

CODE OF BUSINESS CONDUCT
KARAM CERAMICS LIMITED

PURPOSE:

This code is intended to provide guidance to all stakeholders including colleagues, subordinates and supervisors in managing affairs of the company in an ethical and professional manner. The purpose of this code is to recognize and deal with ethical issues and provide mechanisms to report unethical conduct of all employees.

UPHOLDING THE NAME OF KARAM CERAMICS LIMITED (KCL)

Every employee must Protect KCL's reputation by dealing fairly with shareholders/ members and other stakeholders including the customers, the public, competitors, suppliers, and one another. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, or misinterpretation of facts.

CONFLICT OF INTEREST:

1. It is expected that all employees of KCL during their employment shall not serve, be employed, engaged, concerned or interested in any government, political, trade or professional body (whether paid or unpaid) without the prior written consent of the CEO.
2. Any Personal interest, which may affect or might reasonably be deemed by others to affect an employee's impartiality, should be declared up front in writing.
3. The Company property and assets must not be used for personal work unless specific permission is obtained.
4. Each staff member is employed in the company and therefore, they are not to be involved, directly or indirectly, in any vocation, business or commercial activity. Any departure from this can only be made with the written permission of the CEO.
5. No employee shall ever enter into or assist any subversive activity, which may in any way be prejudicial to the interest of the company.
6. Prior approval of the CEO is required to accept a Board of Director position in any company or entity.
7. Generally, KCL does not encourage employment of relatives. However, exceptions may be made after special approval from the CEO and as long as this does not result in a conflict of interest or other work environment implications. Relatives are defined as employee's parents, spouse, children, siblings, first cousins, nephews and nieces or his/her spouse's parents, siblings, first cousins, nephews and nieces.

CONFIDENTIALITY AND ACCURACY OF INFORMATION:

Employees shall hold strictly confidential all information and materials provided to Employees by the Employer or created by Employee in the course of performing his employment which have to do with the business of the Employer.

The Employee shall use Confidential information only as directed by Employer. The Employee will not reproduce any of the Confidential information by means of copying, recoding, taking any photograph, etc. other than as directed by the Employer.

The Salary and emoluments package paid to employee is confidential information and every employee is required to strictly maintain this confidentiality.

An employee will be liable to immediate dismissal if it is discovered at any time that he/she has willfully suppressed any material information about himself/ herself or disclosures made by him/ her at the time of his/ her employment are false in any respect.

GIFTS & ENTERTAINMENT:

Gifts and Entertainment may create an inappropriate obligation or expectation on the part of the recipient or provider. Giving or receiving anything of any value, including gifts or payment for travel and entertainment to secure improper business advantage must be declined. For any such entertainment, a prior formal approval shall be required from the CEO.

No personal gifts or favors of any material commercial value can be made to, or accepted from, a third party. A gift or favor of material value is defined as an object with such a value that it may influence a buying decision and / or may lead to relation of dependency, or if accepting it may compromise, or appear to compromise the ability to make objective business decisions in the best interest of the company. In case of any doubt, the CEO must be consulted.

Corporate gifts, including gifts of promotional nature and generally of low value, may be acceptable. Any gift, given or received, with a value of Rs. 10,000 or more must be reported to the HR Consultant.

In KCL, there must be complete transparency between subordinates and supervisors with respect to business gifts.

MAINTAIN ACCURATE BOOKS & RECORD:

The Company requires all its departments to maintain accurate and complete books and records. Every business transaction undertaken by company must be recorded on its books accurately and in a timely manner.

SAFE & HEALTHY WORKING ENVIRONMENT:

KCL is committed to conduct its business in compliance with all applicable environmental and workplace health and safety laws and regulations. KCL strives to provide a safe and healthy work environment for employees and to avoid adverse impact and injury to the environment and communities in which it conducts its business.

KCL is committed to a work environment in which all persons are treated with dignity and respect. We strive to maintain a work environment that is free from harassment whether physical, verbal, or psychological. The Company expects that all relationships among persons in the workplace will be business-like and free of bias, harassment, or violence. Strict disciplinary actions are taken against any person found in breach of such a rule.

