



Stabicon

Incise Solution Decisive Result

CODE OF CONDUCT

Document Id: SLS/COC-01
Revision : 001



1.1 WE STRIVE TO HAVE SUCCESSFUL WORKING RELATIONSHIPS:

At Stabicon, we take pride in the strong personal commitment of our people and the excellent achievements that result from that commitment. However, this level of co-operation can only be achieved in a climate of trust, open and honest communication, and respect, all of our dealings with our peers, our subordinates and supervisors should be conducted as a partnership, where each individual's behavior is governed by an overriding commitment to ethical conduct and Stab icon's success.

Our relationship with those we work with should be as a member of a winning team. People working with harmony and focused on a set of mutual objectives driving momentum behind our business. For this dynamic team relationship to work each one of us must fulfill our responsibilities - and feel assured that others would do the same. This means providing necessary support to others, at every level, to get the job done. No individual can place its own priorities before those of the company.

Our relationship with those we work with or supervise should promote ethics and compliance by setting an example of decency, fairness and integrity in working with others. As leader, we are responsible for clearly defining standards of performance and creating an environment that promotes teamwork

1.2 WE PROMOTE OPEN AND HONEST COMMUNICATION:

We encourage creative and innovative thinking, and we expect that everyone including our subordinates is treated as individuals, providing them the freedom necessary to do their jobs. We encourage suggestions for performance improvement.

Our relationship with our supervisor should be one of mutual respect and trust. Our supervisor and we are a team with the shared purpose of achieving the goals set for the company. Each one of us is responsible for ensuring that the communication is open and honest. Take the initiative as often as you can. Be in solving problems. Your co-operation and creativity are essential to achieving the goals of your Company.

1.3 WE VALUE PEOPLE AS OUR GREATEST RESOURCE:

Stabicon's commitment to caring for people is manifested in the workplace, to promote and reward individual and team achievement. In the end, it is the efforts of our talented and skilled people that make the success of our business possible. Specifically, in matters of employment, it is our policy:

- ❖ To select, place and pay all Stabicon people based on qualification for the work to be performed and without discrimination based on race, religion, national origin,



CODE OF CONDUCT

ethnicity, color, gender, gender identity, age, citizenship, sexual orientation, veteran status, marital status, disability or any other characteristic protected by law.

- ❖ Not to use child labour. Child labor is defined as employing any person younger than the minimum age allowed by law in the jurisdiction in question; however, in no event will we knowingly employ anyone younger than Eighteen (18) years of age.
- ❖ To maintain an inclusive work environment and achieve excellence by attracting and retaining people of all backgrounds in our workplace.
- ❖ To provide training, education and promotional opportunities that permits development and career advancement for all Stabicon people.
- ❖ To conduct performance appraisals those provide candid and accurate feedback. To encourage two-way comments and discussion, and review of appraisals by higher levels of management.
- ❖ To pay for performance, recognize, and reward contribution by individuals and teams that exceeds their normal job duties.
- ❖ To prohibit sexual or any other kind of harassment of Stabicon people by any person in the workplace or while conducting Company business.
- ❖ To avoid favoritism or the appearance of favoritism in the workplace in accordance with the policies and procedures adopted by the Company.
- ❖ To respect an individual's privacy and to collect, process, use and retain employee's personal information only as necessary and in accordance with the laws of the Country.
- ❖ To strive to eliminate potential hazards from the workplace and provide a safe and healthy work environment for Stabicon people, and to strive to comply with all applicable occupational safety and health laws and standards.

To help maintain a safe, healthy and productive work environment, for all Stabicon people and others, by;

- ❖ Prohibiting the possession, use, sale or transfer of illegal drugs or drug paraphernalia on Company property or time.
- ❖ Prohibiting conducting Company business while under the influence of alcohol.

Prohibiting the possession or use of weapons/firearms or ammunition on Company premises or while conducting Stabicon business subject to local law. Possession of a weapon can be authorized for security personnel when this possession is determined necessary to secure the



safety and security of Company employees; and Reporting any instance of drug or alcohol abuse or weapons possession to management immediately.

