

CODE OF CONDUCT



CODE OF CONDUCT

Policy Owners	All Eligible employees
Policy Administration	Human Resources
Initiated by	Human Resources
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CODE OF CONDUCT

PURPOSE

The Employee Code of Conduct outlines standards of personal and professional conduct that all employees must strive to uphold as also the standard of behaviour for high ethical and professional conduct at all times. The Code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination. It will also assist managers to induct employees into SYMBIOTEC GROUP OF COMPANIES and address any circumstances that may arise which conflict with the stated standards and Values. The policy is to promote understanding of what is considered acceptable and unacceptable conduct and behaviour; and to encourage consistency throughout the company. Contravention of this Code is a serious matter to the Company and will be treated as such.

SCOPE

The Employee Code of Conduct provides clear guidelines and standards for the appropriate behaviour expected of Employees of SYMBIOTEC GROUP OF COMPANIES, Directors, including consultants and retainers working and representing SYMBIOTEC.

PROCESS

This Code of Conduct provides a framework for appropriate behaviour for all the Company's employees, in which employees & management:

- Conduct themselves towards other employees or colleagues, employees representatives and their representatives
- Government authorities, Clients, Customers, Business Partners and External Agencies.
- Perform their duties and obligations
- Fulfil the mission, goals and objectives of SYMBIOTEC GROUP OF COMPANIES and
- Practice fairness and equity.

The Code of Conduct is established on the following organisational values:

- Integrity
- Performance
- Conscientiousness
- Compassion
- Teamwork
- Fairness
- Respect

Individuals must be responsible for their own behaviour consistent with these values within the provisions of this code, Company's other policies, legislation and relevant industrial clauses that apply to individual contracts of employment.

Where there is doubt as to the application of the Code, or the appropriate course of action to be adopted, employees affected should discuss the matter with their supervisor.

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1. MANAGERS/SUPERVISORS RESPONSIBILITY

Managers are responsible and accountable for:

- Undertaking their duties and behaving in a manner that is within the provisions of the Employee Code of Conduct
- Informing employees in their teams about the Employee Code of Conduct, relevant policies, procedures.
- Providing appropriate training and/or performance counselling to ensure the required standard is met.
- Reporting any departure from Employee Code of Conduct noticed by themselves or by others to HR Department.
- Acting consistently and fairly in dealing with behaviour that breaches this code.

2. EMPLOYEES RESPONSIBILITY

All employees have a responsibility to:

- Be personally responsible and accountable for their own performance, behaviour and attendance in the workplace
- Undertake their duties and behave in a manner that is consistent with the provisions of the Employee Code of Conduct.
- Report any departure from the Employee Code of Conduct noticed by themselves or by others.
- Comply with Company's values, policies and procedure.
- Promote a positive, safe and healthy environment in the conduct of their work.

3. PERSONAL CONDUCT

Attendance and punctuality:

- Employees are expected to be punctual and regular in their attendance.
- When an employee is unavoidably absent from work due to sickness or any other reason, the employee should telephone their manager (or appropriate delegate) promptly (preferably before their normal starting time) and indicate their likely return to work.
- Employees wishing to extend their leave must arrange this before commencing the leave. If the employee is on leave, they must speak to their immediate manager at least 2 working days before their leave ends.

4. PERSONAL AND PROFESSIONAL BEHAVIOR

Employees should perform the duties associated with their position to the best of their ability, diligently, impartially and conscientiously. In the performance of their duties, employees should:

- Maintain high level of ethical standards at the workplace and performance of duties.
- Comply with legislative and industrial obligations and administrative policies.
- Fulfil their Equal Employment Opportunity and Occupational Safety & Health obligations.
- Strive to keep up to date with advances and changes in the knowledge and the professional and ethical standards relevant to their areas and expertise.
- Maintain adequate documents to support decisions made.
- Treat all persons including customers, business partners, among others, with respect to their rights and provide all necessary and appropriate assistance.
- Not take or seek to take improper advantage of any official information gained in the employment with SYMBIOTEC GROUP OF COMPANIES
- Not harass or discriminate against employees or in work practices on the grounds of sex, pregnancy, race (including colour, ethnic background or national identity), marital status, disability, sexual preference, political or religious belief, or age
- Act responsibly when becoming aware of any unethical behaviour or wrongdoing by any employee. Such information should be forwarded to the HR Dept.
- Competent performance and completion of all jobs and duties that are assigned to the employee.
- Continuously improve work performance. All employees should actively pursue quality improvements
- Perform as part of the Team to meet departmental and organisational goals.

