

	TRITON VALVES LIMITED	Document Ref. No.	TVL/QM/01
	IATF 16949-2016	Issue No/Date	02/ 19.07.2023
	Quality Manual	Rev No/Date	00/ 19.07.2023
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CODE OF CONDUCT AND WORKPLACE ETHICS POLICY

I. PREAMBLE

Triton Valves Limited (the “**Company**”) is committed to ensure that its business is conducted, in all respects and all the times, according to rigorous ethical, professional and legal standards, which prevail from time to time. The Company is also committed to create a workplace, at all of its working locations, that, all the times, is free from harassment and discrimination, where co-workers are respected, and provided an appropriate environment so as to encourage good performance and conduct.

II. PURPOSE

This Policy aims to provide guidance to all Employees of the Company on how and in which manner should the conduct of Employees be when they are undertaking business on behalf of the Company.

III. COVERAGE

This Policy applies to all staff of the Company. Staff shall mean all individuals on full-time or part-time employment with the Company, with permanent, probationary, trainee, retainer, temporary or contractual appointment.

IV. CODE OF CONDUCTS COVERED UNDER THE POLICY

a) Professionalism

The personal and professional behavior of Employees shall confirm to the standards expected of persons in their positions, which includes:

- ✓ A commitment to and adherence to professional standards in their work and in their interactions with other Employees of the Company;
- ✓ A commitment to maintaining the highest standards of integrity and honesty in their work;

b) Conflict of Interest

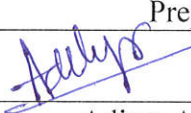
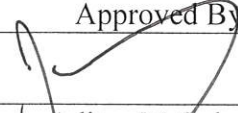
Each Employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company. Accordingly, the Company expects its Employees to act in the Company's interest at all times.

Employees are advised not to engage in any other business, commercial or investment activity that may conflict with their ability to perform their duties to the Company. Employees must also not engage in any other activity (cultural, political, recreational, social...) which could reasonably conflict with the Company's interests and interfere with the performance of their duties.

For avoidance of doubt, mere financial portfolio investments shall not be considered as activities that conflict with the business of the Company.

c) Confidentiality of Information

As a result of employment with the Company, Employees may be entrusted with confidential information; with regard to the Company and/or its affiliates, its customers and suppliers. Upon joining, Employees are required to separately read, acknowledge and sign the 'Confidentiality

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Agreement' that shall explicitly mention the terms and conditions of the confidentiality obligation and treatment of confidential information and intellectual property of the Company.

d) Gifts, Entertainment, and Favors:

Employees shall not accept entertainment, gifts, or personal favors that could, in anyway, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which the Organization has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their positions with the Organization might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

e) Integrity of Financial Information

Shareholders, management and other interested parties must have complete and accurate financial information in order to make informed decisions. Many Employees participate in accounting processes that directly impact the integrity of external financial statements and internal management reports. All such Employees have a responsibility to ensure that all transactions are recorded in Company's accounts accurately and promptly and they must immediately report any known inaccuracies. Misrepresentations by Employees that result from intentional acts that may conceal or obscure the true nature of a business transaction are clear contraventions of this Policy.

f) Protection and Use of Company Property

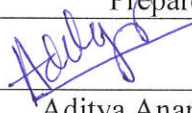
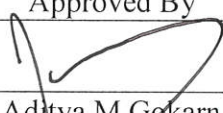
All Employees of the Company are responsible for protecting and taking reasonable steps to prevent the theft or misuse of, or damage to Company's assets, including all kinds of physical assets, movable, immovable and tangible property, corporate information and intellectual property such as inventions, copyrights, patents, trademarks and technology and intellectual property used in carrying out their responsibilities. All Employees must use all equipment, tools, materials, supplies, and Employee time only for Company's legitimate business interests. Company's property must not be borrowed, loaned, or disposed of, except in accordance with appropriate Company's policies. All Employees must use and maintain Company's property and resources efficiently and with due care and diligence.

