

This policy shall be called MECPL Code of Conduct and Ethics Policy. MECPL reserves the right to cancel or amend all or any part of this policy and issue supplementary rules at any stage.

1. Overview

Ethical behaviour is an essential part of your position with Maxop Engineering Co. Pvt. Ltd. (herein "MECPL") and is a personal responsibility that should be taken very seriously. We need and expect each Employee to be accountable for their work and behavior and to support the values, principles and standards upon which MECPL's business reputation rests. This Code of Conduct (the "CoC") is a guide to help you live up to MECPL's values, abide by MECPL's policies and respect the best interests of our customers.

The purpose of the Code is to describe principles of business conduct and to provide guidance in ethical decision making. Many sections of the Code reference matters for which specific policies exist; this is because the Code encompasses standards of behavior set forth in other MECPL policies. You are expected to become familiar with MECPL policies that directly impact your daily work.

The Code outlines the basic legal obligations of all MECPL employees and related stakeholders. Although the Code lays out fundamental principles of ethical and legal conduct, it cannot anticipate every ethical dilemma or situation you may encounter in performing your daily work. If at any time you are unsure about the proper course of action discuss your concerns with your manager.

2. Purpose

The main objective of this Code is to promote ethical conduct and ensure efficient compliance with all legal requirements and other standards of business conduct & service rules and regulations.

All employees are expected to read, understand and follow this Code of Conduct and Ethics and endeavor to achieve the aims of MECPL and the goals agreed for their work while complying with the Code in its letter and spirit. This Code of Conduct and Ethics is subject to modification. It may be updated as and when needed and notified by intranet and e-mail.

3. Scope

The Code applies to all employees, contractors and Top management, which for purposes of the Code are referred to as "Employees". Contractors include any consultants, suppliers and vendors who are required to have access premise or to MECPL's confidential, business and proprietary information to perform their duties.

4. Policy Statement

Business Conduct (Honesty, Integrity and Ethical Conduct)

Conduct yourself professionally and with personal Honesty, Integrity, Ethically, fairness both in and out of the workplace, while for company as well as when representing the company. Integrity and ethical conduct include ethical handling of actual and apparent conflict of interest between personal and professional relationships. Competitive advantage or profit must not be sought through unlawful, dishonest or unethical business practices.

No employee will take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Communicate and negotiate with honesty with all Employees, customers, stakeholders, suppliers, associates and other members of the public. Our obligation to act with integrity and within the spirit of this Code continues while traveling, whether domestically or abroad.

We treat our customers, suppliers, stakeholders and each other with integrity always, with respect in our actions, honesty and openness in our communication.

Commitment to People

We foster a healthy and supportive environment, leverage diversity and promote mental, physical and social well-being.

Safe working environment

The safety of people in the workplace is of prime importance to the Company. The Company maintains a comprehensive EHS (Environment, Health and Safety) management system at all its establishments. All forms of substance abuse, as well as the use or distribution of drugs or alcohol while at work is prohibited. The Company should maintain compliance with local laws to maintain healthy work surroundings and it collaborates with business partners to ensure that they also exercise their responsibility for a safe working environment.

The Company promotes clean and green energy initiatives to ensure a sustainable environment and takes steps necessary to reduce wastages. All employees are required to:

- Stop work on your own or others', if they consider it unsafe.
- Play their part in protecting the environment.
- Be sure that their performance is not impaired, for example by a lack of sleep, alcohol, or any other drugs etc.
- Ensure contractors and others with whom they work with to comply with applicable EHS requirements.
- Report to respective in charge of factories or plant head any accidents, injury, illness, or unsafe condition immediately and take effective countermeasures.

Equal opportunities for employment

The Company works consistently to provide equal opportunities to all and does not discriminate against any person based on their gender, caste, religion, age (within statutory limits), marital status, nationality, ancestry, ethnicity, geographical origin, sexual orientation, disability or any other trait protected by law, with respect to hiring, promotion, transfer, wages /remuneration, compensation & benefits, career development opportunities, etc. The company shall ensure that the use of temporary, outsourced labor such as public or private security forces is in accordance with applicable local laws and regulations.