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- Do not use any abusive language or any kind of physical violence with colleagues, superiors and subordinates.
- Do not share any confidential information that he/ she has access to with any outsiders or third party without proper approval.
- Always declare any conflict of interest to HR department well in advance.
- Use of any kind of threat direct or implied is forbidden.
- Cannot make any comments or pass any remarks or demand any action on employee's performance, if the employee does not belong to his/her Department. In case of unsatisfactory performance, they can highlight this issue to the Departmental head of the employee for necessary action.

5. INAPPROPRIATE CONDUCT AND BEHAVIOUR

- Loitering or loafing;
- Leave work early or leaving department without supervisor's permissions;
- Using obscene, abusive language;
- Spreading malicious gossip or rumours;
- Harassing, threatening, intimidating, coercing any person at any time;
- Horseplay or throwing objects;
- Reporting to work or working while under the influence of alcohol, drugs, or prohibited substances;
- Creating or contributing to unsanitary conditions;
- Gambling, lotteries, or any other game of chance while on company premises;
- Insubordination;
- Excessive personal use of telephones or computer facilities.

6. DRESS AND APPEARANCE

We are well-recognised and respected Company projecting a positive image to our clients. Employees must, therefore, ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is expected at all times.

Where a uniform is provided, it must be worn in accordance with the Company's requirements. When wearing a uniform to and from work, employees are expected to conduct themselves in a responsible and professional manner by wearing casual business wear. The manager is responsible for determining the dress code appropriate to the environment while the manager can make exceptions for medical purposes.

Formal business wear is defined as:

- trousers, pants, skirts
- modest shirts, blouses, jumpers, cardigans, non-sports jackets

Formal business wear does not include:

- denim jeans or leggings
- any form of sports shoes (including joggers or runners), slippers or dilapidated footwear
- athletic wear
- torn or ripped clothing (even if 'designer' tears)
- unsuitably revealing clothing (including backless tops or dresses, or garments that reveal the midriff)
- any clothing displaying offensive messages including racist or objectionable matter.

However, wearing of casual business wear is not applicable on weekends (Fridays / Saturdays) unless there are meetings scheduled on the weekends. The employees are allowed to wear outfit of their choice which should be appropriate and acceptable. However on some special occasions like Dipawali employee should wear appropriate outfits as per pre decided dress code

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7. USE OF FACILITIES AND EQUIPMENT

Employees should take all possible care when using SYMBIOTEC GROUP OF COMPANIES property, goods, intellectual property and services and ensure they are used efficiently, carefully and without any damage except normal wear. Unless permission has been granted by the management of SYMBIOTEC GROUP OF COMPANIES, resources are not to be used for private purposes.

8. RECORDS MANAGEMENT

Employees need to be aware of their record keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures.

No false or artificial entries shall be made in any records of the Company for any reason.

All employees must, therefore, ensure that SYMBIOTEC GROUP OF COMPANIES documents are not placed in unofficial or private filing systems but placed in official files only.

Employees must not remove documents from official files without prior approval from his/her Dept Head. These documents are controlled records, and must be complete, up-to-date and capable of providing organisational accountability when officially scrutinised.

Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule, which has been approved by the site Head / CMD or their Nominee.

9. INFORMATION SECURITY

Employees are not authorised to open personal mail or any site related to Job offers, music, Porn contents, any kind of trading, among others. Employees must not access information which they are not authorised to access or use, and must not allow any other person access for any reason.

Employees must take all reasonable precautions, including password maintenance and file protection measures to prevent unauthorised access and have an obligation to maintain the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement. Employee can not exchange or share any information, files in soft copy or hard copy with outsiders for personal use. Any sharing of information with people outside the company for personal use must be brought to the notice of the employee & should be reported to the Supervisor.

Staff may only use e-mail and web browsing for work related purposes and that all e-mail and web access logs will be monitored for compliance with the staff position. As the organisation has responsibility for its computer systems and networks, it has the right to make directions as to its use.

10. EXTERNAL EMPLOYEMENT

SYMBIOTEC GROUP OF COMPANIES restrains its employees from working outside business hours since this undermines or compromises the interest of SYMBIOTEC GROUP OF COMPANIES Employees should not engage in outside employment, since this may:

- Places them in conflict with their official duties, or would lead to the perception that they have placed themselves in conflict with their duties;
- Is likely to affect their efficiency in the performance of their duties; or
- Involves the use of SYMBIOTEC GROUP OF COMPANIES resources for private purpose without authorisation or recompense.

