conflicts*

Conflicts of Interest

30. *Our employees and executive directors shall always act in the interest of our company and ensure that any business or personal association, including close personal relationships, which they may have, does not create a conflict of interest with their roles and duties in our company or its operations. Further, our employees and executive directors shall not engage in any business, relationship or activity, which might conflict with the interest of our company or group companies.*
31. *Should any actual or potential conflicts of interest arise, the concerned person must immediately report such conflicts and seek approvals as required by applicable law and company policy. The competent authority shall revert to the employee within a reasonable time as defined in our company's policy, so as to enable the concerned employee to take necessary action as advised to resolve or avoid the conflict in an expeditious manner.*
32. *In the case of all employees other than Executive Directors, the Chief Executive Officer/Managing Director shall be the competent authority, who in turn shall report such cases to the Board of Directors and such disclosures shall be reviewed by the appropriate management authority. In*

case of the Chief Executive Officer/Managing Director and Executive Directors, the Board of Directors of our company shall be the competent authority.

33. Notwithstanding such or any other instance of conflict of interest that exists due to historical reasons, adequate and full disclosure by interested employees shall be made to our company's management. At the time of appointment in our company, our employees and executive directors shall make full disclosure to the competent authority, of any interest leading to an actual or potential conflict that such persons or their immediate family (including parents, siblings, spouse, partner, children) or persons with whom they enjoy close personal relationships, may have in a family business or a company or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with our company. For all new joiners, such declaration shall be made within 30 days of joining as per the form attached in the joining kit.
34. All employees of the company shall be required to disclose any conflict of interest within 90 days from the date of policy to the Compliance Officer.
35. If there is a failure to make the required disclosure and our management becomes aware of an instance of conflict of interest that ought to have been disclosed by an employee or Executive Director, our management shall take a serious view of the matter and consider suitable disciplinary action as per the terms of employment. In all such matters, we shall follow clear and fair disciplinary procedures, respecting the employee's right to be heard.

Loans & Guarantees

Loans and guarantees to employees by the Company could constitute improper personal benefits depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of obligations of, any director or executive officer or their family members are governed by the Law.

Integrity of Information and Company Assets

Company is committed to managing its assets and resources in a responsible manner. It does this on behalf of its shareholders and to protect employees, customers, products, property and information. This is achieved through line accountability that clarifies to every individual their role in minimizing losses and disruption, and safeguarding Company integrity and reputation. This Policy, associated standards and procedures specify the requirements for the management of assets and resources; the maintenance of internal financial, regulatory and operational controls; the management of significant risks; and the protection of the business in the face of significant events.

- We must manage assets efficiently and effectively so that the Company realizes their full value and complies with its obligations;
- We must identify and manage our information assets using good information practice;
- We must operate and maintain a robust internal financial, regulatory and operational control system that is designed to promote efficiency, prevent fraud and help ensure the reliability of financial statements and compliance with applicable laws and standards;
- We must identify, priorities, manage and report risks to Company assets, employees or customers so that we achieve our business objectives, comply with legal requirements and safeguard shareholder value;
- We must be prepared to the fullest extent practicable to respond to significant events so that our critical business processes are maintained.

36. Managing Information as an asset

- For the purposes of this policy information is defined as "information that the employee creates or handles, in all formats including physical, electronic or verbal, or the use of other knowledge in the course of Company business".

- a. **Accountability:** Accountable people recognizing information as an asset. By agreeing and maintaining clear ownership and accountability for information we ensure appropriate levels of personal responsibility and management oversight throughout the information lifecycle.
- b. **Integrity:** Accurate information with trustworthy sources. By making sure that information is accurate, relevant and trustworthy we ensure it supports the integrity of decision making and end-to-end business processes.
- c. **Retention:** Keep what is needed, dispose of the rest. By keeping only information that supports well understood compliance and business objectives and disposing of what we no longer need in a timely way, we retain the information assets we need without

- incurring unnecessary business risk and cost.*
- d. *Compliance: Standards are understood and met. By assuring that information is compliant with the Company's legal, regulatory, fiscal, ethical and operational obligations we help to maintain our license to operate and achieve our reputational goals.*
- e. *Availability: Accessible information enabling people. By making the right information available to the right people, at the right time, we improve our effectiveness and the quality of decision-making and enhance our ability to innovate for business value.*
- f. *Protection: Information is safeguarded through processes that are secure and understood. By agreeing and maintaining the appropriate access and other controls for information we ensure that the varied interests of relevant stakeholders including customers, shareholders and employees are protected.*

