

### **Swastik Code of Conduct for Senior Management**

1. To act in accordance with the highest standard of personal and professional integrity, honesty and ethical conduct in the discharge of duties.
2. To observe and help the Company in maintaining highest degree of Corporate Governance.
3. To use reasonable care and skill in the discharge of duties and responsibilities and exercise of powers for the benefit and prosperity of the Company.
4. To have a clear understanding of the aims and objectives, capabilities and capacity and various policies of the Company.
5. To devote full attention to the business interests of the Company.
6. To comply with all applicable laws and regulations, both in letter and in spirit , in all territories in which he/she operates.
7. To avoid and disclose actual and apparent conflicts of personal interest with the interest of the Company and to disclose all contractual interest, whether directly or indirectly, with the Company.
8. To act in accordance with the highest moral and ethical standards while dealing with the Company's women employees and to avoid all actions or inactions leading to any kind of sexual harassment.
9. To treat women employees equally and eliminate any gender discrimination.
10. Not to engage in any activity that interferes with the performance or responsibilities to the Company.
11. Not to accept simultaneous employment/directorship with the suppliers, customers or competitors of the Company and not to take part in any activity that enhances or supports a competitor.
12. Not to accept employment or a position of responsibility (such as a consultant or director) with any other company or firm, nor provide 'freelance' services to anyone.
13. Not to make investment in any customer, supplier or competitor of the Company that may compromise on his/her responsibilities to the Company and any such investment shall be with full disclosure to the Company.

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