Subject to current policies, employees may not accept outside payment for any activities.

11. FINANCIAL INTEREST

Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or SYMBIOTEC GROUP OF COMPANIES objectives or activities.

Financial conflict of interest may arise where an employee, who has a financial interest in a Company or other business, is in a position to influence contracts or transactions between

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SYMBIOTEC GROUP OF COMPANIES and that business. This conflict may extend to any business undertaking in which employees and their immediate family or the employees is acting in direct competition with SYMBIOTEC GROUP OF COMPANIES activities or interests for personal gain.

12. ACCEPTANCE OF COMMISSIONS, GIFTS OR BENEFITS

Employees should not accept a gift, secret commission or a benefit from a person or organisation outside Symbiotec Group of Companies if the intent of the gift or the benefit is to induce the employee to waive or reduce requirements or to extend a financial or other benefit to a person or organisation outside Symbiotec Group of Companies to the detriment of Symbiotec Group of Companies interests.

As a general rule, no employee should accept a gift or benefit if it could be seen as intended or likely to cause that person to:

- perform their job in a particular way, which the person would not normally do, or
- Deviate from the proper or usual course of duty.

Employees may accept token gifts or benefits in circumstances approved by the Human Resources / CMD or a nominee, provided that there is no possibility that the employee might be perceived to be, compromised in the process. Gifts of a nominal value (Calenders, Diary or any table item, which cost less than 1000 Rs.) generally used for promotional purposes by the donor, or moderate acts of hospitality may be accepted by employees.

The employee must advise their manager of any gifts and benefits they have received as soon as the gift or benefit is received and must not take advantage or seek to take advantage of their position to obtain a benefit, either for themselves or for someone else.

13. RELATIVES AND CLOSE FRIENDS

A conflict of interest may arise where an employee makes or participates in decisions affecting another person with whom they have a personal relationship (such as a relative, spouse, close friend or personal associate).

In cases where a conflict may arise, employees must advise their manager. Wherever possible, employees should disqualify themselves from dealing with those persons in such situations.

14. ALCOHOL AND SUBSTANCE ABUSE OR MISUSE

Employees must ensure that the safety and health of other employees, volunteers and clients are not endangered by any misuse. SYMBIOTEC GROUP OF COMPANIES expects employees to perform their jobs with skill, care and diligence. Employees should not perform any act or omission that is likely to have a detrimental effect on their work performance and that of other employees and clients. Accordingly, employees should not be under the influence of alcohol or other substances while they are at work or at work functions.

Possession, use or trafficking in illegal drugs on the premises is not permitted. Symbiotec Group of Companies premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces. Any such activity will be immediately referred to the police and SYMBIOTEC GROUP OF COMPANIES may take disciplinary action, which may include termination of employment.

Employees must notify the manager if the taking of, or failure to take, prescribed medication is likely to affect their performance and/or affect the safety of any person at the workplace. This is to ensure workplace safety is not jeopardised and that any performance impact is properly managed. It is the responsibility of employees to follow the directions/precautions for any drugs prescribed by a health professional for individual use and/or commercially available preparations that may impact their capacity.

15. SMOKING

Passive smoking can impact on other employees, the community and create a poor image of SYMBIOTEC GROUP OF COMPANIES which does not promote or encourage smoking. Smoking is not permitted Symbiotec Group of Companies owned or leased vehicles or buildings.

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Employees may only smoke in their own time during authorised breaks as set out in the award, agreement or employment contract and/or as authorised individually by their manager.

16. POLICIES

Employees are responsible to carry out and comply with SYMBIOTEC GROUP OF COMPANIES policies and procedures and legislation. It is acknowledged that employee views, on particular matters, may differ from Symbiotec Group of Companies however such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting SYMBIOTEC GROUP OF COMPANIES objectives.

17. DISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY (EEO)

Anti-discrimination laws provide guidelines on respecting personal differences. Treating people differently on the basis of personal characteristics is unlawful. The following are examples of attributes: age, industrial activity, parental status, political belief, personal association, race, ethnic background, career status, marital status, pregnancy/potential, lawful sexual activity, unrelated criminal record, impairment, religious belief/activity, physical features, gender identity, disability and sex.