- ❖ Any workplace conduct arising from a romantic relationship or friendship between employees may be improper if the conduct creates an uncomfortable work environment for others. Favoritism or making business decisions based on emotions, allegiances or friendships rather than the best interests of the Company is prohibited. Individuals who find themselves in a personal relationship or friendship should use tact, good judgment and sensitivity.
- ❖ Be conscious of the fact that another member of your household might be employed in a capacity that could create or appear to create a conflict of interest. If this situation arises, consult your manager.

1.4 WE AVOID CONFLICTS OF INTEREST:

Our judgment is one of our most valuable assets. We should avoid any activity or association that conflicts with or appears to conflict with our exercise of independent judgment in the Company's best interests. Conflicts can arise in many situations. It is impossible to cover them all here, and it will not always be easy to distinguish between proper and improper activity. When in doubt, consult your manager before taking any action. The following guidelines apply to the most common conflict situations:

1.5 INVESTMENTS :

Do not make any investment that might affect your business decisions. Company policy prohibits Stabicon people from owning stock or having a proprietary interest in a Company competing with or doing business with Stabicon.

FAMILY :

Notify your manager and obtain approval from him before doing business on Stabicon's behalf with any company in which you or a close family member has an interest such that you may in any way benefit from your or their actions.

1.6 OTHER WORK

Do not work for a competitor while working for Stabicon or do any work for, or assist any third party that may adversely affect your performance or judgment on the job. Do not use company time, facilities or materials for outside work that is not related to your job at Stabicon.

1.7 PERSONAL

While we recognize and respect the rights of Stabicon people to freely associate with those they encounter in the work environment, we must also use good judgment in ensuring that those relationship do not negatively impact job performance, ability to supervise others or the work environment.



1.8 BOARDS

Obtains approval from the management before agreeing to serve on a board of Directors or a similar body for an outside business or government agency. Your manager must approve serving on the board of Directors for a professional or work –related nonprofit organization in advance.

1.9 WE PROTECT COMPANY'S PROPRIETARY INFORMATION :

Stabicon's secrets, other proprietary information and much of its internal data are valuable assets. Protection of these assets, including maintaining their secrecy, plays a vital role in our continued growth and ability to complete. A trade secret is information used in connection with Stabicon's business that is not generally known or easily discovered, and for which efforts have been made to maintain its secrecy. However, other proprietary information, such as know-how, has to be protected as well.

Stabicon's trade secrets and other proprietary information may consist of any formula, design device or information that is used in our business and that gives Stabicon an opportunity to obtain an advantage over our competitors. Stabicon's trade secrets and other propriety information are not always of a technical nature. They can also include business research, new service plans, strategic Objectives, any unpublished financial or pricing information, employees, customer and vendor lists and information regarding customer requirement, Preference, business habits and plans. While not complete, this list suggests the wide variety of information that needs to be safeguarded. Trade secrets and other proprietary information need not be patentable but cannot be generally or publically known.

Your obligations with respect to Stabicon's trade secrets and other proprietary information are:

- ❖ Not to disclose this information to other Stabicon peoples except on a "need to know" or "need to use" basis.
- ❖ Not to disclose this information to person outside of Stabicon.
- ❖ Not to use this information for your own benefits or the benefit of person outside of Stabicon.
- ❖ If you leave Stabicon, your obligation to protect Stabicon's trade secrets and other proprietary information continues until the information becomes publically available or Stabicon no longer considers it a trade secret or proprietary. You should also remember that correspondence, printed matter, electronic information, documents or record of any kind, specific process knowledge, procedure, and special Stabicon ways of doing things.



- ❖ Whether confidential or not – are all the property of the company and must remain at Stabicon. Of course, personal skill acquired or improved on the job or the personal assets of the one who leaves. If you have questions as to whether information is proprietary or is a trade secret, you should contact management. Further details are available in the confidentiality agreement signed by each one of us.

