



Code of Business Conduct & Ethics	Document No.	HR- WP- 09
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“Our Code of Business Conduct & Ethics is Definitive; it is not Negotiable”

Objective:

We have a **Code of Business Conduct & Ethics** to show us how to make sound decisions and to demonstrate proper actions for conducting business at Oriental Rubber. Our Code fosters a shared understanding of what achieving the right results; the right way means. By knowing and following our Code, each of us does our part to maintain and further build trust with our various stakeholders -including **our colleagues, customers, business partners, shareholders, and communities.**

Eligibility:

Our Code applies to all **employees and stakeholders**, our businesses, and affiliates. We expect, when working on our behalf, all our **suppliers, business partners, agents and authorities** will uphold the Code of Conduct.

Guidelines:

What do I need to Follow?

We are all expected to know our Code of conduct and other company policies, procedures and guidelines that apply to our work, as well as all applicable laws and regulations - regardless of where we operate. We must never ignore or try

to work around the Code for any reason, even meeting business goals. If you need help understanding our Code or a particular policy, procedure, or guideline, please contact the HR department.

What laws do I need to follow?

While our Code cannot cover the specific language of every law that applies to our business, you and every stakeholder representing us must know, understand, and follow the laws and regulations that govern the work you do on the company's behalf. Please contact HR department before proceeding, if after reviewing our Code and any applicable policies, you have questions about the rules that apply to your work.

1. Respect for Company Values and Human Rights

1.1 Our core values express what we expect of ourselves and each other and they serve as a foundation for our decision making and therefore, you are required to live and work by the **Company's Values**.

1.2 You must work for **Right to Equality** and be **fair in your dealings** with all stakeholders including employees, contractors, vendors, customers etc.

1.3 You shall ensure that all stake holders have the **Right to Freedom**, and not propagate bonded labour, forced / coerced work conditions.

1.4 You shall ensure that there is no exploitation and that all employees have the **Right against Exploitation**.

1.5 You shall allow all stake holders the **Freedom of Religion**, and that all stake holders have their **Cultural and Educational Rights**. – to be replaced by “While you are allowed to have the Freedom of Religion, you shall ensure that your religious practices shall not disrupt work or cause any discrimination”

1.6 You shall ensure that all concerned have the **Right to Constitutional Remedies**.

2. Our responsibility for Compliance:

The Code of Conduct serves as a binding guideline in our day-to-day business. It is supplemented by internal guidelines, policies, and employment contracts. We **comply with state, national, and international statutory provisions**. This also means that we never take any part in any activity that involves fraud, misappropriation, extortion, theft, embezzlement, or any other deliberate damage to our assets or those of our customers or any third party.

2.1 We have a strong **“Speak Up”** culture, which helps us handle issues and address problems promptly, building trust with one another and with our customers, suppliers and business partners and protecting the company from legal, financial, and reputational risks.

2.2 You are **encouraged to voice concerns** or ask questions through multiple channels, including talking with your reporting Manager, peers, and HR.

2.3 Failure to comply with this Code or company guidance documents may result in disciplinary action or termination.

2.4 Discipline decisions can vary depending on the severity of misconduct and your disciplinary record, years of service, and duties. A reference to the Discipline Policy could also be made.

3. Our responsibility as a Business Partner



3.1 Conflict of interests

- 3.1.1 You are expected to adhere to the highest order of **ethical standards while dealing with all stake holders including, customers, suppliers, governmental entities**, and other employees.
- 3.1.2 You shall not **engage in any business, relationship or activity** which might **detrimentally conflict** with the interest of the company.
- 3.1.3 If your **personal interests clash** or could clash with the interests of the Company, such a conflict of interest could damage the Company and therefore shall be avoided.
- 3.1.4 You shall not **discuss your investments with other people** during office hours which may distract them from their work.
- 3.1.5 In the event **any member of your immediate family or extended family is getting employment in any plant / office of Oriental Rubber** the same shall be declared immediately. **You shall fill in the Declaration Form that shall be provided by the HR department.**

3.2 External and Dual employment

- 3.2.1 **Dual employment is strictly prohibited.** You are expected to devote your full time and effort to the Company and are not allowed to undertake other activities, whether you receive financial compensation for these or not.
- 3.2.2 In case if you wish to undertake any such other activity after duty hours, then you shall seek **Management's written approval** prior to indulging in such other activity
- 3.2.3 You are **not encouraged** to take up **Board Membership** of any other company while in service; however, if you desire to do so you shall keep HR informed.



