

## **BUSINESS ETHICS POLICY OF JYOTHY LABS LIMITED**

Jyothy Labs Limited's (the Company) Business Ethics Policy is the foundation of its reputation for integrity, ethics and respect for the law. This Policy contains the moral and ethical standards by which each employee, director and business partner/ associate of the Company is to conduct the business activities of Jyothy Labs Limited. Every employee, director and business partner/ associate of the Company needs to understand and adhere to these Standards.

### **A. INTEGRITY**

The business of the Company shall at all times continue to be conducted according to the highest standards of integrity and ethics, with due regard for all applicable laws for the time being in force. Each employee, director and business partner/ associate is expected to exercise sound judgment in all matters involving business ethics and integrity and to refrain from any conduct that could be questionable on ethical grounds.

### **B. COMPLIANCE WITH LAWS**

Fundamental to the Company's high ethical standards is that, all employees, directors and business partners/ associates are expected to be familiar with the Acts, laws, rules, regulations and/or guidelines applicable to their areas of responsibility. The Company have Compliance tool in place which provides for a list of laws that are applicable to the Company and also provides checklist for each of the respective department for completing their assigned task in compliance with the law.

If any question arises concerning the applicability of a prevailing law to a contemplated action, the Company Secretary & Head – Legal should be consulted. All employees, directors and business partners/ associates are expected at all times to comply with all applicable laws and regulations and to comply fully with the policies/ code of conduct of the Company.

### **C. DUTIES AND RESPONSIBILITIES OF ALL EMPLOYEES**

- I. All the employees associated with the Company shall at all time:
  1. uphold ethical standards of integrity and probity;
  2. act objectively and constructively while exercising his duties;
  3. exercise his responsibilities in a bona fide manner in the interest of the Company;
  4. devote sufficient time and attention to his professional obligations for informed and balanced decision making;
  5. not abuse his position to the detriment of the Company or for the purpose of gaining direct or indirect personal advantage or advantage for any associated person;
  6. assist the company in implementing the best corporate governance practices.

7. keep themselves well informed about the Company and the external environment in which it operates;
8. report concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct or this Ethics policy;
9. not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board or required by law.

#### **D. EQUAL EMPLOYMENT / BUSINESS OPPORTUNITY**

All applicants shall be treated equally according to their individual qualifications, abilities, experiences and other employment standards. There will be no discrimination due to race, religion, color, national origin, sex, age, disability or veteran/military status. The prohibition of discrimination based on sex includes sexual harassment.

The Company should give opportunity to those associates for doing business, which will be in the beneficial interest of the Company. There should not be any conflict of interest while selecting/ appointing vendors or associates.

#### **E. ENVIRONMENTAL RESPONSIBILITY**

Jyothy Labs Limited believes that doing business and protecting environment shall go hand in hand. It is the duty of all the employees, business partners/ associate of the Company to protect the environment for the health, safety and quality of life of our communities, customers and the public at large. All the concerned employees shall ensure that the environment, where the Company operates its manufacturing business, shall not be deteriorated because of the manufacturing activity carried on by the Company.

#### **E. SAFETY**

The Company's goal is to protect all its employees (on roll and outsourced) and director from work hazards and personal injury. The Company's workplace Safety, Health & Environment Policy contains the Company's objectives and strategies to meet its goal.

#### **F. FAIR DEALING**

The Company is committed to dealing fairly and honestly with its customers, suppliers and competitors.

Doing business in an honest and fair manner with the Company's customers means that the Company must earn their business based on the quality of its products and services and its ability to fulfill commitments. The Company's Employees, Directors and business partner/ associates shall not offer customers or Associates of customers any benefits, rewards or things of

value, which may violate the law, the customer's policies, or the Company's business practices.

Associates responsible for buying or leasing materials and services on behalf of the Company must do so objectively. Employees and Directors must not accept or seek out any benefit from a supplier or potential supplier that would even appear to compromise their judgment.

The Company's policy is to compete solely on the merits of its products. No false or misleading statements about our competitors, their products or their services will be tolerated. All comparisons of our products with those of our competitors must be accurate and factually supported. Employees and Directors are strictly forbidden from using any illegal or unethical methods to gather competitive information.

#### **G. ANTITRUST (COMPETITION) LAWS**

Employees should avoid contacts with competitors and their employees except in those limited situations where contacts are clearly necessary and for a lawful purpose. All employees in sales, product pricing, marketing functions and purchasing, etc. should try to keep them updated with the Competition Act enforced by the Government of India.

#### **H. POLITICAL AFFAIRS**

No contributions from Company funds are to be made directly or indirectly, to any political candidates or political organizations unless approved by the Board of Directors of the Company. The Company will not reimburse any employee or director for personal contributions.

**I. MISUSE OF ASSETS OR SERVICES; ACCURATE AND COMPLETE RECORDS**

Using any funds or other assets of the Company or its subsidiaries, or providing any services for any purpose, that is unauthorized by the Company or violates the law of any applicable jurisdiction (domestic or foreign) is strictly prohibited.

Associates should ensure that corporate records fairly and accurately reflect all transactions and dispositions of the Company's assets in reasonable detail. No false or artificial entries shall be made in any Company books or records for any reason, and no employee shall engage in any arrangement that results in such a prohibited act. No payment shall be approved or made with the intention or understanding that it is to be used for any purpose other than that described by the document supporting the payment. Employees, Directors and business partner/ associates are expected to cooperate fully with the Company's internal and external auditors.

**J. COMPLIANCE WITH THIS POLICY**

All directors, employees and business partner/ associates of the Company are responsible for the enforcement of and compliance with this Policy and to ensure Associates' knowledge and compliance. All recipients of this Policy and any agents of the Company have the responsibility to fully comply with this Policy. The Company Secretary will hold ultimate responsibility for the interpretation of this Policy.

Although the statements contained in this Policy pertain to many types of business conduct generally considered to be improper, they do not specifically list every type of conduct that the Company would consider undesirable and detrimental to its reputation or interests.

This Policy will be enforced at all organizational levels. Anyone who violates this Policy will be subject to disciplinary action, up to and including discharge.

#### **K. WAIVER OF THIS POLICY**

If any employee, director or business partner/ associate believes that a waiver of the policy is necessary or appropriate, including, but not limited to any potential or actual conflict of interest, a request for a waiver and the reasons for the request must be submitted to the Managing Director through Company Secretary. Any waiver of the Policy for Directors may be made only by the Board of Directors.

#### **L. AUTHOR AND PERIODIC REVIEW**

The Secretarial Department of the Company will be the Author of this Business Ethics Policy and will review this Policy on regular intervals and reserves right to amend or modify this it in whole or in part, at any time without assigning any reason whatsoever. The Policy shall be disseminated on the website of the Company.

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This Business Ethics Policy has received assent of the Board of Directors of the Company on May 18, 2021 and is applicable with immediate effect.