1.10 WE ADHERE TO PRESS AND MEDIA REQUEST POLICIES.

Requests for financial or business information about Stabicon from the media, press, financial community or the public should be referred to the management. Request for information or other contacts from the regulators and authorities around the world must be referred to management. It is critical that no one respond to any such inquiry or contact themselves because any inappropriate or inaccurate response, even a denial or disclaimer of information, may result in adverse publicity and could otherwise seriously affect Company's legal position.

The policy does not apply to requests for publicly available information, such as Annual Reports, or promotional publicity activities of the Company.

For further information regarding Company's guidelines for maintaining confidential information, please refer to the confidentiality agreement signed by each one of us.

1.11 WE MAINTAIN RELIABLE RECORDS AND REPORTS.

The financial of our company and the result of its operation must be recorded in accordance with the requirements of law. Generally accepted accounting principles (GAAP). Company Policy, as well as the law, requires Stabicon to maintain books, records and accounts that accurately and fairly reflect the nature of the business transaction and the disposition of assets of the Company.

The integrity of the Company's accounting and financial records is based on the accuracy and completeness of the basic information supporting entries to the Company's books of accounts. Everyone involved in creating, processing and recording such information is held responsible for its integrity. Every accounting or financial entry should reflect exactly what is described by the supporting information. There must be no concealment of information from (or by) management, or from the Company's internal or independent auditors.

No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment. No false or misleading entries should be made in any books or records of the company for any reason, and no fund, asset or account of the Company may be established, acquired or maintains for any purpose unless such fund, asset or account is properly reflected in the books and records of the company. No corporate funds or assets should be used for any unlawful or improper purpose. Managers and others responsible for the preparation of financial information



should ensure that financial policies are followed. Revenue and expenses should be properly recognized on a timely basis.

Assets and liabilities should be properly recorded and appropriately valued. In addition, those who are responsible for or involved in filings required by applicable law or other communications with the business or financial community should ensure that those filings and communications contain disclosure that is full, fair, accurate, timely and understandable. If you become aware of a possible omission, falsification or inaccuracy in accounting or financial entries, in basic data supporting such entries, or in reports or other communications, or any breakdown in internal controls, you must promptly report such information to your manager.

1.12 WE PROTECT STABICON'S ASSETS.

Company assets, facilities or services must be used only for lawful, proper and authorized purposes. The theft of money, property or services is strictly prohibited. Stabicon equipment, systems, facilities, and supplies must be used only for conducting Stabicon business or for purposes authorized by management. You are personally responsible not only for protecting Stabicon property entrusted to you, but also for helping to protect Company's assets in general. You should be alert to any situations or incidents that could lead to the loss, misuse or theft of company property and you must report all such situations to your manager or the management as soon as they come to your attention.

Only certain officers and other senior employees have authority to make commitments affecting Company's assets. You should not make commitments affecting Company assets unless properly authorized. If you need to clarify your or another individual's authority to commit the Company, you should contact your manager.

We must use Stabicon's Information Technology Resources responsibly and in a manner consistent with the code and all other company guideline, including those related to specific computer technology, data protection, confidential and proprietary information, and intellectual property rights. Stabicon's Information Technology Resources include all computer equipment that is owned, leased or rented by Stabicon, regardless of the physical location, including, but not limited to, personal computers portable computer devices, network servers, access to the Internet, and email access devices. This also includes voice mail and other voice systems, fax machines, telephones, instant messaging, and information obtained or downloaded from and / or disseminated through the internet.

All of Stabicon's Information Technology Resources are the property of Stabicon, which includes all information created, stored or transmitted using Stabicon Information Technology Resources. The only information that is not considered company property is the information obtained during the limited personal use of Information Technology Resources or information that is deemed not to be company property under applicable rules and regulations.

Stabicon's Information Technology Resources should be used for Stabicon Business purposes only. Following uses are prohibited.