Workplace free of harassment

MECPL recognizes and respects the right of every employee for a harassment free workplace. Hence, employees are expected to ensure a healthy, safe and conducive work environment that is free from harassment of any kind or form. Employees are prohibited from indulging in harassment of any kind or form-whether physical, verbal, psychological or sexual in nature. This includes all types of unwelcome, offensive, demeaning and intimidating behaviour, whether explicit or implicit. The Company sets a standard of 'zero tolerance' for harassment. We are all responsible for ensuring that we avoid actions or behaviour that are, or could be, viewed as harassment.

The Company views all incidents of 'sexual harassment', very seriously and encourages employees to report any incidents of sexual harassment to the Internal Complaints Committee (ICC) formed under Policy of Prevention of Sexual Harassment at the workplace of the Company ("POSH Policy"). The Company may initiate strict disciplinary action against an employee found guilty of any kind of sexual harassment.

Working Hours

MECPL prohibits employees to work more than the maximum hours as set by local and national laws. Overtime should be carried out only in emergency or unusual situations, restricted as per regulations. Employees should avoid absenteeism without prior approval of the Reporting Manager.

Human Rights

We recognize the valuable role that business can play in the sustainable protection of human rights, and we are committed to respecting the human rights of our workforce, communities, contractors and suppliers in line with the UDHR, The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, UN Global Compact, OECD guidelines.

To ensure that no violation of human rights take place, we dedicatedly stand by the following:

1. We are committed to equal opportunity and are intolerant of discrimination and harassment. In all aspects of employment, such as recruitment, compensation and benefits, training, promotion, transfer and termination, we will treat individuals justly and in a non-discriminatory manner, solely according to their abilities to meet the requirements and standards of their role.
2. We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats (to the maximum extent possible).
3. We work to maintain workplaces that are free from discrimination or harassment based on race, religion, caste, sex, color or social origin, ethnicity, age, disability, sexual orientation and gender.
4. We respect our workers' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment, in accordance with applicable law.
5. We prohibit interference in any way with the establishment, functioning or administration of workers' union and collective bargaining process.
6. The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements.
7. We prohibit the use of all forms of forced labour including bonded labour, modern forms of slavery and any form of human trafficking.
8. We prohibit the hiring of individuals that are under 18 years of age. We prohibit all forms of child labour, forced/ trafficked labour, discrimination and harassment.
9. We respect the privacy of all our employees and business partners by taking measures that are prescribed by law to protect and secure personal data. We do not disclose anyone's personal, medical and financial information unless legally mandated
10. We maintain positive legal compliance with applicable constitutional and regulatory human rights requirements.
11. We undertake a due diligence process for identifying, assessing and managing potential risks and impacts related to human rights.
12. We are committed to promoting awareness of human rights with employees at various levels of our operations through training and communication.
13. We are committed to providing access to remedy by resolving grievances relating to human rights violations in a timely manner.
14. We encourage our business partners, contractors, suppliers to enforce these commitments and abide by them in totality in their respective work areas/ operations. We seek to collaborate with entities practicing similar values.
15. We are committed to continually improving human rights performance by sharing good practices and learnings, setting and reviewing targets, and monitoring, reporting and disclosing performance.

Legal and social responsibility

Ensure that your actions comply with and are within the meaning and intent of all applicable laws and regulations. Ensure that your actions are free from suspicion and criticism and have no unfavorable effects on society. Each employee will acquire sufficient knowledge of the legal requirements relating to his or her duties so as to be able to carry out those duties in a legally permissible manner and to recognize when to

seek advice on the applicable legal requirements from others with greater expertise.

Conduct with customers

Serving customers is the focal point of our business. Our customers deserve the highest quality service and standards in all transactions. Provide our customers with value and deal with them fairly. Act with integrity and do everything possible to provide great service to our customers, either directly or by supporting the work of other individuals or business units.

Use of computer systems and software

Our computer systems and software form the backbone of our office services and our operations infrastructure. Every effort should be made to protect MECPL's computer systems and associated software from various threats to their security such as accidental or deliberate destruction of data or equipment, interruption of service, disclosure of confidential information, theft or corruption of data. Any security concerns with respect to our systems or software, or any viruses or data network attacks, weaknesses or unexplained system changes should immediately be reported to the HOD-IT & Systems.