Discrimination is unacceptable conduct within Symbiotec group of companies and all reported incidents will be investigated.

If an employee is required to investigate complaints against other employees or issues affecting employees, they must act fairly and in a timely manner. The principles of natural justice must be maintained in dealing with each investigation.

18. HARASSMENT

Harassment is any type of behaviour that:

- The other person does not want and does not return
- offends, embarrasses, or scares them, and may be either sexual or non sexual in nature
- Targets them because of their race, sex, pregnancy, or other protected attribute under the law
- Constitutes a form of bullying
- Verbal abuse, shouting
- Excluding or isolating behaviour
- Deliberately withholding information vital for effective work performance
- Giving employees impossible assignments
- Physical abuse
- Belittling an employee because of his level

Harassment does not have to be a series of incidents or an ongoing pattern of behaviour. Neither does harassment need to be intentional to attract disciplinary action. Harassment can occur in any work related context including:

- Social functions
- Conferences
- Office social gatherings
- Business trips

Harassment and discrimination form part of a continuum of unacceptable behaviour that can include sexual assault, stalking and harassing phone calls, some of which are also offences under criminal law, which means the police may prosecute anyone who commits such acts.

Normal discipline, performance counselling or workplace control practices based only on performance issues do not, in themselves, constitute harassment.

19. OCCUPATIONAL SAFETY AND HEALTH

Symbiotec Group of Companies is committed to providing a safe and healthy workplace for all employees and visitors; however, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far as is reasonably practical.

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It is, therefore, important that employees are familiar with the standards or procedures in their particular area of work. If employees have not been advised of these standards or procedures during the induction process, they must, as a matter of urgency, ask their immediate manager to provide them the necessary information.

All employees are responsible for:

- knowing and complying with the OSH rules and guidelines
- working so as not to endanger themselves or any other person by any act or omission
- use and follow OSH instructions, training or other information
- report all incidents, accidents, injuries and hazards to management for action

20. OWNERSHIP OF PRODUCTS AND COPYRIGHT

All products, literary, dramatic, musical, cinematographic and artistic works, computer programs, material in written or other format, discoveries, inventions and improvements in relation to such matters, together with all copyright and intellectual property created, authored, discovered, developed or produced by the employee for the purpose of, or in the course of, the employee's employment will remain the property of the Symbiotec Group of Companies and will not be used by the employee other than for the purpose of business.

Unless otherwise agreed, the Symbiotec retains the copyright of work produced by you during your employment with the Symbiotec Group of Companies

Upon termination of employment, the employee will return all correspondence, documents, data, information, equipment and things, including copies thereof, belonging to the employer that may be in the employee's possession, custody or control.

21. PUBLIC CONDUCT AND MEDIA CONTACT

Employees making comments in a public forum on any matter relating to Symbiotec Group of Companies must act in a way that is in keeping with the values and protects the reputation of Symbiotec. Only authorised personnel may speak with the media on behalf of Symbiotec Group of Companies. Employees are not permitted to speak with media representatives without first receiving clearance from the MD or the Authorised Person.

22. MISUSE

Employees must not deliberately misuse SPL equipment, assets, or the services of other Company's personnel. When using equipment, employees are required to follow the instructions provided in order to avoid personal injury and/or maintenance and replacement costs. Examples of misuse include:

- Copying computer software programs regardless of whether or not the programs are protected by copyright
- Use of Symbiotec Group of Companies letterhead paper or postage when corresponding on personal or other matters not directly related to the Symbiotec Group of Companies .
- Unauthorised use of Symbiotec Group of Companies logos.
- Falsifying, manipulating or destroying business records without specific authorisation using Symbiotec Group of Companies equipment for personal commercial gain

Employees provided with vehicles (private or commuter use) are expected to use them in accordance with Symbiotec Group of Companies policy and guidelines.

23. CONFIDENTIALITY

Employees may have access to commercial information relating to individuals, the public, or the financial or other operations of the Symbiotec Group of Companies . This information is to be used for Company purposes only and should remain secure and confidential. It is important that the Company has confidence that information acquired by Symbiotec Group of Companies is only used for the stated purposes for which it was collected.

Employees must not discuss or release to any unauthorised person and/or anyone outside of the Company, any confidential or sensitive information relating to the Symbiotec Group of Companies and/or its operations.