37. Records and Reporting

All relevant information produced by the company, is considered as records, regardless of how the information is stored and maintained. Examples of records, not limited to, include financial, accounting, technical, sales reports; production information; research and development notes; personnel files; Safety, Health and Environmental (SHE) information; vendor and partner contracts; marketing information; electronic information and business plans. Employees should ensure that all company accounts and records:

- a. *Are maintained accurately. The records should also clearly describe and identify relevant facts or true nature of the business transactions, assets, liabilities or equities.*
- b. *Are documented properly, classified timely and entries are recorded in books of accounts, in compliance with company adopted accounting principles.*
- c. *Related to accounting transactions and financial reporting comply with company accounting policies and generally accepted accounting principles and standards.*

Employees must not intentionally record entries that are false, distorted, misleading, misdirected, deliberately incomplete or suppressed. Improper accounting and documentation and fraudulent financial reporting will violate company policies, legal and regulatory accounting standards. Such intentional actions will attract penalties, which will be civil and criminal in nature.

Employees should share the responsibility of maintaining and complying with all applicable internal controls laid by the company. These internal controls, viz. policies related to accounting, personnel, information security, etc., ensure proper use and protection of all business assets, including electronic and static information, accuracy and reliability of financial records and reports.

All Company employees, including directors have to comply with all applicable anti-money laundering, anti-fraud and anti-corruption laws and follow established processes for prevention of any breach of applicable laws.

38. Company assets:

- a. *Proper handling and protection with adequate care of company assets/resources is a fundamental responsibility of each employee. While limited personal use of certain resources is sometimes permissible, employees should not take this privilege for granted as permanent, and pursue the same at all times or assume that they have a right to privacy, when using these resources.*
- b. *Company assets include, but are not limited to laptops, computers, mobile and related equipment, local area and wide area networks (including Internet access), information assets including electronic and static, emails, business software, business applications, databases, online storage, audio, video, physical and electronic data, including storage on cloud, records maintained, (which may be stored and/or in-use), telephone and voicemail systems, and personal digital devices. These also include intellectual properties, such as logos, brands, registered company names and associated website*

domain names, inventions and other relevant and applicable copyrights, owned by company.

- c. Employees must safeguard their allocated resources and protect critical company data stored on them. In addition, because of the sensitive information, these devices may contain, employees must follow all applicable company policies, including IT, Information Security and follow all procedures regarding computer protection and encryption, thereby protecting them from theft, abuse and fraud.*
- d. Employees should comply with the following responsibilities:*
 - i. Acquisition of IT assets: Use good and sensible judgment, when obtaining assets for the company's use. Acquire only those assets, which company is permitted to have and assists in growth of business. Finally, ensure that company gets a fair price, when purchasing assets, such as supplies and raw materials, capital machinery, information and technology assets etc.*
 - ii. Use and handling of IT assets: Use extreme care, when working with company provided assets to ensure that these critical resources do not lose their market value due to misuse or mishandle.*
 - iii. Safeguarding IT assets: Protect company assets from misuse by others, theft or mishandling. Company property and information should be stored in secure locations to prevent unauthorized and un-willful access.*
 - iv. Sharing of information on IT assets: Electronic information on company assets should be shared with people or entities outside of the company, only when authorized and when doing so, it should not compromise the value of asset or breach of applicable IT laws, company IT policy or breach of applicable regulations of the said country.*
 - v. Follow procedures: Comply with installed security programs to safeguard physical property and other assets against unauthorized use or removal, as well as against loss due to criminal act or breach of trust.*
 - vi. Disposal of assets: Disposal of company assets, including IT assets, only after receiving proper authorization from management, and should be in line with IT policy and such accounting policies laid by the accounts department of company.*
 - vii. Misuse of assets: Help protect against misuse of company assets by following applicable whistle blower policies and raising concerns, at the right time and highlighting misuse of company assets.*

39. Company Records:

Employees accountable for the management of Company records created during the course of our business activities throughout their entire lifecycle, including creation, use, management, storage and retrieval, archiving and disposal. It is the Company's policy to: value records as corporate assets; retain records required by law or regulation or having business or historical value; manage records efficiently; protect and hold records according to company standards; and dispose of records at the appropriate time.