- ❖ Harassing discriminating, defamatory, fraudulent or threatening messages, including those that offensively address race, sex, age, sexual orientation, religion, political beliefs, national origin, disability, ethnicity, veteran status, gender identity or any other characteristic protected by applicable law.
- ❖ Sending, accessing or storing any form of offensive or obscene communication or materials.
- ❖ Unauthorized distribution of Stabicon Proprietary, confidential or trade secret information.
- ❖ Causing or permitting security breaches or disruptions of network communication, and / or improperly revealing your password to others or allowing others to use your password.
- ❖ Violations of the right of any person or company protected by copyright, trade secret, patent or other intellectual property right, or similar rules and regulations.
- ❖ Violations of the privacy rights of any person protected by applicable law.
- ❖ Solicitation for any outside organization, venture or cause unrelated to Stabicon, including for example, any commercial, religious or political organization, venture or cause.

Except as limited by applicable laws, Stabicon reserves the right to monitor equipment, systems, and network activities, including, but not limited to, email, voice mail, internet usage and any stored information, in appropriate circumstances and pursuant to applicable laws. In addition, for operations maintenance, security, business, legal or regulatory requirements, authorized personnel and third-party service providers may have unrestricted access to information in Stabicon Information Technology Resources fully permitted by law.

Stabicon reserves the right to terminate any user's access to Stabicon Information Technology Resources at any time, with or without advance notice.

1.13 WE DEAL ETHICALLY WITH SUPPLIERS AND CUSTOMERS.

Our aim in conducting our purchasing operations is to ensure continuing, reliable sources of supply. Honest dealing with customers and suppliers is essential to sound, lasting relationships. Thus, we view our suppliers as partners and expect them to make a reasonable profit. We give all potential suppliers fair and uniform consideration. Decisions are based on objective criteria such as price and quality as well as vendor's



reliability and integrity. Giving or receiving any kickbacks, bribes or similar payments of any sort is prohibited.

We extend no personal favors to customers on prices, or the like; we treat all customers on the same business basis.

1.14 WE DO NOT GIVE OR ACCEPT INAPPROPRIATE GIFTS.

It is not acceptable to give or receive gifts, payments or other benefits to influence any business decision. If we intend to give or receive a gift, payment or other benefit that is more than nominal in value (Rs 1000), then we must contact management for approval before doing so. Also, keep in mind that we may only accept a gift of nominal value from single source one time per calendar year. If it would be embarrassing to the Company for us not to accept a particular gift that may exceed a nominal value, then our acceptance of the gift should be reported to management. Management will assist in determining proper disposition. In addition, we should not arrange for or accept a gift, payment or other benefit that is more than nominal value on behalf of a close family member from anyone with whom the Company has an existing business relationship or would like to establish a business relationship. Follow this rule: never accept a gift or service if it will compromise us or could appear to compromise us. This does not include occasional business meals, which can be reciprocated, or gifts of purely nominal value.

We should be aware that there are special rules governing appropriate conduct in dealing with federal, state, local or foreign governments that differ from rules for dealings with nongovernmental companies. In general, we may not offer or provide government employees with any gift, gratuity or thing of value, including meals or travel, unless pre-cleared by management.

Stabicon's Code of Conduct is sent to suppliers and vendors. They are advised of the requirement to adhere to the Code when working with us or face the possibility of losing our business for failure to do so.

1.15 WE RESPECT TRADE SECRETS AND CONFIDENTIAL INFORMATION OF OTHERS.

It is Stabicon's policy not to knowingly infringe upon the intellectual property rights of others. It is also Company policy to respect the trade secrets or other proprietary information of others. This is particularly important if you have knowledge of trade secrets and proprietary information of a former employer. If any questions should arise in this area, you should consult management.

