

# **FIBRE FOILS LTD.**

## **CODE OF CONDUCT & CONFLICT OF INTEREST POLICY**

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**At Fibre Foils Ltd., we are committed to:**

- A standard of excellence with integrity in every aspect of our business;
- Focus on sustainable Eco-friendly paper packaging solutions with innovation and diversification.
- Ethical and responsible conduct in all of our operations;
- Respect for the rights of all individuals; and
- Respect for the environment.

### **CODE OF CONDUCT POLICY**

**This policy is based on industry accepted labor standards and guiding Principles for Business, Human and Environment Rights. This Code also includes Company's human rights and Environment Policy.**

**We are committed to meet the following standards:**

#### **Child Labor**

We will not employ child labor.

The term "child" refers to a person younger than the legal age prescribed by the Local State Government for employment. Employing young persons who do not fall within the definition of "children" will also comply with any laws and regulations applicable to such persons.

#### **Involuntary Labor**

We will not use any forced or involuntary labor, whether prison, bonded, indentured or otherwise, or engage in Human Trafficking or any form of slavery.

#### **Coercion and Harassment**

We will treat each employee with dignity and respect and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse. Sexual or any other kind of harassment is not acceptable.

#### **Nondiscrimination**

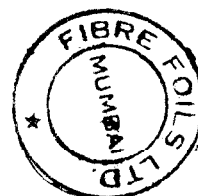
We will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, pregnancy, political opinion or disability. We will be an equal opportunity employer.

#### **Association**

We will respect the rights of employees to associate, organize, and bargain collectively in a lawful and peaceful manner, without penalty or interference.

#### **Health and Safety**

We will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring, at a minimum, reasonable access to potable water and sanitary facilities; fire safety; and adequate lighting and ventilation. We will also provide reasonable safety precaution to protect women employees.



## **Compensation**

We recognize that wages are essential to meeting employees' basic needs. We will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.

## **Hours of Work**

Except in extraordinary business circumstances, we will not require employees to work overtime hours than the regular working hours allowed by the law and as per relevant industry standards.

Except in extraordinary business circumstances, employees will be entitled to at least one day off in every seven-day period. We will compensate employees for overtime hours as per the legally prescribed rate.

## **Protection of the Environment**

We will comply with all applicable environmental laws and regulations.

## **Other Laws**

We will comply with all applicable laws and regulations, including those pertaining to the manufacture, pricing, sale and distribution. All references to "applicable laws and regulations" in this Code of Conduct include local and national codes, rules and regulations and voluntary industry standards.

## **Publication**

We will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees.

## **Ethical Standards**

In our Organization Bribes, kickbacks or similar unlawful or improper payments, in cash or kind, are strictly prohibited, whether given to obtain or retain business or for any other purpose.

## **Environment**

We are committed towards helping our customers 'GO Green' by providing them with durable, eco-friendly solutions to their packaging needs. We only use completely biodegradable materials. We take pride in knowing that our products not only do the job they were designed for but also contribute towards saving the environment.

## **Human Rights Policy**

We are committed to respecting and promoting the recognized human rights principles throughout the Organization. We have a long-standing commitment to ethical and responsible conduct in all our operations, to improve the quality of life in the communities we serve, and to respect the human rights of all people.

We treat our employees with respect and dignity and we share that responsibility individually and collectively. We have implemented this policy as our commitment through the Company's Code of Conduct and Ethics.

## **CONFLICT OF INTEREST POLICY FOR EMPLOYEES**



**This Policy establishes guidelines governing conflict of interest matters related to employees, to avoid compliance risk and misconduct.**

**This policy guides us to act in the interest of the company and avoid situations that could exploit our professional status for personal benefits. Our employees shall always act in the interest of the company. They should ensure that any business or personal association which they may have, does not create a conflict of interest, with their roles and duties in the company or its operations.**

**Conflict of Interest:** A conflict of interest could be any transaction, relationship or service engaged by an employee or a person with whom he / she has close personal relations including his / her immediate family / relatives, which may cause concern (based upon an objective determination) that the employee could not or might not be able to fairly perform his / her duties to the company.

### **Clauses of Conflict of interest**

**An employee must avoid conflicts of interest by always acting in the best interest of Company. This means that, employees:**

- Must avoid situations in which personal or financial interests' conflict with those of the Company.
- Must not pursue interests of their own within the context of doing their jobs that conflict with the interests of the Company.
- Must not directly or indirectly exploit any business opportunity available to the Company for their own benefit or the benefit of persons or Companies outside of the Company.
- Must avoid any kind of engagement in any business, relationship or activity with anyone who is party to a transaction with this Company.
- Must avoid being in a position to derive an improper benefit, personally or to any of his relatives, by making or influencing decisions relating to any transaction.

### **Conflict of interest includes situations:**

- Where an employee's private affairs or financial interests are in conflict with his / her work duties, responsibilities and obligations, or results in a perception that a conflict exists.
- That could impair the employee's ability to act in the Company's interest.
- Where the actions of an employee would compromise or undermine the trust of stakeholders.

### **A conflict of interest, actual or potential, arises directly or indirectly where an employee:**

- a) proposes to engage in a personal business transaction or a personal relationship with the business associates of our Company;
- b) is offered / derives undue benefit, personally or for, any person with whom he / she has close personal relationship, by making or influencing decisions relating to any transaction;
- c) is in a position to influence a decision with regard to the company's business with a business associate where person with whom he / she has close personal relationship is a proprietor / director / partner or representative;



d) is in a position to influence decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a person with whom he/she has close personal relationship, employed in the company;

e) represents the Company in any transaction in which he or his immediate family member has an interest;

f) has accesses Company records or processes any transactions involving himself, his family member or friends, and / or co-workers in violation of Company's or Department policies;

g) receives a cash payment of any amount from a vendor, supplier, provider, customer, or competitor;

h) or a member of his immediate family has a material relationship or a significant financial interest with a customer, supplier, or competitor of Company. Immediate family includes spouse, parents, siblings, children.

### **Conflict of Interest Compliance**

All the employees of the Company have to strictly ensure that there is no conflict of interest in any manner whatsoever.

An employee of Company, shall not accept a position of responsibility in any other Company or non-profit Organization without specific written sanction from the Chairman of the Group.

In case there is any actual or potential conflicts of interest, the concerned employee must immediately communicate such conflicts in writing and seek approval thorough HR fficer.

The HR officer shall revert to the employee within a reasonable time, so as to enable the concerned employee to take necessary action as advised to resolve or avoid the conflict in an expeditious manner.

Employee must be fair and transparent in all of their dealings on behalf of the Company.

Employees are required to consult with the HR officer whenever they have any question as to whether a particular circumstance may place them in a conflict-of-interest situation.

Persons who fail to comply with this policy during the course of their engagement with the company will be subject to appropriate disciplinary action.

**Definition:** Employee manes All the on roll, off roll, contractual, retainer, permeant, temporary employees who get paid for their services rendered to the Company.

**Escalation:** Any queries, complaints or clarifications to be sent to HR Officer at [hrd@fibrefoils.com](mailto:hrd@fibrefoils.com)

**This policy is aligned with our values and aspiration to provide the Environment friendly paper packaging solutions to the World.**

Approved By: Mr. Diwakar S. Shetty (Chairman) /  Version: 3.0, Effective Date: 30-Sept-2024



Next Review Date: 30-Sept-2025 (1 Year)