



## CODE OF ETHICS / CONDUCT

### **Purpose**

1. To maintain efficient cooperation and the high quality of service which will ensure continued growth of the company, the employees are expected to conform to certain code of ethics / conducts.

### **Scope**

All staff of SANGAM INDIA Ltd. is covered under the scope of this policy

### **Policy**

- Honesty, integrity and fairness in dealing with customers as well as with the peers, superiors and subordinates.
- Do not solicit, accept or offer gifts, gratuities, cash, discounts, commission or other benefits during the employment, which may influence the opinion / judgment in performing the duties.
- Do not accept employment in any other company / firm / organization during the course of employment in the company.
- Do not use or disclose company's confidential / important information / documents to anybody outside the company either through participation in professional or civic organizations or otherwise.
- Respect for the feelings and rights of others.
- Assurance to be given to all that any action or conduct of the employee might not harm other employees of the company.
- There should not be the violation of company's rules and regulations.
- Follow the instructions and perform the assigned work in a timely manner.



- Use of abusive language or displaying public disrespect with the other employees / customers within the company's premises or while on duty will not be tolerated.
- Making any false or malicious statement against the company or any employee will be considered as misconduct and will be initiated with disciplinary action.
- No destruction / damage to the company's property / facility / assets / etc.
- Restrict use of facilities like making long distance calls / e-mailing facility /internet / etc. for personal purposes
- No engagement in some fraudulent activities / theft
- Making workplace / office premises drug / alcohol / smoke free/Tobacco in any form ,Gutaka Kheni etc. free
- Maintenance of professional appearance either outside or in the office as it represents the image of the company
- Maintenance of personal hygiene / grooming / courteous behavior
- Keeping the workplace neat and clean
- Maintenance of good attendance level as it is required for achieving total job performance
- Recognize and avoid all situations which involves conflict of interest between the employees personal interest and the interests of the company
- No employee will involve himself in any part time job





## GUIDING PRINCIPLES

SANGAM INDIA Ltd. has defined its guiding principles based on its Core values. They are the standards for conduct of business and behavior of all its employees.

### **1. Value Creation**

Sustained value creation for all its stakeholders, Employee, Supplier, Customer, Shareholder & Society

- We shall continuously strive towards optimum value creation for all its stakeholders:  
Employee, Supplier, Customer, Shareholder & Society
- We shall work towards maximization of shareholder value and ensure a healthy return on their investment, in accordance with the applicable laws
- We shall listen to the voice of customer for providing innovative and cost effective products and services. We shall regularly measure customer satisfaction and continually improve service orientation, both before and after sales.
- We shall strive towards providing an environment of high employee engagement.
- We shall give all our suppliers and dealers a chance to compete fairly for our business and shall commit ourselves to honour the contract totally.

### **2. Transparency**

Conduct all business dealings along transparent lines

- We shall be dignified in our approach towards business growth and market competition and shall strive to promote fair and judicious competition
- We shall be committed to good corporate governance by conducting business without making unfair and misleading statements.
- We shall be transparent in all our dealings except in cases where the needs of business security dictate otherwise. Our books and records shall be maintained in a manner that reflects the true value of our business transactions.



### 3. Personal Conduct

Display high standards of personal and professional conduct

- We shall uphold the values of integrity, fairness, trust, respect, teamwork and meritocracy in our conduct and behavior at work.
- We shall not create any bias based on caste, color, religion, disability, gender, national origin, sex, age or other basis
- We shall maintain a healthy workplace free of harassment (including sexual harassment) and discrimination, and one that is sensitive to the diversity of its employees.
- We shall not misuse our position/title/authority or opportunities that are gained through Company's business or information to induce a benefit for others or self
- We shall not involve in any activity which is a conflict between personal interest and the interest of the company. In the event of apprehending any conflict of interest, we shall disclose the relevant facts in writing, explaining the circumstances that create or could create the conflict of interests.
- We shall not accept gifts, favors, complimentary or entertainment from a person or organization with which there are official dealings. We shall not engage in misinformation, disinformation or personal vilification or victimization of any employee or stakeholder. We shall not give any statement detrimental to the interests of the company to the press or any other form of media.
- We shall demonstrate a commitment to an anti-fraud culture through our actions. We shall prevent fraud and theft and shall treat any incidences seriously.
- We shall not indulge in insider trading in any form and abstain from giving information to an outsider or using it for our personal gains which may lead to insider trading.