If any outside of the Company approaches you with an invention, discovery or idea, it is important to protect the company against future infringement or monetary claims, especially in cases where our own efforts or those of our consultants have previously arrived at the same invention, discovery or idea which we wish to apply to a Company product. Do not permit outsiders to reveal any details of their invention, discovery or new idea. Refer all unsolicited ideas, without reviewing them, to the management.



1.16 WE SET HIGHEST STANDARDS FOR OUR SERVICES.

We are committed to ensuring that consumers can trust services of Stabicon for their reliability, Quality and superior performance. In addition to serving our customers in the market where we do business, we must constantly strive to deliver our services in most efficient way possible so that they add value to our customers.

1.17 WE ARE RESPONSIBLE TO CUSTOMERS.

Since our business is providing services, our success depends upon customer satisfaction, trust and goodwill. We can best achieve our objectives and serve the needs of customers by following a consistent, fair and sensitive program of customer communication.

We recognize the importance of anticipating and assuring responsiveness to customer needs preferences in our services. We also believe that customer opinions, concerns and inquires communicated to the Company regarding our services are important sources of information. Customer needs are constantly changing, so we must continually listen to what people want and use our creativity to satisfy these changing needs.

When a customer expresses dissatisfaction, we address the problem promptly, courteously and fairly, and make every reasonable effort to sustain or regain the customer's goodwill and continued purchase of Stabicon's services.

1.18 WE COMPLY WITH COMPETITION/ ANTITRUST LAWS

All employees comply Stabicon's policy fully with competition laws (known as antitrust laws in the U.S) of the country. The purpose of competition laws is to protect the competitive process to benefit consumers. Competition laws ensure that companies compete to get business by offering lower prices, innovative products and better service and not by interfering with the market forces of supply and demand. Competition laws also protect companies from predatory or unfair acts by dominant companies so that the competitive playing field is open and fair to all. Stabicon supports the goals of the competition laws. We believe that our Company performs best in a competitive marketplace.

We must adhere to the letter and spirit of the applicable laws. Competition laws throughout the world prohibit agreements among existing or potential competitors that harm competition. The key to compliance is independence. Stabicon must act independently in its business activities – setting prices, discounts, promotions, and terms of purchase and sale; selecting customers, and suppliers; and choosing the service to sell. It is important to remember that an illegal agreement does not have to be a formal writing or even in writing. It may be a verbal agreement or inferred from a course of



business conduct or comments in documents. An agreement also does not have to be successfully implemented to be illegal.

The competition laws also impose certain limitations on relationships with customers and distributors. Any attempt to deprive customers or distributors of their freedom to determine prices, terms and conditions of sale, or to place undue limitations on their right to operate independently violates the competition laws.

The consequences for Stabicon and its people for not complying with competition laws are extremely serious. Violation of some competition laws can lead to fines and imprisonment for the individuals involved and to even heavier fines for the Company. Moreover, even in the absence of a criminal prosecution, civil lawsuits may be brought to recover damages and attorneys' fees.

1.19 WE COMPLY WITH SECURITIES LAWS

On occasion you may have information about Stabicon or other publicly-traded companies with which Stabicon does business or is negotiating that is "non-public" – that is, not known to the public – such as interim earnings figures, possible acquisitions or divestments, marketing plans or new product introductions.

Information is considered non-public until it has been adequately disclosed to the public, i.e., the information has been publicly disclosed and adequate time has passed for the securities markets to digest the information. If this non-public information is "material" – that is, information a prudent investor would take into account when making an investment decision – then under the applicable securities laws and Company policy:

- ❖ We must not trade for our own account or for the account of another person in stocks, bonds or other securities of the firm (Stabicon or other) to which the material non-public information relates.
- ❖ We must not encourage or induce others, based on such non-public information, to deal in stocks, bonds or other securities of such firms.
- ❖ We must not disclose such non-public information to persons outside Stabicon.
- ❖ You must not needlessly discuss such non-public information with persons inside Stabicon.

