



DTL Ancillaries LTD.

CODE OF CONDUCT POLICY

CORPORATE OFFICE: 1st Floor, Kohinoor Center, Above HDFC Bank, Chakan, Pune – 410 501

PRODUCTION FACILITIES:

- 1. Unit 1** – Gat No.366, Kharabwadi,Chakan, Pune – 410 501
- 2. Unit 2** – Plot No.43, WMDC Indl. Area, Kharwadi, Chakan, Pune – 410 501
- 3. Unit 3** – Plot No.373/01, WMDC Indl. Area, Kharwadi, Chakan, Pune – 410 501
- 4. Unit 4** – Plot No. 2003, Ambethan Road, Chakan, Pune – 410 501

| CODE OF CONDUCT | |
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| NAME OF POLICY | Code of Conduct Policy |
| SECTION | (II) Discipline/Compliance |
| POLICY NO. | 8 |
| VERSION | 01 |
| DATE OF ISSUE | January 2014 |
| APPROVED BY | |

8.1. OBJECTIVE:

The objective of this policy is to establish basic rules of work discipline and ethics at DTL Ancillaries Ltd. All employees are required to observe the code of conduct specified in this document. The violation of this code or acts of omission/commission leading to violation of this code, will be considered a serious offence by the company and will lead to disciplinary action which may even affect the continuance of the individual's employment in the Company.

8.2 CONFIDENTIAL MATTERS:

No employee shall divulge or use, except in furtherance of the Company's business, any business or technical information that may come to their knowledge in the course of their employment in the Company or its associates companies. The employee both in letter and in spirit should follow any agreement entered into by the Company.

No employee of DTL, except if it is necessary in the course of his/her duty, shall without prior written consent of the Company, retain in his/her private possession, any papers/ documents/specifications, records, etc. relating to the Company's business. Any such material must be returned to the Company on severance of services.

No employee shall acquire any intellectual property rights (Patent, Copyright, Trademark, etc) in relation to any services/products/goods which the Company makes or may make in the course of his/her employment.

8.3 COMPLIANCE WITH LAWS:

The Company attaches high degree of implicit statutory compliances and the employees should ensure compliance with various statutory in his/her area of operation. No employee shall participate in or be associated with any radio/television broadcast, publication, communication to the press or public speeches/utterances without prior approval of the MD/equivalent if such an appearance involves the employee appearing in his official capacity, involves disclosing business/technical information of the Company or even if the appearance involves the relationship of the employee with the Company being mentioned.

8.4 PRIVATE TRADE/EMPLOYMENT:

Permanent employees of the Company shall not, except with prior written permission of the MD, engage either directly or indirectly in any trade or business or undertake any other employment or consultancy or undertake such trade/business/consultancy, etc. on behalf of anyone else, either with or without remuneration during the course of his/her employment with the Company.

Although an employee may, with prior approval, undertake honorary work of social, charitable or religious nature or occasional work of literary, artistic nature, subject to the condition that such work does not interfere with the performance of his/her duties and undertakes to discontinue such work if so directed by the company in its sole discretion.

8.5 GIFTS FROM SUPPLIERS/CUSTOMERS:

Any gift so received from any supplier, contractor, customer, or from any person or organization with whom this company has business dealings, other than near relatives or personal friends having no official dealings with the company shall, immediately be declared and surrendered to the Company for disposal.

This will, however, exclude New Year or Seasonal gifts in the form of table items, key chains, etc.

8.6 DEALINGS WITH COMPANY'S SUPPLIERS/CUSTOMERS:

No employee will have, either directly or indirectly, any business arrangements outside the ambit of the company's dealings, or use his/her position for any

personal benefits or for any benefits to any friend or relation, with/from any of the Company's customers/agents/suppliers

All employees are directed to declare the extent of their interest, their business and personal relationship with the Company's present suppliers of goods/materials/services (including consultants).

If, in future, there is a likelihood of any conflict of interest on this account, prior written approval of the Company will be necessary and the decision of the Company will be final and binding.

Concealment of such information will be viewed with seriousness by the Company and may lead to termination of services from the company.

8.7 MISCONDUCT:

The following acts will be treated as misconduct and will attract the severest punishments up to and including termination of services:

- Disobedience either alone or in association with others
- Taking bribes, causing sabotage and willful damage, theft or fraud in connection with Company's work or property.
- Giving false information or concealing information regarding age, qualifications, previous employment etc.
- Habitual late attendance or habitual absence from duty
- Habitual neglect of work or negligence.
- Smoking in prohibited areas.
- Refusal to accept any communication from the Company.
- Acting in a manner intended to bring discredit to the Company.
- Drinking/gambling/creating nuisance in the premises.
- Spreading false rumors, giving false information, or such other acts of indiscipline.
- Money lending/borrowing activities on the premises of the Company.

- Writing of anonymous letters/emails or pseudonymous letters/emails or associating with the writing of such letters/emails.
- Striking work or inciting others to strike work or other acts subversive of discipline.
- Threats, coercion, intimidation, using abusive and vulgar language.
- Conviction in court of law for any criminal offence involving moral turpitude.
- Habitual breach of the laws of the land.
- Breach of instructions for the maintenance and operations of any office equipment / department.
- Financial misappropriation and/or fraud.
- Unauthorized removal of company's documents/ drawings/ property from place of work.
- Willful false claims/exaggerated claims.

The above list is only indicative and not exhaustive. All employees are advised to refrain from any acts of omission or commission, which could be viewed as misconduct by the Company.

8.8 CONSUMPTION OF INTOXICATING DRINKS/DRUGS:

Every employee shall take care that he/she does not report to work under the influence of alcohol or drugs.

Every employee shall take due care that the performance of his/her duties is optimum. In any way there should be no influence of intoxicating drinks or drugs.

8.9 OTHER FORMS OF DISCIPLINE:

Other forms of discipline are discussed in this section. Non-compliance to any of these would become cases of indiscipline when a pattern of behavior is observed by your manager(s) and not a single incident. Accordingly, appropriate disciplinary action may be taken.

- ***Commitment Discipline*** - Employees are expected to honor commitments made whether to internal or external customers. Consistently failing to meet professional commitments made amounts to indiscipline.
- ***Protocol Discipline*** - Consistently bypassing established channels of work flow and communication, insubordination and/or taking undue advantage of confusion in reporting relationships to gain undue personal advantage to the detriment of others or as an excuse for non-performance, amounts to indiscipline.
- ***Customer Responsiveness*** - Consistently failing to respond to customer needs or to meet commitments made to customers beyond reasonable time / committed time amounts to indiscipline.

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