

CODE OF CONDUCT FOR DIRECTORS AND SENIOR MANAGEMENT

Oriental Trimex Limited

1. Preamble

Oriental Trimex Limited is committed to conducting its business with the highest standards of integrity, transparency, ethics and accountability.

This Code of Conduct (“Code”) lays down the principles and standards applicable to the **Directors and Senior Management** of the Company.

2. Applicability

This Code shall apply to:

- All Directors (Executive, Non-Executive and Independent)
 - Key Managerial Personnel (KMPs)
 - Senior Management Personnel
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3. Core Values

Directors and Senior Management shall uphold the following values:

- Integrity and honesty
 - Transparency and accountability
 - Fairness and respect
 - Compliance with laws
 - Commitment to stakeholders
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4. Ethical Conduct

- Act honestly, ethically and in good faith
- Avoid any conduct that may harm the reputation of the Company
- Ensure decisions are taken in the best interest of the Company and its stakeholders



5. Compliance with Laws

- Comply with all applicable laws, rules and regulations
- Ensure adherence to the Companies Act, SEBI Regulations and other statutory requirements
- Any violation of law shall be promptly reported

6. Conflict of Interest

- Avoid situations involving actual or potential conflict of interest
- Disclose any conflict of interest to the Board promptly
- Abstain from decision-making where a conflict exists

7. Insider Trading

- Comply with the Company's **Insider Trading Code**
- Do not use unpublished price sensitive information (UPSI) for personal gain
- Maintain confidentiality of sensitive information

8. Confidentiality

- Maintain confidentiality of all non-public information
- Use Company information only for legitimate business purposes
- Continue confidentiality obligations even after cessation of association

9. Fair Dealing

- Deal fairly with:
 - Employees
 - Customers
 - Vendors
 - Shareholders
 - Government authorities
- Avoid unfair or deceptive practices

10. Protection of Company Assets



- Safeguard Company assets and resources
- Prevent misuse, theft or unauthorized use
- Ensure assets are used only for legitimate business purposes

11. Workplace Conduct

- Promote a respectful, inclusive and safe work environment
- Prohibit discrimination, harassment or abusive conduct
- Comply with POSH Policy and workplace safety norms

12. Environment, Health & Safety

- Support environmentally responsible practices
- Ensure compliance with safety, health and environmental laws
- Encourage sustainable manufacturing practices

13. Reporting of Unethical Behaviour

- Promptly report any unethical behaviour, violation of this Code or illegal activity
- Use the **Whistle Blower / Vigil Mechanism** for reporting
- Protection against retaliation shall be ensured

14. Accountability & Disciplinary Action

- Violation of this Code may result in:
 - Disciplinary action
 - Removal from office
 - Legal proceedings, where applicable

15. Acknowledgement & Compliance

- Directors and Senior Management shall affirm compliance with this Code annually
- Any deviation shall be disclosed to the Board

16. Policy Review & Amendment



- This Code shall be reviewed periodically by the Board
- Amendments shall be made in accordance with changes in law or governance standards
- Statutory provisions shall prevail in case of conflict

For Oriental Trimex Limited

