

JYOTHY LABS LIMITED

CONFIDENTIALITY POLICY

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I Applicability and Purpose

This Confidentiality Policy applies to all the Employees of Jyothy Labs Limited (“JLL”). The Employees acknowledge that in the ordinary course of business, they may come across, receive or have access to or handle information that is not publicly available and/or is proprietary information. Employees shall take all reasonable measures to protect all information belonging to or in the possession of JLL and keep it confidential and avoid any unauthorised dissemination, directly or indirectly. The purpose of this Confidentiality Policy is to protect any information that is not in public domain and is proprietary and/or confidential to JLL.

II Confidential Information

“Confidential Information” for the purpose of this Confidentiality Policy shall be any information which is not available in the public domain and shall include but not limited to: any document, email, information, discovery, invention, improvement, patent specification, formulations, plans, ideas, books, accounts, data, reports, drafts of documents of all kinds, correspondence, lists and files, decisions, information about Employees or suppliers, strategies, recommendations, office precedents, policies and procedures, budget and financial information in any form, i.e. physical, electronic, electromagnetic or otherwise including trade secrets, confidential information and proprietary information concerning products (both those already in the market and those being developed) which are special, valuable and unique assets of JLL.

III Confidentiality Requirements

Employees in possession of Confidential Information shall comply with the following:

- Keep all such information confidential;
- Respect and maintain the confidentiality of all Confidential Information related to JLL or its activities and all non-public information obtained in the performance of the Employee’s duties;
- Only use Confidential Information solely for the purposes of performing their duties as an Employee of JLL;
- Only disclose Confidential Information to persons who have a need to know and with an obligation to keep it confidential;
- Shall desist from copying or disseminating internal communications, whether or not marked confidential, to third parties (unless the Employee is providing information to a regulator or government agency);

- Employees shall not use for any purpose or disclose to others any Confidential Information or nonpublic information whether marked confidential or not, including sending confidential and/or internal work materials to personal email accounts. For example:
 - i Employees possessing unpublished price sensitive information about JLL shall not use such information to trade in JLL's securities, nor divulge such non-public information to other persons to trade in JLL's securities;
- Trade secrets, confidential information and proprietary information concerning products and services (both those already in the market and those being developed) are special, valuable and unique assets of JLL. Employees should hold all trade secrets and other confidential or proprietary information in strictest confidence and should not use such trade secrets or confidential or proprietary information in any way other than in performing their duties as employees;
- Trade secrets and other confidential or proprietary information shall not be misappropriated, transferred or disclosed, directly or indirectly, to any person or entity. This obligation remains in effect even after an Employee leaves JLL;
- No Employee will, without appropriate written approval of the Company Secretary of the Company disclose any information relating to the products of the Company including but not limited to its formulation, design, business plan, strategy, unique selling point, all data generated during the research and development of the product irrespective of the fact whether the same is generic or specific in nature or available publicly, through any publication or otherwise, or publish any of the above mentioned data whether or not confidential through any articles, thesis, journals, analytical notes or in any other form of public communications and shall refrain using of Company's name anywhere without the prior approval of the management of the Company;
- When in doubt, employee should treat information acquired in the course of employment at JLL in strictest confidence and consult the Company Secretary of the Company for clarification;
- On identification of any breach or non-compliance of this policy, immediately bring it to attention of the Company Secretary.

No Employee/personnel will, without appropriate written approval of the Company Secretary of the Company disclose / initiate communications, or respond to an inquiry from, or provide testimony before, the applicable Statutory or Regulatory authority of India involving sharing of any Confidential Information or non-public information whether marked confidential or not.

No written document containing Confidential Information must be left visible where it can be read by anyone. This includes telephone messages, computer prints, letters and other documents.

IV Disciplinary Action

JLL takes violations of this Confidentiality Policy seriously. Failure to comply with this Confidentiality Policy, could result in disciplinary action up to, and including, termination of employment. Any ex-Employee found to be in breach of this Confidentiality Policy (while in employment with JLL) shall be subject to legal action and dependent upon the circumstances of the breach, including cancellation / withdrawal of any or all benefits if extended to the ex-Employee by the Company.

V Relationship to other Policies

This Confidentiality Policy, where relevant, should be read in conjunction with the appointment letter and/or employment contract applicable to JLL's Employees and personnel, and other work rules, policies and procedures applicable to such Employees and personnel and all other applicable policies.

VI Cool-off Period

The policy shall survive, continue to be in full force and effect and remain applicable to all employees of the Company during the tenure of their employment with the Company and subsequently upto a period of 6 (six) months from the date of resignation, retirement, superannuation, termination etc. However, the cool-off period will not be applicable for any intellectual property or any new product development and strategy of the Company.

VII Amendments

The Board of Directors of the Company 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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