

POLICY PROCEDURE MANUAL - CODE OF CONDUCT

1.0. Purpose

The Employee Code of Conduct outlines standards of personal and professional conduct that all employees must strive to uphold and behave in an ethical and professional manner 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 Polyols & Polymers Private Limited (herein after referred to as PPPL) and address any circumstances that may arise which conflict with the stated standards and values.

2.0. Policy Details

1.0. Managers/Supervisors responsibilities

Managers & Supervisors are responsible and accountable for:

- undertaking their duties and behaving in a manner that is consistent with 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 the Employee Code of Conduct by themselves or others.
- acting consistently and fairly in dealing with behaviour that breaches this code.

2.0. Employees responsibilities

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 by themselves or others.
- comply with PPPL policies and procedures.
- promote a positive, safe and healthy environment in the conduct of their work.
- To constantly learn and upgrade their competencies.

3.0. Attendance and punctuality:

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- undertaking their duties and behaving in a manner that is consistent with the provisions of the Employee Code of Conduct.
- 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 communicate with the manager (or appropriate delegate) promptly (preferably before their normal starting time) and indicate their likely return to work.
- managers may exercise their responsibility to contact employees who have not contacted them directly within a reasonable timeframe to ascertain the reasons for that individual's absence. Please refer to the "PPPL Leave and Holiday policy".

4.0. Dress and Appearance

Employees must at all times ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is always expected. Where a uniform is provided, it must be worn in accordance with PPPL requirements. Employees are expected to conduct themselves in a responsible and professional manner. The manager is responsible for determining the dress code appropriate to the environment while the manager can make exceptions for medical purposes. Employees must refer to the more detailed "PPPL Business attire and dress code policy".

5.0. Personal behaviour

Employees are required to undertake their duties in a professional, responsible, and ethical manner and to act in the best interests of PPPL. They are expected to act honestly in all their duties when dealing with clients, suppliers, contractors and fellow employees.

6.0. Natural justice, fairness and equity

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

7.0. Use of facilities and equipment

Employees should take all possible care when using PPPL property, goods, intellectual property and services and ensure they are used efficiently, carefully and honestly. Unless permission has been granted by the employees' manager. At any point, PPPL resources are not to be used for private purposes.

8.0. Privacy and use of personal and official information

Employees have an obligation to ensure that professional information is secured against loss, misuse or unauthorised access, modification or disclosure. Employees have a duty to maintain the confidentiality, integrity and security of official information for which they are responsible.

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9.0. Maintaining confidentiality of employment terms

An individual's salary is a confidential matter and something between the organisation and the employee. Comparing and discussing salary of other employees is strictly prohibited.

10.0. 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. All employees must therefore ensure that PPPL documents are not placed in unofficial or private filing systems but place such documents in official files. Employees must not remove documents from official files. They 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 PPPL Management.

11.0. Information Technology

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. All measures of Cyber security are to be followed.

12.0. Conflict of interest

If an employee becomes aware of the potential for conflict of interest then they must notify their manager of the potential or actual conflict of interest. PPPL expects employees to declare any likely conflict of interest to supervisors; and avoid any detrimental outcome as a result of a conflict of interest.

If a conflict of interest arises where a employee engages or is likely to engage in activities or is likely to advance personal or other interests at the expense of PPPL interests or the interests of other employees, PPPL may then intervene.

Employees must ensure that there is no conflict or incompatibility between their personal interests, whether pecuniary (e.g. money) or non-pecuniary and the impartial fulfilment of their duties. It is not possible to define all potential areas of conflict of interest, but a few examples are referred to below.

- gifts and hospitality offered where there is an expectation of a return favour.
- additional employment or business that prevents or hinders the performance of a person in their role.

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- promotion of or soliciting for clients for own private business

If an employee is in doubt as to whether a conflict exists, they must contact their manager or the employee must immediately disclose this to the PPPL Management.

13.0. Financial interests

Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or PPPL's 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 PPPL 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 PPPL activities or interests for personal gain.

14.0. Acceptance of commissions, gifts or benefits

Employees should not accept a gift, secret commission or a benefit from a person or organisation outside PPPL 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 PPPL to the detriment of PPPL's 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 PPPL Management, provided that there is no possibility that the employee might be perceived to be, compromised in the process. Gifts of a nominal value generally used for promotional purposes, 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.

15.0. Influence to secure advantage.

No employee shall elicit the improper influence or interest of any person to obtain promotion, transfer or other advantage.

16.0. Use of official information

While employees can contribute to public debate on social issues there are some circumstances in which public comment is inappropriate. Public comment by employees should not imply that the comment, although made in a private capacity, is in some way an official comment by PPPL. Employee may only disclose official information, with due regard to confidentiality, in order that it is in their official capacity and duties.

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An employee can disclose confidential or restricted information or documents acquired in the course of their employment only when required to do so by law, in the course of their duty, when called to give evidence in court, or when proper authority has been given. Approval to release confidential information on employees should be sought from the PPPL Management.

17.0. Employee-client boundaries

The term 'employee- client boundaries' identifies the importance of the trust inherent in the relationship between employees and their clients. Employees are expected to maintain proper boundaries with clients.

18.0. 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.

19.0. Personal and professional behaviour

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 comply with legislative and industrial obligations and administrative policies, fulfil their Health , Safety & Environmental obligations. They should 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 with courtesy and provide all necessary and appropriate assistance. They should not take or seek to take improper advantage of any official information gained in the employment with PPPL. They should 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. They should act responsibly when becoming aware of any unethical behaviour or wrong doing by any employee and any such information should be forwarded to the Management without any delay.