3.2.4 You shall not indulge in practices of **opening firms in your spouse's or any other immediate relatives'** name and doing business with Oriental Rubber.

3.3 Gifts, hospitality, and invitations.

3.3.1 Benefits in the form of gifts, hospitality and invitations are prevalent in business relationships. These benefits are not a cause for concern if they are within reason and do not contravene any internal or statutory rules and are not more than **Rs. 1500/- per occasion**.

3.3.2 If you are **unsure of the value of the gift**, you can submit the gift to the **HOD** who may decide to pool all the gifts and distribute amongst all employees.

3.3.3 We appreciate that the practice of giving gifts varies between countries and regions and what may be acceptable in one may not be acceptable in another. All times **the intention of the gift** shall be considered.

3.3.4 You must ensure that all expense claims related to gifts, invitations and expenses incurred to third parties are submitted in accordance with Company's policies and specifically record the reason for expenditure.

3.4 Anti-bribery and Anti-Corruption (dealings with suppliers, officials, and holders of political office and any other parties)



- 3.4.1 Our contacts with officials and holders of political office shall be strictly in line with all the laws and legislation as well as the internal rules concerning the avoidance of conflict of interest and corruption.
- 3.4.2 In many jurisdictions, **making Facilitation Payments is illegal**. We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind anywhere in the world.
- 3.4.3 Where the **facilitation payment is being extorted / forced to pay**, then pay the Facilitation Payment and immediately **report to your Manager** and HR.
- 3.4.4 It is not acceptable **to threaten or retaliate against any other employee** who has refused to commit a bribery offence or has raised concerns.
- 3.4.5 You shall **prevent and report** any form of bribery and corruption and must report to your HOD & HR as soon as possible if you are offered a bribe, or asked to make one, suspect that this may happen in future or believe that you are a victim of a form of unlawful activity.

3.5 Accounting and financial reporting

- 3.5.1 We strictly comply with statutory provisions for proper accounting and financial reporting.
- 3.5.2 We publish our **periodic financial statements punctually** in accordance with **national and international accounting regulations**.
- 3.5.3 You shall ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with third parties are prepared and maintained with strict accuracy and completeness. **No accounts shall be kept "off-book"**.



4. Our responsibility at workplace and towards society

4.1 Equal opportunity and equal treatment

4.1.1 We offer **equal opportunities** and do not discriminate on grounds of ethnic or national origin, sex, religion, views, age, disability, sexual orientation, skin colour, political views, social background, or any other characteristics protected by law.

4.1.2 We **embrace diversity**, actively encourage inclusion, and **create an environment that fosters each employee's individuality**.

4.2 Harassment

4.2.1 We are committed to maintaining a work environment that **respects individual differences**.

4.2.2 You shall treat others with respect, fairness, and dignity. No forms of harassment or discrimination are tolerated, regardless of the employee's willingness to participate; such conduct can result in termination.

4.2.3 Harassment or discrimination can include:

- i. **Comments, jokes, slurs, email messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment.** This includes carrying out the above using personal electronic devices on company time or in company work environments.
- ii. **Bullying, initiation activities, or workplace hazing**, which can be humiliating, degrading, or cause emotional or physical harm.
- iii. **Verbal, visual or physical.** It may be non-sexual or sexual in nature.



4.3 Workplace Violence

4.3.1 We are committed to maintaining a safe and secure workplace. **Acts or threats of physical violence, intimidation, coercion, stalking, sabotage, disrespectful language, and similar activities are not tolerated.** Employees who engage in such acts or threats of violence may face strict disciplinary action including termination. A reference to the Discipline Policy could also be made.

4.3.2 You shall also avoid spreading any rumours on any subject, which could be detrimental to the working of the Company.