1.20 WE DO NOT MAKE POLITICAL CONTRIBUTIONS.

No funds or assets of the Company may be used for contributions to any political party or candidate, whether federal, state, local, in India, or abroad. A political contribution includes both direct (i.e., money) and in-kind contributions. In-kind contributions include the purchase of fundraising tickets, contribution of products, volunteer work by Stabicon people within normal business hours and the use of Stabicon facilities for fundraising or political purposes.



The Company is prohibited from compensating or reimbursing any Stabicon person or individual associated with the Company (including outside lobbyists), directly or indirectly, in any form, for political contributions that the person intends to make or has made.

Individual Stabicon people remain free to make personal contributions to candidates or parties of their choice. A personal contribution is the responsibility and burden of the individual person. Stabicon will accept no responsibility for or obligation with respect to a personal contribution. Further, a personal contribution shall not be made with the intention of assisting Stabicon in obtaining or retaining business.

1.21 WE DEAL ETHICALLY WITH GOVERNMENTS.

We must not seek to influence any government employee's judgment or conduct by promise of gifts or other benefits, or by any other unlawful inducement. Thus, it is important that we not provide any gifts, entertainment or other things of value to a government employee unless we have pre-cleared it with management. In addition, certain lobbying if a Stabicon person communicates with a government employee for the purpose of influencing legislation or certain other official actions. If you are engaging any such activity, you must notify management.

Stabicon's commitment to dealing legally and ethically with governments applies worldwide. Company policy, the India foreign corrupt practices act, and similar anti-bribery Laws around the world prohibit our people or their agents from giving or offering to give money or anything of value – whether in case or not, or whether directly or indirectly through others - to any foreign official (i.e., foreign government employee, foreign political party, or party official or candidate for foreign political party, or party official or candidate for foreign political office) to induce that official to affect any government act or decision, or to assist the company in obtaining or retaining business.

To ensure that you do not violate this standard, it is the company's policy that, except for legally mandated fees (for example, required permit or license fees), no payments or gifts related to the company's business activities will be made to forging officials, directly or indirectly, unless approved in advance by legal as lawful under India and other applicable laws.

Always be direct and honest in dealings and communications with government employees. Any knowing or willful false statements to government employees (oral or written), and particularly any false statement under oath, can expose the company and its people to substantial penalties.

1.22 WE PRESERVE RECORDS ACCORDING TO THE LAW

We comply with all laws and regulations relating to retention of company records (including physical documents and electronic data). The company's record retention program sets forth the company's policies and procedures relating to records preservation to which everyone must adhere.



If the existence of a subpoena, litigation, or an impending government investigation is known or reported to you, immediately contact management. In such a case, you must retain all records that may be responsive to the subpoena, are relevant to the litigation, or that may pertain to the investigation.

1.23 WE COMPLY WITH INTERNATIONAL TRADE REGULATIONS.

In the conduct of both its domestic and overseas operations, the company fully complies with all applicable laws governing imports, exports and the conduct of business with non-Indian entities. Stabicon people must conduct company activities to fully comply with the laws of the countries in which they operate; however, there may be a time when there is a conflict between the laws of one country and those of the United States or company policy. Should you become aware of such a conflict, you should notify your manager.

1.24 WE PARTICIPATE IN LOCAL GIVING AND VOLUNTEERISM.

It is our goal to take part in projects to further the development and welfare of the local community. Such projects include participating in charitable drives and assuming responsibility for aiding the poor, injured and homeless at the time of national disaster. Our primary focus is on people, particularly the welfare of underprivileged people. Company also encourages its people to participate on their own time in local charitable activities of their choice.

1.25 WE WORK WITH GOVERNMENTS ON ISSUES THAT AFFECT OUR BUSINESS.

It is our policy to work cooperatively with local and national governments. From time to time, issues may arise that affect our operations. After careful consideration, the company will offer opinions and recommendations to governments on particular issues to support our business goals and needs.