- a. Recorded information represents official business records regardless of media form or other format characteristics, when created or received by the Company and considered as evidence of its functions, decisions, policies, operations and other activities.*
- b. Records are important corporate assets to be safeguarded. Company records must have the appropriate level of protection from unauthorized use, disclosure, damage or loss.*
- c. Adherence to efficient records management practices will help assure Company information is protected, accurate, useful and readily accessible whenever it is needed.*
- d. All company's employees shall not make any willful omissions or material misrepresentation that would compromise the integrity of our records, internal or external communications and reports, including the financial statements, acquired in the course of conduct of his/her duties, to his/her personal advantage or to the advantage of his relatives or friends.*
- e. All company's employees and directors shall seek proper authorization from management, prior to disclosing company or business-related information, and such disclosures shall be made in accordance with the company's media and communication policy. This includes disclosures through any forum or media, including all social media*

tools, either from web or mobile.

- f. All company's employees shall ensure that the data/information, including emails, documents, databases, audios, videos, storage of electronic media and company IP content furnished by him/her to any person within the company or any outside person/authority has integrity and is dependable and that such data/information is not in conflict with any fact(s) or figure(s) about the company, which he/she, as a person of reasonable prudence, is supposed to be aware of or could have made himself/herself aware of, by applying reasonable judgmental care before the dissemination of such data/information. They should ensure it is in accordance with applicable company policies on information security, Information Technology Act 2000 and subsequent IT Amendment Act 2008.*
- g. Our employees and directors shall respect and protect all confidential information and intellectual property of our company. This includes advantage acquired or gained by using fair means, including dealing in the shares/securities of the company, confidential/insider information, inter alia, includes the following:*
 - i. Financial information, such as profits, dividends and cash flows, issue of securities, such as bonus, rights etc., customer/supplier contact details, commercial information, bank details and other financial information.*
 - ii. Major events, such as acquisitions, divestments, launch of new products or services, Internal MIS reports for Board members, etc.*
 - iii. Restructuring plans, decisions regarding appointments of key personnel, etc.*
 - iv. Company business information in form of electronic media, includes internal emails, documents, databases, audio, video, supplier information, vide using USB pen drives, storage through external cloud storage and other prevalent means of data sharing practices.*
 - v. Any price sensitive information.*
 - vi. Our employees shall promptly report the loss, theft or destruction of any confidential information or intellectual property and data of our company or that of any third party, within 24 hours of such incident coming to their knowledge.*

Drug, Alcohol and Weapon Abuse

- 40. To meet our responsibilities to employees, customers and investors, the Company must maintain a healthy and productive work environment. Substance abuse, or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs and alcohol while at work is absolutely prohibited.*
- 41. The possession and / or use of weapons / firearms or ammunition on company premises or while conducting the business of the Company is strictly prohibited, except with the prior permission of the company or as otherwise required by applicable law. Possession of a weapon can be authorized only for security personnel when this possession is determined necessary to secure the safety and security of Company's staff and employees. The provision of written permission by the Company, however, is not meant to be an indication that the Company claims any responsibility or liability for a person's possession and / or use of a weapon / firearm or ammunition and does not authorize the person to possess and / or use such weapon / firearm or ammunition on the Company's behalf. In addition to obtaining written permission from the Company, any person in possession of a weapon / firearm or ammunition on Company premises, is solely responsible for obtaining, and must have and maintain, any and all licenses / permissions that are required by applicable laws and regulations in the relevant jurisdiction. The person in possession of the weapons / firearms or ammunition maintains sole responsibility for ensuring that their possession and / or use of such weapons / firearms or ammunition is in conformance will all such laws and regulations.*

Insider Trading

- 42. Any information that is not known to the general public at large and which may impact the share price of our company, if disclosed, is considered to be inside information. Our employees 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 also include information about our group companies, our clients and our suppliers. Every employee, having access to price sensitive information, who wishes to trade in the securities of the company needs to take specific approval from the Secretarial Department. Please refer separate policy on insider trading for further details.

Employee Separation

Employees who leave the company must:

- 43. Promptly return all company assets, including physical materials and company's information assets, such as computers, mobile phones, calling cards, access cards, keys, business cards and electronic storage media.*
- 44. Not make or take copies of information related to company when departing.*
- 45. Not disclose non-public information related to company to others even after leaving the company.*
- 46. Failure to comply with this obligation may result in severe civil and criminal penalties.*

Safety & Health

We prioritize safety at all the stages of our business activities and are committed to provide safe and healthy workplace to all our employees and other stakeholders than can be impacted by our business. All employees are bound by our Safety policy and would comply with the procedures set out at every facility. We expect full commitment from all our employees and business partners in ensuring safety in everything we do.