4.4 Security of information

4.4.1 It is necessary to **thoroughly protect and manage various types of information** as prescribed by the IT Policy.

4.4.2 **Technical secrets and trade secrets** (development plans, drawings, specifications, manufacturing methods, product plans, financial data, prices, computer programs, and any other confidential information, such as files, e-mails, and photographs) are valuable and you need to take precautionary measures to prevent unauthorized access, loss, destruction, and leakage of such information.

4.4.3 When disclosing technical secrets and trade secrets to third parties, you shall confirm that a **nondisclosure agreement** has been entered into with the third party **and their authorized signatory**, and do not disclose such information for improper purposes.

4.4.4 You shall not use any of **these materials after retirement** as all these are Company property.

4.4.5 You are required to maintain, both, during employment and **after severance of employment with the Company**, confidentiality of any

confidential information, records or other materials acquired during employment.

4.4.6 You shall not **misrepresent your own information** to people outside the company (e.g. If your designation is an Assistant Manager, you shall not communicate to others that you are a Manager).

4.4.7 You shall also **not include any proprietary information** in your biodata.

4.4.8 **While in public places you shall refrain from discussing any proprietary information or from taking names of customers / suppliers etc.**

4.5 Close Personal Relationships

4.5.1 You shall take **personal responsibility for your relationships** and shall not engage in personal relationships that disrupt or negatively impact the workplace. Even if a relationship does not violate our conflict of interest, charges of sexual harassment or other inappropriate conduct may develop.

4.5.2 To avoid these problems and to foster a positive team environment, **you must promptly report to your HR any close personal relationships** that results or could result, in a conflict of interest. After reviewing the facts, the Company will take appropriate action.

4.6 Use of technology

4.6.1 Corporate email

4.6.1.1 You shall use **your company email id primarily for work:**

4.6.1.2 You can use your corporate email for work-related purposes without limitations. For E.g., you can sign up for newsletters and online services that will help you in your job or professional growth.

4.6.2 Our general expectations

4.6.2.1 No matter how you use your corporate email, **we expect you to avoid:**

- **Signing up for illegal, unreliable, or suspect websites and services.**
- **Sending unauthorized marketing content or emails.**
- **Registering for a competitor's services, unless authorized.**
- **Sending insulting or discriminatory messages and content.**
- **Spamming other people's emails, including your coworkers.**

4.6.2.2 In general, **use strong passwords and be vigilant** in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our IT team.

4.6.3 Internet usage

4.6.3.1 You must not use internet connection to:

- **Download or upload obscene, offensive, or illegal material.**
- **Invade another person's privacy** and gain access to sensitive information.
- **Download or upload pirated movies, music, material, or software.**
- Visit potentially dangerous websites that can compromise our network and computers' / laptops' safety.
- **Perform unauthorized or illegal actions**, like hacking, fraud or buying / selling illegal goods.
- **You shall not speak to media / social media / public forums** without the written permission from the Company.
- **You shall use the Company Logo for only those purposes for which the use of Logo has been approved. The Company Logo shall not be misused in any way.**



4.6.4 Cell phone

We allow use of cell phones at work. However, we want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a few simple rules:

- **Use your cell phone in a manner that benefits your work** (business calls, productivity apps, calendars.)
- **Keep personal calls brief** and preferably use an empty meeting room or common area so as not to disturb your colleagues.
- **Avoid playing games** on your phone or texting excessively.
- **Don't use your phone** for any reason **while driving**.
- **Don't use your phone to record confidential information.**
- **Don't download or upload inappropriate, illegal, or obscene material** using Company internet.

5. Safety Principles

5.1 We must create an atmosphere **where employees feel free to raise all safety-related issues** without peer pressure or fear of reprisal. This also includes **near miss and unsafe conditions** of any kind.

5.2 We must encourage **open and honest communication on safety** so that we identify and eliminate unsafe situations and avoid incidents and injuries. You shall report to HR of any unsafe occurrences and hazardous circumstances.