20. Alcohol, Smoking and substance abuse or misuse

Employees must ensure their safety and health. PPPL expects employees to perform their jobs with skill 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/or 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 strictly prohibited. PPPL premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces. Any such activity will be

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immediately referred to the police and PPPL 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. Smoking is not permitted in the PPPL premises.

21.0. Policies

Employees are responsible to carry out and comply with PPPL policies and procedures and legislation. By accepting employment with PPPL and employee agrees to be governed by PPPL policies and procedures, standing order and SOP etc along with the changes made to them. It is acknowledged that employee views, on particular matters, may differ from those of PPPL, however such views must neither interfere with the performance of an employee's duty nor prevent the employee from supporting PPPL objectives.

22.0. Compliance with lawful instructions

Employees must comply with any lawful instruction given by any person having authority to make or give such an instruction.

23.0. Bullying

Bullying is unacceptable conduct within PPPL and all reported incidents will be investigated. Bullying is unreasonable behaviour that is directed against an individual or group by another individual or group and is derived from the misuse of power over the target of the behaviour. This may include verbal abuse, shouting; excluding or isolating behaviour; deliberately withholding information vital for effective work performance; giving employees impossible assignments or physical abuse. It is the responsibility of all employees of PPPL to ensure that premises and facilities are free from harassment. Managers who become aware of serious breaches of policy must immediately notify their manager or the PPPL Management

24.0. Discrimination and Equal Opportunity

PPPL respects diversity. Treating people differently on the basis of personal characteristics is not acceptable. The following are examples of attributes: age, industrial activity, parental status, political belief, personal association, race, ethnic background, career status, marital status, pregnancy/potential, impairment, religious belief/activity, physical features, and disability. Discrimination is unacceptable conduct at PPPL, and all reported incidents will be investigated.

25.0. Harassment

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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. It constitutes a form of bullying. It does not have to be a series of incidents or an ongoing pattern of behaviour. Any such act will 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 advances, stalking and harassing phone calls or texts, some of which are also against criminal law, which means the police may prosecute anyone who commits such acts. Note that Fair discipline, performance counselling or workplace control practices based only on performance issues do not, in themselves, constitute harassment.

26.0. Racial and religious vilification

Racial and religious vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity. Racial and religious vilification is a form of harassment and discrimination and is unacceptable conduct at PPPL. All reported incidents will be investigated.

27.0. Health & Occupational safety

PPPL is committed to providing a safe and healthy workplace to all employees. However, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far is reasonably practical. 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 obtain the necessary information. All employees are responsible for knowing and complying with the HSE rules and guidelines ; working so as not to endanger themselves or any other person by any act or omission ; use and follow HSE instructions, training or other information and report all incidents, accidents, injuries and hazards to management for action.

28.0. Professional development

Employees must continually strive to improve their professional competence, maintain their knowledge and encourage the development of their skills and competence of associates.

29.0. External employment

PPPL restrains employees from working outside business hours as it may undermine or compromise PPPL interests. Employees should not engage in such employment, as it places them in conflict with their official duties, or would lead to the perception that they have placed themselves in conflict with their duties; it is likely to affect their efficiency in the performance of their duties; or it involves the use of PPPL resources for private purpose without authorisation or recompense.

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Subject to current policies, employees may not accept outside payment for activities, which would be regarded as part of their normal work activities.

30.0. Ownership of products and copyright

All products, literary, graphic, 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 PPPL and will not be used by the employee other than for the purpose of PPPL business. Unless otherwise agreed, PPPL retains the copyright of work produced by you during your employment with PPPL. Upon separation from 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.

31.0. Public conduct and media contact

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

32.0. Misuse

Employees must not deliberately misuse PPPL equipment, assets, or the services of other PPPL personnel. When using PPPL 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 data regardless of whether or not the programs are protected by copyright ; use of PPPL letterhead paper or postage when corresponding on personal or other matters not directly related to PPPL ; unauthorised use of PPPL logos ; falsifying, manipulating or destroying business records without specific authorisation ; using PPPL equipment for personal commercial gain Employees provided with vehicles (private or commuter use) are expected to use them in accordance with PPPL policy and guidelines only for approved official purpose.

33.0. Confidentiality

Employees may have access to personal or commercial information relating to individuals, the public, or the financial or other operations of PPPL. This information is to be used for PPPL purposes only and should remain secure and confidential. It is important that the community has confidence that information acquired by PPPL 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 PPPL, any confidential or sensitive information relating to PPPL and/or its operations.

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34.0. General

Employees will be bound by the rules and regulations as declared by the Management hereafter, from time to time. Employees will be covered by the service rules and regulations including the company code of conduct, discipline and administrative orders and any such rules, policies or orders of the company that may come in force from time to time.

35.0. Grievance handling

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. Investigations will be carried out with sensitivity and fairness and maintain confidentiality. 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 can be applied involving the management.

36. Email

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.

37.0. Breaches of the Code

PPPL is committed to the standards set out in the Employee Code of Conduct. Where a breach of the Code has been identified by PPPL a response to the breach may result in either or combination of : counselling ; disciplinary action ; suspension; laying of criminal charges or civil action and/or even termination of employment. All rights for action in this case is reserved with the management.

3.0. Policy Scope

This policy is applicable to all the employees of PPPL including Trainees. Employees are individuals who have been issued an appointment letter from PPPL and/or who receive salary from PPPL.

4.0. Policy Owner

Human Resource Department & Management.

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