B. OUR COMMITMENT TOWARDS OUR CUSTOMERS:

Products and Services

- 1. We are committed to supplying world-class products and services that meet all applicable standards.*
- 2. The products and services we offer shall comply with applicable laws, including product packaging, labelling and after-sales service obligations.*
- 3. We shall market our products and services on their own merit and not make unfair or misleading statements about the products and services of our competitors.*
- 4. We shall comply with all relevant export controls or trade sanctions in the course of our business.*

Fair dealings with suppliers, customers and competition

- 5. Fair Dealings With Suppliers:*
 - a. Our suppliers are valued partners in the success of our business. Our relationships with them is characterized by honesty and fairness. Suppliers are selected on a competitive basis based on total value, which includes quality, service, technology and price.*
 - b. Terms and conditions defining our relationship with suppliers are communicated early in the supplier selection process and agreements to such terms and conditions, or any acceptable modifications, are reached before work begins.*
 - c. Included in these standard terms and conditions are company's policies regarding payment terms, confidentiality, and the use of intellectual property, worker health, safety and labour practices, and environmental requirements.*
 - d. Supplier Diversity:*
 - i. Supplier Diversity is a fundamental business strategy for company.*
 - ii. Our consumers, customers and suppliers become more and more diverse every day, so our success depends on our ability to understand diverse consumers' needs and to work effectively with customers and suppliers around the world.*
 - iii. Diversity is the uniqueness that everyone – from suppliers to employees to corporate officers – brings to fulfil company's Purpose, Values and Principles. We will continue to expand and build our Supplier Diversity results.*
- 6. Fair Dealings with Customers:*
 - e. Company recognizes that our customers have individual needs and expectations representing unique opportunities for mutual success. Company treats all customers equitably and does not give any customer an unfair advantage over another competing*

customer.

- f. The Company does not discriminate by customer size, type, channel, or business strategy
7. **Fair Competition**
We believe in competing fairly because we all benefit from fair, free and open markets. We compete strictly on the merits of our products and services and make no attempts to restrain or limit trade.
- g. Company's goal is to win consumers for its products by virtue of the products quality and value, and not by creating unfair disadvantage for its competitors
- h. We never discuss such matters as prices, pricing strategies, product or marketing plans, or terms of sale with competitors. Should a prohibited subject come up during the course of a trade association or other meeting, we must leave the meeting and inform our leadership or legal counsel.
- i. We do not enter into agreements with our competitors concerning prices, production volumes, customers or sales territories
- j. We do not link purchase of one product to another or compel suppliers to buy from us to retain their company's business.
- k. We do not disparage the products or services of a competitor.
- l. We collect competitive information through proper public or other lawful channels but do not use information that was obtained illegally or improperly by others, including through misrepresentation, invasion of property or privacy, or coercion.
- m. We support the development and operation of competitive open markets and the liberalization of trade and investment in each country and market in which we operate.
- n. We shall not enter into any activity constituting anti-competitive behaviour, such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors.

We shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

Payments for Products and Services

8. Sales-related commissions, rebates, discounts, credits and allowances are customary business payments. Employees should avoid illegal or unethical payments and must comply with applicable currency exchange controls and tax regulations.
9. Payments that the company makes or receives should be:
- a. Reasonable in value, relative to the goods or services provided and to industry norms.
- b. Competitively justified.
- c. Properly documented, such as in a negotiated agreement. The documentation should clearly define the nature and purpose of the transaction. (When an agreement is not practical, the approving business or function should prepare and file a memorandum that explains the payment. The legal department should review this memorandum.)
- d. Made by cheque, bank transfer or credit note to the business entity listed on the original sales agreement or sales invoice, as per payment terms defined in the agreement.
- e. Payable to the business entity, not its individual officers, employees, or agents, or payable to another business entity.
- f. Prepared and sent only to the business or its designated entity's place of business or bank account, and the relevant country as listed on the original sales agreement or sales invoice.
- g. Free of any falsification, misrepresentation, or deliberate overbilling in any document (including invoices, consular documents, letters of credit, etc.). This includes suppression or omission of documents or of information in documents, and deliberate misdirection of documents.
- h. Charged to the business entity or product benefiting from the payment. The company should provide full visibility regarding any payments and should not charge the payment to a non-related account. Otherwise, this action could be perceived as trying to hide the expense from proper scrutiny.
- i. In accordance with standard, written trade terms, including paid commissions, rebates, credits, discounts or allowances.
- j. The person approving each transaction is responsible for understanding the full

transaction to ensure it is appropriate to the situation and complies with company policy.