5.3 You shall maintain **acceptable noise level at the workplace** and necessary decorum.

5.4 You shall ensure that your actions for carrying out company operations do **not adversely impact long term health of Individuals.**

5.5 When operating in areas where contagious diseases are endemic, **you shall provide appropriate information and training to mitigate risk.**

5.6 Also, through HR you shall Provide medical facilities / assistance / insurance as required by the Factory's Act / Local Statute etc.

6. Use of company assets

6.1 You shall **protect Company assets** (tangible and intangible) and ensure their efficient use. **Theft, carelessness, and waste** have a direct impact on the Company's profitability and therefore any suspected incident of fraud or theft should be immediately reported to HR for investigation.

6.2 You must avoid **unauthorized use of copyrighted materials of others** and should consult with your reporting Manager if you have any questions regarding the permissibility of photocopying, excerpting, electronically copying or otherwise using copyrighted materials.

6.3 **You must return all property immediately upon separation.** The company may withhold your final settlement to recover dues, if any, and take all necessary action to recover or protect its property.

7. Drugs and Alcohol

7.1 You are expected to perform your work in a **safe manner, free of the influences of alcohol, illegal drugs, or controlled substances.**

7.2 **Drunkenness, intoxication, or disorderly conduct** relating to drugs and/or alcohol within the Company premises and corporate functions (including



events that involve client or employee entertainment), possession or use of illegal drugs off premises and off duty is also prohibited.

7.3 To the extent that the presence of such drugs or their metabolites are **detected your blood or urine**, or by any other means, you will be in violation of Code of Conduct, and **strict disciplinary action may be taken**.

7.4 **Our plants have a Zero tolerance Policy on smoking in the premises and you shall ensure that you respect the same. Within Offices you are permitted to smoke only in designated areas.**

8. Commitment to environment

8.1 **We focus on environmentally friendly, advanced, and efficient technologies**, which we implement throughout the entire lifecycle of our products.

8.2 Starting with the **early phases of development and production**, we make sure we manage natural resources carefully and steadily reduce the environmental impact to comply with environmental protection laws and regulations.

8.3 **We shall also ensure that all our wastes are disposed of through authorized vendors in accordance with the statute.**

9. Commitment to our customers

9.1 We take responsibility for **preventing, to the extent possible, any risks, detrimental effects and hazards to the health, safety, environment, and assets of our customers** or any third party arising from the handling and use of these products and services.



9.2 It is not only our statutory duty but also **our mission to comply** with the laws and regulations as well as the internal standards that apply to our products.

10. Non-involvement in human right abuses related to Child Labour

10.1 **We will not engage in and promote child labour.**

10.2 We shall make **our contractors, suppliers, and our affiliates strongly aware of this guideline.**

10.3 We shall ask for **an undertaking on non-involvement in child labour from our suppliers / contractors.** If in doubt and as required, the Company will monitor their employment practices through surveys, site visits and audits.

11. Adherence to the Policy:

11.1 Report a code of conduct violation: You shall report to your HOD & HR regarding any violation of the Code of Conduct that you may observe.

11.2 You may personally speak to them and / or also email your observations to the email id: coc@orientalrubber.com

11.3 The Code of Conduct Committee shall ensure that they communicate to you regarding their findings of your concerns within 7 days of your reporting.

11.4 Names of members of the Committee shall be displayed at all notice boards.

11.5 Please be assured that the information provided by you shall be kept entirely confidential.

11.6 HR department shall conduct awareness programs for all employees and affected parties periodically

11.7 During recruitment the recruiting team shall be specifically sensitive of the possibilities of violation in the code of conduct (especially if an incumbent is willing to share confidential and sensitive information of his current employer).

11.8 All existing employees shall acknowledge in writing the understanding and adherence of this policy.

12 Amendment:

12.1 The company reserves its rights to amend or to modify this code of conduct in whole or in part at any time without assigning any reason whatsoever.

12.2 The code of conduct document shall be reviewed at least every 2 years to determine whether revisions may be required due to changes in regulation or changes in business environment.

12.3 The company shall inform employees regarding of amendment / modification carried out of this Code of conduct and employee shall be bound to the modifications.

Approved By



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