### 4. Learning & Development

- We shall foster a learning culture and an environment of high employee engagement
- We shall promote a culture of excellence and focus on continuous skills development towards Quality, efficiency and business leadership.

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- We will recognize and honor merit and will not have any bias on other factors.

## 5. Creativity & Innovation

Encourage creative experimentation, institutionalizing continuous improvement in all aspects of business and performance.

- We shall encourage creative experimentation in all aspects of business and performance
- We shall foster a work culture aimed at continuously improving our work processes and embracing new ideas and applying them.

## 6. Good Corporate Citizen

Enrich the quality of life of the communities we serve.

- We shall dedicate efforts to the social and environmental issues to enrich the quality of life of the people in the communities in which the company operates.
- We shall comply with all laws and regulations in true spirit which apply to our business activities be it at home or abroad.

## 7. Environment, Safety and Health

Manage, protect and preserve the safety and health of our people, products, properties and environment.

- We shall respect the necessity of protecting the environment consistently with the need of sustainable development. We shall in the conduct of business affairs, comply with all regulations regarding the preservation of the environment.
- We shall prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of our products and services on the environment.
- We shall actively assist in not only preserving the natural world but also augmenting it and increasing the presence among us.
- We shall manage the risk and safety including the safety of products, locations and the health of our employees in the most efficient manner.
- We shall ensure that all processes, equipment and facilities are designed, constructed, operated and maintained in a safe manner.
- We shall ensure that the Company's tangible and intangible assets are not misused but employed for the purpose of conducting the business for which they are duly authorized.

## 8. Confidentiality



Respect and ensure confidentiality of all business related information.

- We shall respect the confidentiality of data pertaining to company's business / proprietary information / trade secrets made available to us from time to time.
- We shall maintain confidentiality during and after our employment with SANGAM INDIA Ltd. shall return all confidential documents to the company at the time employment ends or as and when the company may request.
- All authorizations issued by the company in our favor shall stand revoked from the date of Resignation/termination from employment. We shall immediately return all such authorizations, both originals and copies to the company.

## 9. Speaking Up

Speak Up and be a True SANGAM INDIA Ltd. employee

- SANGAM INDIA Ltd. expects its employees to report promptly suspected violations of law, company's policies or guidelines.
- Each employee shall immediately take up any breach of conduct with his / her superior or senior management of the company.
- The confidentiality of the employees who shall raise concerns shall be protected.
- No action shall be taken against any employee for asking questions, voicing concerns, or making complaints or suggestions in conformity with the guidelines described above.

## 10. Guidelines

- The implementation of the Guiding Principles is the responsibility of each functional head for his department and he will ensure adherence to these principles and act promptly when a breach occurs.
- SANGAM INDIA Ltd. Guiding Principles shall be given to all existing employees as well as new employees.

**V.K. Sodani**  
Executive Director

**S.N. Modani**  
Managing Director





## **Employee Code of Conduct Declaration**

Myself ----- (Employee Name) here by confirm that I have read and acknowledge the content of Sangam (India) Limited on ----- (Date) and further confirm that I will comply fully with the extent that is written.

By signing this statement I declare that I acknowledge and agree to abide by this (Sangam (India) Limited) Employee Code of Conduct.

Employee name: \_\_\_\_\_

Employee Code: \_\_\_\_\_

Department: \_\_\_\_\_

Designation: \_\_\_\_\_

Date of Joining: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

\* The original signed statement should be placed in the employee's personnel file and a copy should be provided to the employee.