- k. *Never make payments that may appear to violate tax, exchange control or other laws. If unsure of a payment's legality, or to request an exception to this policy, seek approval from the Legal department and Chief Financial Officer.*

Dealings with customers

- 10. *Our dealings with our customers shall be professional, fair and transparent.*
- 11. *We respect our customers' right to privacy in relation to their personal data. We shall safeguard our customers' personal data, in accordance with applicable law.*

Business across borders

- 12. *Each location where company conducts business may have distinct laws and regulations and unique ways of transacting business. We must abide by local customs while we honour our company core values and uphold our standards. Therefore, each of us must understand the relevant laws and regulations that help safeguard the reputation of company as a responsible global conglomerate.*

- a. *Export control:*

Employees need to understand and follow national and multinational laws and other rules for exporting products, services and technologies from one country to another. Export rules not only pertain to transferring products between countries but may also restrict the following:

- i. *Using business knowledge outside of the employee's country, such as when providing technical assistance to others.*
- ii. *Transferring technical data to someone in another country, such as through the internet, e-mail, conversations, meetings and database access. This restriction applies to sharing information with other company employees as well as non-employees.*
- iii. *Transporting company assets with certain technology, such as a computer an employee takes on a business trip to another country.*

Some exports may require a government export license. In certain circumstances, export control laws may not allow companies or individuals to directly or indirectly deal with particular countries, companies, or individuals. These rules apply to transactions among company, its affiliates, joint ventures, and subsidiaries, and between company and other companies.

At times, export control laws in certain regions may conflict. To avoid problems, employees should consult the legal team as early as possible about local laws on exporting products, services, and technology.

- b. *Customs and import:*

Customs rules safeguard each country's domestic industries, homeland security, and trading rights, while also preventing prohibited items from entering a country. These rules apply to transactions between company and its affiliates, joint ventures, and subsidiaries, and between company and outside companies. The rules require company to determine the correct classification, value, and country of origin of all of its imports. Employees must be able to demonstrate, with proper documentation, that company exercised reasonable care to ensure its imports comply with all applicable laws. This step requires that, at minimum, employees report complete, accurate, and detailed information regarding every imported product, its places of manufacture, and its full cost. Virtually all countries in which company operates have these requirements.

C. OUR COMMITMENT TOWARDS OUR FINANCIAL STAKEHOLDERS

- 1. *We are committed to enhancing shareholder value and complying with laws and regulations that govern shareholder rights.*
- 2. *We shall inform our financial stakeholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable law and agreements.*
- 3. *We shall keep accurate records of our activities and shall adhere to disclosure standards in accordance with applicable law and industry standards.*

D. OUR COMMITMENT TOWARDS OUR VALUE CHAIN PARTNERS

1. *We shall select our suppliers and service providers fairly and transparently.*
2. *We seek to work with suppliers and service providers who can demonstrate that they share similar values. We expect them to adopt ethical standards comparable to our own.*
3. *Our suppliers and service providers shall represent our company only with duly authorised written permission from our company. They are expected to abide by the code in their interactions with, and on behalf of us, including respecting the confidentiality of information shared with them.*

E. OUR COMMITMENT TOWARDS THE COMMUNITIES AND ENVIRONMENT

Communities:

1. *Company and its employees have a long-standing commitment to being good citizens and neighbors in all the places where we do business around the world. We believe we have a responsibility to society to use its resources – money, people and energy – wisely.*
2. *We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.*
3. *We engage with the community and other stakeholders to minimise any adverse impact that our business operations may have on the local community and the environment.*
4. *We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this code, where applicable, and in particular the 'Conflicts of Interest' clause are followed.*

Charitable Contributions

We have always looked at the upliftment of the society and contributed towards the betterment of the environment. We support various causes such as education and research, social welfare, disaster relief and other similar social causes. However, the following should be kept in mind before making any contribution.