Use of Corporate Information and Property

Do not disclose information about MECPL activities or our customers' activities to non-authorized Employees within the workplace, or anyone outside the workplace unless in accordance with MECPL.

All information held by MECPL is confidential and the property of MECPL. This includes information relating to MECPL business, property, Employees, customers, consultants, or others that is not generally available to the public.

In our business, we become aware of confidential information about our customers' business and personal ventures. We have a responsibility to uphold the trust of our customers. Do not discuss or disclose confidential customer information outside the workplace and ensure that uses of confidential customer information within MECPL are consistent with the purposes for which it was collected. Our obligation to keep corporate information confidential continues post-employment.

The obligation to protect MECPL's assets includes its proprietary information. Proprietary information includes, without limitation, intellectual property, such as trade secrets, patents, trademarks and copyrights, business marketing and service plans, manufacturing or service ideas, designs, databases, records, remuneration information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of this Code. It may also be illegal and may result in civil or criminal penalties.

Corporate property

Corporate property includes, but is not limited to premises, equipment, supplies, furnishings, Employee search accounts, funds, reports, records, vehicles, trade secrets, computer software, hardware and networks, internet accounts and intangible items such as the details of business application systems. Each employee must act in a manner which protects MECPL's assets and resources and ensures their responsible and efficient use. All assets and resources of MECPL must be used for legitimate business purposes (incidental non-material personal use is considered a legitimate business purpose). MECPL's assets are protected and not used for personal use unless otherwise authorized. MECPL's intellectual property is subject to copyright and is not reproduced, distributed or altered without authorization, as far as practicable, contracts are put in writing; and unless otherwise Authorized MECPL's name or purchasing power is not used to obtain personal benefits, discounts or rebates.

Proper Reporting of Financial Transactions

You are accountable for any corporate funds over which you have control. Follow the set procedures for handling, recording and protecting funds. When spending MECPL funds, ensure that MECPL receives good value for the expenditure. Do not use MECPL funds for personal benefit. Compliance with the Financial

Reporting Standards and internal controls is always expected, and MECPL's books of account, reports, records and other documents must accurately account for and report all assets, liabilities and transactions affecting MECPL. Each employee will promptly bring to the attention of MECPL's Corp Head-HR any information he or she may have concerning (i) significant deficiencies in the design or operation of internal controls over financial reporting which could cause MECPL's disclosure to not fully comply with all disclosure requirements or similar standards, or (ii) any fraud, whether or not material, that involves management or other employees who have a role in MECPL's financial reporting, disclosures or internal controls over financial reporting.

We must:

- Maintain accurate and reliable records relating to business, customers and Employees to meet our legal and financial obligations and in accordance with our accounting and business practices.
- Not intentionally cause MECPL's books or records to be incorrect or misleading in any way and relevant information should never be omitted, deleted or concealed.
- Not create or participate in the creation of any record intended to conceal anything that is improper; Properly and promptly record all disbursements of funds.
- Co-operate and ensure full disclosure in communications with both internal and external auditors and with the Chief Financial Officer and his group.
- Promptly disclose knowledge of any untruthful or inaccurate statements or records whether intentionally or unintentionally made
- Promptly bring to the attention of your manager any transactions that did not seem to have a legitimate commercial purpose.
- Information must only be destroyed in accordance with approved retention schedules and procedures.
- Our Work Environment

Employee Professionalism

We are all committed to supporting a safe, healthy and positive workplace for all Employees. We will not tolerate behaviour that interferes with an employee's ability to perform his or her duties. As we have declared our Unit is tobacco free so the use of Tobacco/alcohol or any illegal drugs are not acceptable in our work environment. Responsible alcohol use may be acceptable in very limited circumstances as part of MECPL social or business events.

Employee privacy

We are all committed to protecting the privacy of Employee personal information. Employee personal information will not be collected, used or disclosed other than as authorized or as required for business reasons.

