



ETHICAL POLICY

COM / MGMT / ORG / 176
VER : 01; REV: 00
DATE : 01.04.2021

Ethical Policy

We at “MANJUSHREE” are committed to encourage an organizational culture at highest standards of ethics and integrity at all levels with due diligence to prevent and detect unlawful and unethical conduct. We work hard to integrate ethical concerns into business practices and follow a clear Code of Conduct, instructing all our employees, as how the business should be performed under best practices and principles of corporate governance.

This ensures that we create value by fulfilling our commitments to our vendors, customers, employees and society in which we operate and act with sound and effective corporate values.

Objective

We have adopted this ethical policy described for the common standards to our employees. The elements of ethical policy are such as:

- Maintaining Business Integrity and Principles
- Prohibiting Child Labour and support
- Eliminate Bribery and Corruption
- Free, prior and Informed Consent (FPIC)
- Managing Confidential information
- Money Laundering
- Complying Statutory Requirements
- Ensuring Harassment free Workplace
- Community Development
- Non-disclosure of price sensitive information
- Equal Opportunity for All Employees
- Ensuring intellectual property rights
- Avoid Conflicts of Interest
- Fraud Prevention
- Communication Mechanism
- Reporting Violations

This ethical policy can be implemented by promoting a clear Code of Conduct outlined below. Adherence to these values and principles is not only mandatory for organizations but also for our employees.

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Code of Conduct:

Business Integrity and Principal:

“MANJUSHREE” commits, that all employees work with full integrity, trust, fairness and professionalism. We respect the interests of our stakeholders (clients, employees, shareholders, suppliers, and government authorities) and of society as a whole. We also honor our commitments and promises. We are committed to maintaining profitability, a strong financial foundation in order to meet our responsibilities. We do not sacrifice compliance with laws and commitment to our responsibilities or take undue risk for the sake of profits

Child labour:

At Manjushree, we strive to ensure that the fundamental rights of children are protected and that they are accorded the opportunity to go after their dreams and aspirations. At Manjushree, we believe in eliminating the need for child labour. We do reliable and regular checks on our workplaces. We also try to ensure our suppliers and transporters do not use child labour.

Commissions, Gifts, Benefits and Entertainment:

We are strongly committed in observing the highest ethical standards in all its procurement activities. This code has been prepared to provide clear summary of our expectation from the suppliers in all procurement dealings, ensuring that recognized procurement ethics are followed.




Transparency and accountability should be strictly adhered in all procurement activities. Our procurement ethics focuses on zero tolerance on corruption and bribery to concerned authority w.r.t procurement of business, avoiding any form of conflict of interest and honest representation of our capabilities.

No supplier is allowed to offer any commission, gift, benefit and entertainment directly or indirectly, in cash or in kind, to any of our Employee, or to any family member of our Employee.

Manjushree competes fairly. Manjushree is also committed to avoid any unfair means and deals with our competitors legally and ethically.

Free, prior and Informed Consent (FPIC)

We ensure that all the requirements of FPIC are fulfilled and necessary steps are taken to keep safeguard to heritage and culture of indigenous people in the locality. Declarations were made, signed by Management in relation to compliance and uploaded in portal.

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Confidential information:

We ensure that all commercial and business information of our customer is secured against loss, misuse or un-authorized access, modification or disclosure.

We shall maintain the confidentiality, integrity and security of all commercial and business information, for which we are responsible.

We shall keep in strict confidence all communications, technical or commercial know-how, specifications, inventions, processes or initiatives, which are of a confidential nature as have been disclosed by our customers to us.

We may disclose the above mentioned information to its employees, representatives or subcontractors who need to know such information for the purposes of carrying out the obligations towards our customer.

Money Laundering:

Money laundering is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. Manjushree does not allow / participate in any form of money laundering. If an employee encounters a situation or transaction in which the origin of the funds offered to Manjushree or from Manjushree seems suspicious, the employee is directed to immediately seek advice of his/her senior and the origin of the funds shall be verified to be acceptable before proceeding.

Statutory Compliances:

We comply with all applicable laws, rules, regulations, policies of the country diligently in full including but not limited to Taxation laws, Contract Labour Regulations and Prohibition Act, Employees states Insurance Act, Environment health & safety Act, Child Labour Act, Equal remuneration Act, Sexual Harassment of women at work place Act and other Acts as may be applicable from time to time.

Community Development:

We encourage our employees to engage in community activities E.g. Work towards the social, educational, humanitarian and cultural development of community, engage in Charitable work etc.

Non-disclosure of price sensitive information:

We shall not use or proliferate any information which is considered to be price sensitive information with our customer.

Price sensitive information may include the following:-

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- Restructuring plans
- Acquisition and divestiture of businesses or business units
- Financial information such as profits, earnings and dividends
- Raising finances
- Asset revaluations
- Announcement of new product introductions or developments
- Investment decision/plans

Natural justice, Fairness and Equity:

We ensure and demonstrate practices to promote equal opportunities for and treatment of our employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age.

We investigate complaints or issues, act promptly, and in fair manner. The principles of natural justice must be maintained in dealing with each investigation.

Harassment Free Workplace

Harassment includes offensive verbal, physical, or visual behavior and actions directed toward an individual, based upon the individual's gender, color, race, ethnicity, religion, age, disability, pregnancy, sexual orientation, gender identity and expression. Any comments or conduct that fails to respect the dignity and feeling of the individual are unacceptable at Manjushree. Strict action can be taken against the person who convicted for such misconduct as per organization's rule.

Use of Facilities, Machinery, Equipment's:

We take all possible care, when using Customers property, goods, and intellectual property rights and ensure that we are using efficiently, carefully and honestly. Unless a written permission has been granted at appropriate level from our customer, such resources cannot be used for private or for any other purposes.

Conflicts of Interest:

We expects all management and all of our staff to be free from actual or potential conflicts of interest. A conflict of interest occurs whenever the prospect of direct or indirect personal gain may influence or appear to influence judgment or actions while doing business with customer

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Fraud Prevention:

We shall implement robust fraud prevention and reporting programmes. We may report to customer all occurrences of fraud (actual or under investigation) involving their business.

Communication Mechanism:

Implementation of the policy in the organisation and awareness among the employees to be ensured by:

- Immediate Supervisors
- Quality Management System
- Human Resource Development
- Management

Through:

- Orientation Program
- Training & Education

Reporting Violations:

Report to “**MANJUSHREE**” management of any misconduct or any potential violation of Code by our employee / stakeholders in relation to us. Prompt reporting of violations is in the best interest of everyone. Reports will be handled as confidential as possible or you may anonymously report such incidence online through dedicated email id at: coc@manjushreegroup.com

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