- a) *The recipient is a registered, tax-paying, recognized organization.*
- b) *The contributions are permissible under applicable local laws.*
- c) *Contributions are made without demand or expectation of business return.*
- d) *Beneficiaries of such contributions should not be related to the directors or executive officers of Company or any of the group companies under Company.*
- e) *Contributions shall not be made to the private account of an individual.*
- f) *Any amounts contributed or donations made towards charitable causes shall be fairly and accurately reflected in Company's books of accounts.*

If any employee wishes to contribute, the same shall be done in the personal capacity and shall not represent the company.

Environment:

5. *In the production and sale of our products and services, we strive for environmental sustainability and comply with all applicable laws and regulations.*
6. *We seek to prevent the wasteful use of natural resources and are committed to improving the environment, particularly with regard to the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials. We shall endeavour to offset the effect of climate change in our activities.*

F. OUR COMMITMENT TOWARDS THE GOVERNMENTS

It is COMPANY's policy to comply fully with all applicable laws and regulations governing contact and dealings with government employees and public officials, and to adhere to high ethical, moral and legal standards of business conduct.

Political non-alignment:

We shall act in accordance with the constitution and governance systems of the countries in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any system of government.

The company's funds or assets shall not be used as contribution for political campaigns or political practices under any circumstances without the prior written approval of the directors.

Employees must always make it clear that their views and actions are their own and not those of the Company and employees must never use Company resources to support their personal choice of political parties, causes or candidates.

If our work includes meetings with government, elected officials, all of which might be construed as 'lobbying', we must be aware that such activities are regulated. We should not claim to represent our Company at such meetings unless we are specifically designated by the Company to do so.

If you have any questions concerning government relations, contact company's legal department.

GRIEVANCE REDRESSAL

Getting Assistance & Raising Concerns

1. *We encourage our employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our code, policies or law. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles.*
2. *All suspected violations can be reported anonymously through:*
 - a. *Web portal - WWW.KIAN-M.COM*
 - b. *Toll free number – 9033743821*
 - c. *Email - ethics@kian-m.com*
3. *Avenues available for raising concerns or queries or reporting cases could include:*
 - d. *immediate line manager or the Human Resources department of company*
 - e. *designated ethics officials of company*
 - f. *any other reporting channel set out in our company's 'Whistle-blower' policy*
 - g. *any other reporting channel set out in company's POSH Policy*
4. *We do not tolerate any form of retaliation against anyone reporting any concerns. Anyone involved in targeting such a person will be subject to disciplinary action.*
5. *If you suspect that you or someone you know has been subjected to retaliation for raising a concern or for reporting a case, we encourage you to promptly contact your line manager, Compliance Officer, the Human Resources department, the MD/CEO.*
6. *The company provides resources to assist all employees who encounter ethics and compliance issues that are difficult to resolve.*
7. *An employee's manager or supervisor is the first and best resource, since this person is familiar with the employee's duties. If the manager or supervisor is not available, or if the employee is not comfortable discussing the matter with his or her manager, the following resources are also available:*
 - i. *The employee's Business, Function, or Site Leadership.*
 - j. *The employee's Compliance Officer.*
 - k. *Legal or Finance HOD's*
 - l. *Human Resources, especially regarding workplace issues and policies, such as non-discrimination, non-harassment, and employee privacy.*

Addressing Possible Misconduct

8. *Corrective Action & Investigations: To ensure prompt, consistent enforcement of this Code of Conduct, the company will investigate reported instances of misconduct, such as violations of the law, regulations, or company policies and procedures. Where misconduct is identified, responsible individuals will be held accountable and disciplined, as applicable, up to and including employment termination and possible civil or criminal action. Making an intentionally false accusation of wrongdoing is considered misconduct.*
9. *Non-retaliation: We must maintain an environment where concerns and potential problems are brought forward. Company will not tolerate retaliation against anyone who, in good faith, raises a concern, reports suspected misconduct, or provides information related to an inquiry of suspected misconduct. The company will investigate any instances of possible retaliation, and discipline employees who have retaliated against someone who has reported possible misconduct.*

Consider compliance as a personal responsibility

10. *It is the responsibility of each employee to read carefully and understand the code, to comply with the code and to avoid any activity or interest which might compromise the employee or the company. All employees must conduct themselves accordingly and seek to avoid even the appearance of improper behaviour.*
11. *When confronted with a questionable decision or behaviour; it will not be taken into consideration, if the employee in question blames 'the company' or 'somebody else' or 'company' for the questionable decision/behaviour. Only the said employee will be held responsible as it is his/her actual responsibility and duty to not to get involved in any such improper situation.*