Conflict of Interest

We must not engage in any activities which could give rise to, or could be perceived to give rise to, a conflict of interest. As employees, managers, executives and Directors, our business loyalty rests in placing MECPL's interests, including those of its customers, before our personal interests. A "conflict of interest" arises in a situation where your personal activities, interests or dealings may, potentially or be perceived to impair your ability to perform your duties as an MECPL Employee; have a negative impact on MECPL's reputation; or Result in a personal gain or advantage due to your position in MECPL; or in any situation where an Employee has, or may have, a financial or other personal interest (other than solely as a director, officer or employee of MECPL different from, additional to or beyond solely the interests of MECPL.

We must not use our position to influence or bypass MECPL procedures for personal gain nor for the personal gain of a family member, friend, colleague or anyone else. Conflicts of interest negatively impact both you and MECPL. Whether or not an actual or potential conflict of interest exists depends upon the facts of each

case. If you become aware that a conflict of interest might exist, seek clarification and guidance before proceeding or, if the activity has commenced, immediately cease the activity and disclose it in writing to the Corp Head-HR as soon as possible.

Outside activities, employment and business involvement

You may take outside employment, directorships or volunteer positions or engage in outside business or other activities unless such activities: Create a real, potential or perceived conflict with MECPL’s interests. Interfere with the performance of your duties or which adversely affects your performance at work. Intrude on the time, attention and energies normally applied to MECPL; or are forbidden by law or involve any unethical or immoral conduct. You may not receive a financial benefit from an individual or organization doing business with MECPL when you are able to influence MECPL’s decisions pertaining to that individual or organization. Do not provide preferential treatment on any MECPL business matter or transaction to family members, friends or any organizations with which you may be perceived to have a connection. Ensure that you disclose any circumstances that may be an actual, potential or perceived conflict. Unless otherwise authorized.

Employees must not:

- Either directly, or indirectly, through immediate families, have a financial or other interest in any concern doing business with MECPL or otherwise derive any benefit from a business transaction (other than employment or use of the office services as a customer) with MECPL. Contract with or render services to MECPL outside of or in addition to regular employment; participate in any outside activity which competes directly or indirectly with MECPL, act in the capacity of a director, officer, partner, consultant, employee or agent for any supplier, contractor, subcontractor, customer or competitor of MECPL.
- Enter business relationships on behalf of MECPL with relatives, close friends or any company controlled by such persons.
- Convey to others or use for your benefit, non-public information acquired during your employment; sell to or buy anything from MECPL and appropriate to yourself or others any business opportunity in which MECPL would be interested.
- Involvement in political activity- You may participate in the political process at any level of government providing that your involvement does not interfere with your work or the effectiveness of your position. Ensure that any political activity does not place you in a conflict-of-interest situation with MECPL.
- Should not indulge in illegal boycotts and illegal strike etc.

Gift acceptance:

Gifts or benefits of any kind must not be given or received by an Employee or their immediate family, when it might be perceived that an obligation is created, or a favor is expected. The giving and receiving of gifts and promotional items of modest value is acceptable as is reasonable entertainment, if within the limits of responsible and generally accepted business practices. Never solicit or accept a personal benefit as a condition of performing your duties.

5. Policy Compliance

a) Compliance Measurement

Compliance with the Code is mandatory. You are expected to be familiar and comply with the Code in the performance of your duties, including co-operating in any investigation of misconduct. As well, you are expected to understand your obligations under MECPL policies.

b) Exception

c) Non-Compliance

Interested parties, those who fail to abide by this Code and MECPL policies will be subject to disciplinary action, up to and including dismissal or prosecution.

6. Related standards, Policies and Processes

The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
Universal Declaration of Human Rights (UDHR)
UN Global Compact
OECD Guidelines

7. Definitions & Terms

Maxop Engineering Co. Pvt. Ltd. (herein called "MECPL")

8. Revision History

Policy Amendment History			
Sl. No.	Amendment No.	Amendment Date	Amendment Details
1	01	01-10-2022	Ethics word added in code of conduct policy
2	02	01-07-2024	Revised and restructured



Mitesh Gera
COO