g) Whole Time and Attention

All Employees shall devote their time and their best efforts to promote the Company's business and may not without the prior written consent of the Company (and subject to any terms and conditions as may be imposed by the Company) engage or be interested in (whether directly or indirectly) in any other business, employment or vocation for pecuniary gain.

h) Alcohol & Substance Abuse

The use or possession of alcohol, illegal drugs, and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited. However, possession of prescription medication for medical treatment is permitted. There may be company-sponsored events where management approves the serving of alcoholic beverages. In these cases, all appropriate liquor laws must be followed, including laws regarding the prohibition of

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serving of alcohol to those under the legally permissible age. However, under all such cases, excessive drinking, intoxication and misbehavior at these events is prohibited and will be dealt with severely.

i) Harassment and Discrimination

Every employee shall Conduct in a professional manner and treat others with respect, fairness, and dignity. The Company does not tolerate harassment or discrimination. In addition, applicable laws and ordinances prohibit discrimination in employment based on race, color, religion, age, sex, national origin, ancestry, physical or mental disability, medical condition, veteran status, marital status, or sexual orientation. The Company is committed to providing a work environment that is fair and nondiscriminatory.

As a good corporate citizen the Company is committed to a gender friendly workplace. This is in order to enhance equal opportunities for men and women; to prevent/stop/redress sexual harassment at the workplace and to guarantee good employment practices. The Company demands, demonstrates and promotes professional behavior and respectful treatment of all employees irrespective of their gender, culture and cadre.

j) Fraud

Fraud — or the act or intent to cheat, trick, steal, deceive, or lie — is both dishonest and, in most cases, criminal. Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible civil and/or criminal action against the concerned Employee.

Some examples of Fraud include:

- Submitting false expense reports;
- Misappropriating assets or misusing Company's property;
- Unauthorized handling or reporting of transactions;
- Making any entry on Company records or financial statements that is not accurate and in accordance with proper accounting standards

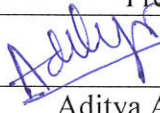
This list is not limited to the above said acts and it may be extended to any act of an employee which the Management may consider as fraudulent.

k) Compliance with Laws and regulations and internal policies

Every employee of a TVL shall, in his business conduct, comply with all applicable laws and regulations and internal policies, both in letter and in spirit, in all the territories in which he operates. If the ethical and professional standards set out in the applicable laws and regulations and internal policies are below that of the Code then the standards of the Code shall prevail.

l) Environment, Health and Safety (EHS):

TVL is totally committed to maintain high standards of health and safety at the workplace and to be sensitive to protection of the environment by responsible Management of waste and pollution. This is an important responsibility of the employees in all functions and at all levels that mitigation of risks from all TVL facilities, products, services and activities. Where risk is identified, a warning to that effect must be communicated to the persons at the workplace and also to the communities or persons likely to be impacted.

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m) Data Protection

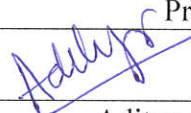
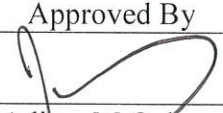
Employees responsible for maintaining data are committed to taking appropriate measures to protect Employee and/or Employment data against unauthorized access or disclosure. Employee and/or Employment data includes any information about an identified or identifiable person that is obtained in the context of a person's working relationship with TVL.

n) Reporting concerns

Every employee of a TVL shall promptly report to the Management any actual or possible violation of the Code or an event he becomes aware of that could affect the business or reputation of his or any other TVL.

V. COMPLIANCE WITH THE POLICY

Non-adherence of this Policy shall be construed as misconduct that could warrant disciplinary action which may include Demotion, Reprimand, Detraction of benefits for a definite or indefinite time, Suspension or Dismissal based on the gravity of the non-compliance. The decision in this regard will lie with the Management.

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