Asking Questions

12. *In case you have questions or you are in doubt as to whether a specific conduct complies with the code, you should discuss the same with your supervisor or your manager. Alternatively, you can submit your question to Compliance Officer or Business Head.*
13. *A good basis to assess whether a given conduct might be inappropriate is to ask yourself whether the conduct might be embarrassing to the company or the employee involved if the details were fully reported in the news. If it might, you will be well advised to seek clarification through one of the above mentioned channels.*

Sanctions

14. *Employees who fail to comply with the code, including supervisors who fail to detect or report wrongdoing, may be subject to disciplinary action up to and including termination of employment.*
 - a. *actions that violate the code,*
 - b. *requesting others – directly or indirectly – to violate the code,*
 - c. *failure to promptly raise a known or suspected violation of the code,*
 - d. *failure to cooperate in company investigations of possible violations of the code,*
 - b. *threatening or engaging in retaliation against another employee for reporting a (suspected) violation of the code.*
15. *Moreover, it is important to understand that a violation of certain standards contained in the code or in the laws and regulations may expose the employee(s) involved or company to civil liability and damages, regulatory sanction and criminal prosecution, including prison terms and fines. company is responsible for satisfying the regulatory reporting, investigative and other obligations that may follow the identification of a violation. company may not be able or willing to represent you in any criminal investigation or to protect you from these penalties.*

SUPPORTING INFORMATION

16. *Making Better Decisions*
 - a. *When facing a difficult situation for which an appropriate answer may not seem clear, the following questions may help assess the issue.*
 - b. *Before acting, review the situation with your supervisor to ensure he or she agrees with your intended resolution.*
 - c. *What is the potential ethics issue I face?*
17. *Could I potentially violate*
 - d. *A law or regulation?*
 - e. *The company guiding principles?*
 - f. *The company Code of Conduct?*
 - g. *An company rule, policy, or procedure?*
 - h. *An ethical standard of my profession?*
 - i. *My personal sense of ethical conduct?*
18. *What are my specific responsibilities in this situation?*
 - j. *What are my ethical responsibilities as a company employee?*
 - k. *What are the ethical responsibilities of my job?*

- l. Do I have ethical responsibilities as part of a professional or trade group?*
- 19. Who is possibly affected by this issue?
Customers? Shareholders? Suppliers? Colleagues? Local communities? My family and myself?*
- 20. What resources can help me resolve this issue?*
 - m. Relevant laws and regulations (contact Legal for help)*
 - n. The company guiding principles*
 - o. The company code of conduct*
 - p. Company policies and procedures*
 - q. Professional, trade, or industry standards*
 - r. Resources (see Use of Company's Resources)*
- 21. What possible course of action should I consider?*
 - s. What would my family think of my actions?*
 - t. How would my action look if the facts appeared on the front page of a newspaper?*
 - u. How might others want to be treated?*
 - v. How would I explain my actions to a colleague?*

Remember

It is our commitment to protect our reputation and our brand equity by adhering to the values and principles set out in this code. By doing so, we strengthen our unique culture and identity.

'Good faith' means having a reasonable belief that the information you have provided is truthful. It does not mean having 'all the evidence' about the potential violation or case reported.

We do not tolerate harassment in any form and therefore we expect every employee to discourage such misdemeanors in the workplace.

Violation by even a single employee of any law relating to anti-bribery, anti-corruption, anti-competition, data privacy, etc. could result in severe financial penalties and cause irreparable reputational damage to the company.

As a general rule, we should not accept gifts or hospitality from a business associate.

We must respect the property rights of others by never misusing their assets, intellectual property or trade secrets, including the copying or downloading of unauthorized software, trademarks, copyrighted material or logos. We should never make unauthorized copies of computer software programs or use unlicensed personal software on company computers.

A conflict of interest could be any known activity, transaction, relationship or service engaged in by an employee, his/her immediate family (including parents, siblings, spouse, partner, and children), relatives or a close personal relationship, which may cause concern (based upon an objective determination) that the employee could not or might not be able to fairly perform his/her duties to our company.

Striving for excellence in the standards of our work and in the quality of our goods and services is a core company value. It is the unwavering practice of this value that builds and sustains customer trust in our brand.