There shall be “Zero Tolerance” policy towards substance abuse.

EQUAL OPPORTUNITY EMPLOYER:

KCL shall provide equal opportunities to all its employees, without regard to their caste, religion, color, material status and sex. The policies and practices shall be administered in a manner that should ensure equal opportunity to the eligible candidates and the decisions are merit based.

POLITICAL ACTIVITIES:

The Company neither supports political parties, nor contributes to the funds of groups whose activities are calculated to promote political interests. No contributions to a political candidate or public official with the funds or assets or in the name of the company are allowed, including direct or indirect contributions or payments made through third parties such as suppliers or customers. The employees shall ensure their non-indulgence or any appearance for any political activities.

CONSEQUENCES OF NON-COMPLIANCE:

Any breach of the Code of Conduct, Terms of Appointment, Company's Policies, Rules and Regulations or any Acts of Misconduct and Fraud or Embezzlement will be viewed seriously and shall invite disciplinary action, including termination of employment besides other options, if required. For the said purpose, all company's policies and rules will also be deemed to be an integral part of this code.

DISCLAIMER:

This Code of Business Conduct does not cover all situations which might arise. In some situations that employees run into there may be problems that have not been addressed in this code. In such an event, employees should consult with their immediate General Manager/ Functional Head.

KCL OFFICE DECORUM GUIDELINES:

- It is essential for every individual to behave in a socially acceptable way whilst in office.
- Corporate Etiquette refers to set rules an individual must follow while he is at work. One must respect his/ her organization and maintain the decorum of the place.
- Let us go through some Do's and Don'ts at KCL:
- Never adopt a casual attitude at work.
- Respect each other's privacy.
- Put your hand phone in the silent or vibrating mode at the workplace. Loud ring tones can cause disturbance.
- Never discuss religion and politics at work place as it may hurt someone's feelings unknowingly.
- Keep your workstation clean and tidy.
- Respect for each other is paramount. In a dispute, sit with your colleagues, discuss issues face and decide on something which is mutually acceptable.
- Take care of your pitch and tone at the workplace. Never Shout on anyone or use foul words. Stay Calm and think rationally.
- Respect the work timings which are 9 am.to 6 pm. After 9.15 am it is considered late.
- Please ensure that you dress professionally in business casual-Monday through Friday. However, you are allowed to attend office in casuals on Saturdays.
- Females should avoid wearing heavy jewelry to work and stay with minimal make up.
- It is unethical to share confidential data with external parties and any other individual who is not related to the organization. Data in any form must not be passed to anyone outside the organization.
- Please respect Company Property.
- Park your vehicles at the space allocated to you. Don't Park your vehicles in someone else's parking spot or obstruct someone's way

It is everybody's responsibility to maintain discipline at workplace and call out unacceptable behavior whenever necessary.

DECLARATION OF CODE OF CONDUCT

I Mr. /Ms./ Mrs. _____, hereby declare and undertake that I have read and understood the Code of Business Conduct enforced at Karam Ceramics Limited and I will abide by the present Code of Conduct and those which may be enforced at any time in the future. I further agree that if I am found involved in any unlawful activity in contravention of the Code of Conduct at any stage during my employment at KCL, the organization shall have the right to take requisite notice and action according to Company's policy.

As per our Code of Conduct Policy:

I, hereby declare details of my blood relatives (including, children, parents, siblings, first cousins of self and spouse) employed in KCL directly or with third party, if any, as per below:

I hereby declare details of my relatives (including, children, parents, siblings. First cousins of self and spouse) who are direct suppliers or directly engaged in business with KCL, if any, as per below:

I hereby declare details of a full time/ part time business / job that I am currently engaged in along with my employment with KCL, as per below:

I hereby declare details of any legal cases against me, that I am currently facing or faced in the past, if any, as per below:

Signature _____

Designation _____

Date: _____
