PUKHRAJ ADDITIVES LLP

CODE OF CONDUCT POLICY

Document No: PAL/POL/24 Issue date: 01.07.2023 Rev. No & date: 02/01.04.2026

Purpose

Pukhraj Additives LLP is committed to maintaining the highest standards of integrity, professionalism, ethical conduct, and legal compliance in all business activities. Every employee is expected to conduct themselves responsibly and uphold the Company's values while interacting with fellow employees, customers, suppliers, contractors, visitors, and other stakeholders.

This policy establishes the standards of behaviour expected from all employees to promote a safe, respectful, ethical, and productive workplace. It outlines the Company's expectations regarding professional conduct, compliance with Company policies, confidentiality, conflict of interest, workplace behaviour, and the responsible use of Company resources and information.

The Code of Conduct forms the foundation of our workplace culture and supports our commitment to quality, customer satisfaction, occupational health & safety, environmental responsibility, and continuous improvement.

Policy

This Code of Conduct applies to all employees, trainees, contract employees, consultants, and contractors working for or on behalf of Pukhraj Additives LLP.

Every individual is expected to comply with applicable laws, Company policies, procedures, and lawful instructions issued by the Management. Employees are expected to perform their duties with honesty, professionalism, accountability, and respect while protecting the interests, reputation, confidential information, and assets of the Company.

Employees who, in good faith, report suspected misconduct, unethical behaviour, safety concerns, or violations of Company policies shall not be subjected to retaliation. All reported concerns shall be handled fairly, confidentially, and in accordance with the Company's grievance and disciplinary procedures.

Failure to comply with this policy may result in disciplinary action, including counselling, written warning, suspension, or termination of employment or contractual engagement, depending on the nature and seriousness of the violation.

Where necessary, disciplinary actions shall be taken in accordance with the Company's HR policies, disciplinary procedures, and applicable laws.

Employees requiring clarification regarding any aspect of this policy should consult their Reporting Manager or the Human Resources Department.

Nothing contained in this policy shall override any applicable statutory or legal requirement. Where any provision of this policy conflicts with applicable law, the relevant legal requirement shall prevail

Code of conduct

Every employee is expected to maintain the highest standards of professional conduct and shall:

1. Act honestly, ethically, and with integrity in all business activities.
2. Perform assigned duties with professionalism, competence, accountability, and due care.
3. Comply with all applicable Company policies, procedures, statutory requirements, and lawful instructions.
4. Maintain the highest standards of quality, occupational health & safety, and environmental protection while performing assigned duties.
5. Wear the prescribed uniform and personal protective equipment (PPE) wherever required and comply with all workplace safety rules.
6. Treat fellow employees, customers, suppliers, contractors, and visitors with dignity, courtesy, fairness, and respect.
7. Promote teamwork, cooperation, and a positive working environment free from discrimination, harassment, intimidation, or violence.
8. Protect Company assets, equipment, materials, records, and confidential information from misuse, loss, theft, or unauthorized disclosure.
9. Use Company resources, machinery, tools, computers, internet facilities, and communication systems responsibly and only for authorized business purposes.
10. Avoid any actual, potential, or perceived conflict of interest and immediately disclose such situations to the Reporting Manager or Human Resources Department.
11. Not engage in any outside employment, business activity, or financial interest that conflicts with the Company's interests without prior written approval from Management.
12. Maintain confidentiality of all Company, customer, supplier, employee, technical, commercial, and financial information obtained during employment.
13. Not solicit, offer, or accept gifts, cash, commissions, favours, or other benefits that may improperly influence, or appear to influence, business decisions or professional judgement.
14. Report unsafe conditions, accidents, incidents, near misses, quality concerns, security breaches, or unethical practices immediately to the appropriate authority.
15. Not report for duty or remain at work while under the influence of alcohol, illegal drugs, or any substance that may impair judgement, performance, or workplace safety.
16. Comply with all Company rules relating to the use of mobile phones, photography, videography, social media, and information security.
17. Protect the Company's intellectual property, trade secrets, proprietary information, and business reputation at all times.
18. Notify the Human Resources Department if convicted of any criminal offence or if any change

in personal circumstances may significantly affect their employment or the reputation of the Company.

19. Conduct themselves in a manner that upholds the values, reputation, and business interests of Pukhraj Additives LLP at all times.
20. All employees performing office and corporate work shall wear the prescribed company uniform or appropriate formal attire that provides proper and professional coverage, along with suitable footwear. Employees working on the plant shop floor shall wear the prescribed company uniform and all required personal protective equipment (PPE) appropriate to their work activities. Torn, damaged, inappropriate, or incomplete clothing, including half dress, is not permitted.

External stakeholder code of conduct

Pukhraj Additives LLP is committed to conducting business with integrity, fairness, transparency, and mutual respect. The Company expects all customers, suppliers, contractors, consultants, transporters, service providers, visitors, and other external stakeholders conducting business with or on behalf of the Company to comply with applicable laws and regulations and uphold the highest standards of ethical business conduct.

External stakeholders are expected to conduct their activities honestly and responsibly; prohibit child labour, forced labour, discrimination, harassment, bribery, corruption, and any unethical or illegal practices; provide safe and healthy working conditions for their employees; respect human rights; protect confidential information and intellectual property; comply with applicable environmental, health, safety, and labour laws; and avoid any actual or potential conflict of interest that could adversely affect the Company's business or reputation.

Stakeholders are encouraged to report any suspected violation of this Code of Conduct or applicable laws through the Company's External Whistleblower Mechanism or External Grievance Redressal Mechanism. Pukhraj Additives LLP reserves the right to review compliance with this Code and may take appropriate actions, including suspension or termination of business relationships, where serious or repeated violations are identified.

Approved By

Karina Nagpal
Managing Partner
Pukhraj Additives LLP