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24. GRIEVANCE HANDLING

It is expected that as a first step, employees will attempt to resolve the issues between themselves. Where this is not appropriate or does not result in a satisfactory resolution, a more formal procedure as outlined in the Grievance – Resolving Issues and Concerns Policy can be applied.

The dispute resolution process will operate within the following principles: Confidentiality, Impartiality, Promptness, Sensitivity, Courtesy and Respect.

Disputes may be resolved in a formal or informal manner. Where possible, as a first step and with the agreement of both parties, the dispute may be resolved informally. If the dispute is not resolved at the informal level, then the formal process provides graduated steps for further discussion and resolution at higher levels of authority. A formal resolution requires a thorough investigation to be undertaken, and the process documented.

Appropriate managers will investigate a complaint or allegation of behaviour that is contrary to these standards. Investigations will be carried out with sensitivity and fairness maintaining confidentiality.

The following list is not meant to imply any chronological order for action. The action taken should be entirely up to the concerned Supervisor, Head of Department. The action includes:

- Reporting breaches of Code of confidential, anonymous basis. If the employee wishes to report a potential or actual breach of this Code on a confidential anonymous basis, you should promptly submit a verbal or written report to the Supervisor/ Manager/ Head of Department. Any such breach of Code can be reported on an anonymous basis to the grievance@symbiotec.com id. All such grievances will be directed to the Compliance Officer of the Company.
- The designated person who received the complaint will speak to the individual(s) deemed responsible, directly identifying the problem, and seeking to resolve the concern.
- The designated person who received the complaint will speak to the appropriate supervisor, department head or manager for the individual or individuals about whom the complaint is being made.
- If further action is required, a meeting will be set up with the parties concerned and with designated person in charge of applying, mediating and issuing orders or dispute resolution related to the code of conduct of policy. Results of this meeting are to be held confidential by all parties with reports going only to those individuals acceptable to both parties.
- That designated person must establish a formal enquiry to validate the complaint and advise the Head of the Company or whoever is in authority in regard to an appropriate reaction. The nature of such an enquiry process will be at the discretion of Head of Department or whoever is designated by the Authority.

Monthly HR Department will take status of all complaints and reports in terms of:

- The number of cases/complaints reported or received during the month.
- The number of cases/complaints disposed off during the month.
- The number of cases/complaints pending at the end of the month.
- The nature of action taken on the cases/complaints disposed off and in respect of those pending for disposal.

The company is committed to maintaining anonymity and protection of the person or the whistle-blower who registers complaint/grievance with respect to violation of Code or a fraud or bribery or a possibility of such incidence in the Company.

25. BREACHES OF THE CODE

Symbiotec Group of Companies is committed to the standards set out in the Employee Code of Conduct. Where a breach of the Code has been identified by Symbiotec Group of Companies, a response to the breach may result in:

1. counselling
2. suspension
3. disciplinary action
4. termination of employment or
5. Laying of Criminal charges or civil action.

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26. FRAUD

Every employee of Symbiotec Group of Companies shall promptly report to the Supervisor or to grievance.symbiotec.in email id, when she/ he becomes aware of any actual or possible violation of the Code or an event of misconduct, or act of fraud or an act not in the company's interest. Such reporting shall be informed by the Supervisor to the Head of Department who in turn will keep the HR Department informed, if she/ he think fit & appropriate. The HOD or HR Department shall investigate all such complaints with regards to fraud on priority and with seriousness without sharing the information with anyone else in the company. All such cases where the complaint on investigation is found to be correct will be brought to the notice of MD or any other designated person for necessary action.

27. REPROTING

Any Symbiotec Group of Companies Employee can choose to make a protected disclosure under the whistleblower policy of the company, providing for reporting to the Company Secretary or the Board of Directors or Specified authority. Such a protected disclosure shall be forwarded, when there is reasonable evidence to conclude that a violation is possible or has taken place, with a covering letter, which shall bear the identity of the whistleblower. The protected disclosure can also be forwarded by way of email to the Company Secretary of Symbiotec Group of Companies Email ID of the Company Secretary can be obtained from the HR Department.

28. BRIBERY

Symbiotec Group of Companies And its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business. SYMBIOTEC GROUP OF COMPANIES and its employees shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud and corruption.

However, SYMBIOTEC GROUP OF COMPANIES and its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given and / or are of commemorative nature. The acceptance of any gift, donation, commission or benefits shall be allowed only in accordance with point 12 above of this code.

