

Syratron Technologies Pvt Ltd

Code of Conduct:

The Syratron Group, in the course of its business activities, shall respect the culture, customs and traditions of each country and region with which it interacts. It shall conform to trade procedures, including licensing, documentation and other necessary formalities, as applicable.

Financial reporting and records:

Syratron companies shall prepare and maintain its accounts fairly and accurately and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of India and/or any other country in which it may have offices in the future.

Internal accounting and audit procedures shall reflect, fairly and accurately, all of the company's business transactions and disposition of assets, and shall have internal controls to provide assurance to the company's shareholders that the transactions are accurate and legitimate. All required information shall be accessible to company auditors and other authorised parties and government agencies.

Any willful, material misrepresentation of and / or misinformation on the financial accounts and reports shall be regarded as a violation of the Code, apart from inviting appropriate civil or criminal action under the relevant laws. No employee shall make, authorise, abet or collude in an improper payment, unlawful commission or bribing of any person, whether it be government or private sector and report any such request to the management.

Business Approach:

Syratron employees shall market the company's products and services on their own merits. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.

Human Resource Practice:

Syratron companies shall provide equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age,



nationality, ethnic origin or disability.

Human resource policies shall promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Gifts and donations:

Syratron companies and/or its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business. The company shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud and corruption.

However, Syratron companies and/or its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given and / or are of a commemorative nature.

Government agencies:

Syratron companies and/or its employees shall not, unless mandated under applicable laws, offer or give any company funds or property as donation to any government agency or its representative, directly or through intermediaries, in order to obtain any favourable performance of official duties. Syratron companies shall comply with government procurement regulations and shall be transparent in all its dealings with government agencies.

Political non-alignment:

Syratron companies shall not support any specific political party or candidate for political office. The company's conduct shall preclude any activity that could be interpreted as mutual dependence/favour with any political body or person, and shall not offer or give any company funds or property as donations to any political party, candidate or campaign.

Quality of products and services:

Syratron companies are committed to supply goods and services of world class quality standards, backed by after-sales services consistent with the requirements of its customers, while striving for their total satisfaction. The quality standards of the company's goods and services shall meet applicable national and international standards.

BANGALORE
MUMBAI
HYDERABAD
AHMEDABAD
NEW DELHI

www.syratron.com

Ethical conduct:

Every employee of Syratron Company, including Directors and the Chief Executive, shall exhibit culturally appropriate deportment in the countries they operate in, and deal on behalf of the company with professionalism, honesty and integrity, while conforming to high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be so by third parties.

Every employee shall be responsible for the implementation of and compliance with the Code in his / her environment. Failure to adhere to the Code could attract severe consequences, including termination of employment.

Regulatory compliance:

Employees of Syratron, in their business conduct, shall comply with all applicable laws and regulations, in letter and spirit, in all the territories in which they operate. If the ethical and professional standards of applicable laws and regulations are below that of the Code, then the standards of the Code shall prevail.

Directors of Syratron shall comply with applicable laws and regulations of all the relevant regulatory and other authorities. As good governance practice they shall safeguard the confidentiality of all information received by them by virtue of their position. They will also be responsible for the employees following the same practices.

Concurrent employment:

Consistent with applicable laws, an employee of a Syratron company shall not, without the requisite, officially written approval of the company, accept employment or a position of responsibility (such as a consultant or a director) with any other company, nor provide freelance services to anyone, with or without remuneration. In the case of a full-time director or the chief executive, such approval must be obtained from the chief executive of the company.

Conflict of interest:

An employee or Director of a Syratron company shall always act in the interest of the company, and ensure that any business or personal association which he/she may have does not involve a conflict of interest with the operations of the company and his / her role therein. An employee, of a Syratron company, shall not accept a position of responsibility in any other non-Syratron company

or not-for-profit organization without specific sanction.

Competent authority, in the case of all employees, shall be the chief executive, who in turn shall report such exceptional cases to the board of directors on a quarterly basis.

An employee or a Director of a Syratron company shall not engage in any business, relationship or activity which might conflict with the interest of his/her company or the Syratron group. A conflict of interest, actual or potential, may arise where, directly or indirectly...

- a) An employee of a Syratron company engages in a business, relationship or activity with anyone who is party to a transaction with his/her company.
- b) An employee is in a position to derive an improper benefit, personally or to any of his/her relatives, by making or influencing decisions relating to any transaction.
- c) An independent judgment of the company's or group's best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest shall include the following:

- a) An employee or a full-time director of a Syratron company conducting business on behalf of his/her company or being in a position to influence a decision with regard to his / her company's business with a supplier or customer, resulting in a benefit to him/her or his/her relative.
- b) Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of a Syratron company, where such an individual is in a position to influence decisions with regard to such benefits.
- c) The interest of the company or the group can be compromised or defeated.

Protecting company assets:

The assets of a Syratron company shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorised. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources, as well as intangible assets such as information technology and systems, proprietary information, intellectual property, and relationships with customers and suppliers.

Integrity of data:

Every employee of a Syratron company shall ensure, at all times, the integrity of data or information furnished by him/her to the company. He/she shall be entirely responsible in ensuring that the confidentiality of all data is retained and in no circumstance transferred to any outside person/party in the course of normal operations without express guidelines from or, the approval of the management.

Reporting concerns:

Every employee of Syratron company shall promptly report to the Management, when she/he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanor or act not in the company's interest. Such reporting shall be made available to suppliers and partners, too.

The Syratron CoC does not provide a full, comprehensive and complete explanation of all the rules that employees are bound to follow. Employees have a continuing obligation to familiarise themselves with all applicable laws, company policies, procedures and work rules.

The CoC will be updated from time to time to reflect the changes in the corporate and working environment in which Syratron companies and its employees operate.