29. ANTI COMPETITIVE PRACTICES

We at Symbiotec Group of Companies being a responsible corporate citizen shall not involve in any of the anticompetitive practices like:

- Non-competitive, secret, and sometimes illegal agreement between rivals which attempts to disrupt the market's equilibrium.
- Resale price maintenance where an agreement between a manufacturer and a wholesaler not to sell a product below a specified price.
- Exclusive distribution agreements where only one distributor is authorized to sell a specific product within a particular territory.
- An exclusive supply agreement meaning an agreement that restricts the purchaser from acquiring any goods or services from anyone other than the seller.
- Tied selling when a supplier, as a condition of supplying a particular product, requires or induces a customer to buy a second product. It may also occur when the supplier prevents the customer from using a second product with the supplied product.

30. ANTI-MONEY LAUNDERING PRACTICES

Money laundering is defined as directly or indirectly attempting, indulging or assisting in any process or activity connected with proceeds of a crime and protecting the same as untainted property and thereby helping it enter the stream of commerce. Money laundering may not be restricted to cash transactions and may also include monetary instruments and other proceeds of any illegal activity. Symbiotec Pharma Lab and its employees shall act diligently to prevent its products and services

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from being used to further Money Laundering of any nature whatsoever and detect any suspicious activity in this regard.

All Employees must be aware of Symbiotec Code of conduct, policies and procedures and must strive to adhere to following all requirement, at all times, including during their interactions with vendors/suppliers and others. Any such suspicious activity, including any potential suspected transactions arising even from discussions with them, must be immediately reported.

31. TERMINOLOGY

- employees refers to general employee
- personal information means any information about an identified or identifiable individual that is not available in the public domain
- Records management is the control and management of records to meet business, legal, fiscal and administrative requirements. It is a business imperative, a corporate responsibility and a critical function performed through the collective actions of individuals
- a record is recorded information in any form, be it Logbooks, Reports, Certificate including data in computer systems, created or received by any employees of the Company in the course of his/her duties.
- conflicts of interest are assessed in terms of the likelihood that employees possessing a particular interest could be influenced, or might appear to be influenced, in the performance of their duties
- public comment includes public speaking engagements, comments on radio and television; and expressing views in letters to the newspapers or in books, journals or notices, or where it might be expected that the publication or circulation of the comment will spread to the community at large; and
- Company refers to Symbiotec Group of Companies

32. AMENDMENTS

HR Department shall periodically review the Code to determine the revisions as may be required in line with the applicable laws. This code will be reviewed at least once every three (3) years in order to determine whether revisions may be required due to changes in the law or regulations, or changes in our business or the business environment, if revisions are required, same is implemented and duly inform to all the employees. Any other amendment/substitution/replacement in the Code should be recommended by HR to Company Secretary for necessary Board approval.

33. AWARENESS & TRAININGS

This Code and related training are provided to all new employees at the time of joining the Company. In addition, all employees shall affirm compliance with the Code by attending the mandatory trainings and their affirmation will be taken to reinforce the Code and ensure its Company-wide implementation.

HR Department will address any queries from employees pertaining to this Code. All employees are expected to keep themselves well-informed of the updates, if any, made to this Code.

All new and existing employees must sign an acknowledgement on a periodic basis, confirming that they have read the Code and agree to abide by its provisions. Failure to read the Code or sign the acknowledgement does not excuse an employee from compliance with the Code.

34. CONCLUSION

The company is committed to continuously reviewing and updating its policies and procedures. Therefore, the company reserves its right to amend, alter or terminate this code at any time and for any reason, subject to applicable law. This Code of Conduct is not exhaustive and lays down only the general principles to be followed by all the employees and other representative as covered under the code. The company may have separate codes/policies formulated for regulating various matters that may be required under the specific laws. The parties shall be responsible for adhering to such additional codes/policies as may be applicable to them.

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ADHERENCE OF CODE OF CONDUCT

It is expected that each employee will adhere to and promote the Symbiotec's Code of Conduct, in letter and spirit and will be committed to building up the image, reputation and business of the Company.

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STATEMENT

I have read and understood the above captioned Code of Conduct & Ethics.

By signing this statement, I declare that I acknowledge and agree to abide by this Symbiotec Group Of Companies Employee Code of Conduct.

(Signature)

(Print name)

(Insert date)

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

Authorised By


ANIL SATWANI
[Managing Director]
Date: 30.12.2025