1.26 WE OPPOSE EXPLOITATIVE, INHUMANE LABOR PRACTICES.

Stabicon opposes the illegal use of child labor, the exploitation of children, and all other forms of unacceptable treatment of workers. Moreover, it is Stabicon's policy not to work with any supplier or contractor known to operate with unacceptable worker treatment such as the exploitation of children, physical punishment, female abuse, involuntary servitude or other forms of abuse. No abuse of child or other labor laws is acceptable to the company, and if any violation of our principles becomes known to the company, it is grounds for immediately terminating the business relationship.

1.27 WE DEMONSTRATE OUR COMMITMENT TO UNIVERSAL HUMAN RIGHTS.

Stabicon is committed to respect human rights worldwide. To that end, Stabicon practices and seeks to work with business partners who promote the following standard:



- ❖ Equal opportunity for employees at all levels regardless of color, race, gender, gender identity, age, ethnicity, national origin, sexual orientation, marital status, veteran status, disability or any other characteristic protected by law ;
- ❖ A safe and healthy workplace protecting human health and the environment;
- ❖ Paying employees a wage that enables them to meet at least their basic needs, and providing employees the opportunity to improve their skills and capabilities;
- ❖ Respecting employees 'lawful freedom of association; and
- ❖ Working with governments and communities in which we do business to improve the educational, cultural, economic and social well-being in those communities.

1.28 WE ARE COMMITTED TO SUSTAINABILITY

At Stabicon, sustainability is a long-term business imperative, critical to the success of the company. It is rooted in our values of teamwork and continuous improvement. Our focus is on people, performance and planet.

In addition, we are committed to achieving our sustainability objective of ensuring that Stabicon's business grows consistently and responsibly and benefit those we serve, including employees, our shareholders and other stakeholder and other stakeholders while promoting the well-being of future generations.

1.29 WE SAFEGUARD AND PROTECT THE ENVIRONMENT

The company is committed to protecting the environment. Therefore, we must each comply strictly with the letter and spirit of applicable environmental laws and regulations and the public policies they represent. No individual or manager in the company has authority to engage in conduct that does not comply with this policy, or to authorize, direct, approved or condone such conduct by any other person.

We will promote open communication with the public and seek an active and productive partnership with the communities in which we operate. We will continue to share information with consumers about our environmental policy and programs and work with community leaders and all others who share our commitment to protect our environment for future generations.

In our ever-changing world, Stabicon places a high priority on operating in a responsible and respectful manner. We know that there is still much to be accomplished. Our ongoing strategy to reduce our environmental footprint will remain an integral part of delivering our services.



1.30 WE UPHOLD GOOD CORPORATE GOVERNANCE TO PROTECT SHAREHOLDER VALUE

The Company's corporate governance policies and programs, of which this code of conduct is a Key.

1.31 COMMUNICATION AND DISCLOSURE ARE ESSENTIAL

In accepting employment with Stabicon, each of us becomes accountable for compliance with these standards of conduct, with all laws and regulations. Managers are responsible for communicating these standards to those they work with, ensuring that they understand and abide by them, and creating a climate where people can discuss ethical and legal issues freely.

1.32 YOU ARE ENCOURAGED TO SEEK GUIDANCE

This code cannot provide definitive answers to all questions. For that we must ultimately rely on each person's good sense of when it is proper to seek guidance on the appropriate course of conduct.

In most instances, you should bring questions concerning the guidelines described in this code to the attention of your direct manager.

1.33 YOU MUST REPORT SUSPECTED VIOLATIONS

If you know of or have a good reason to suspect a violation of the code or other company guidelines, you are required to immediately report that information to your manager without fear of reprisal. Stabicon will not retaliate against any individual who reports information concerning potential violations in good faith, or who participates in any information provided is found to be intentionally false. The company will also take all necessary steps to keep an individual's identity and the information where that disclosure is:

- ❖ Unavoidable in order to conduct an effective investigation and take appropriate action or
- ❖ Otherwise required by applicable law.

1.34 NON RETALIATION POLICY

No adverse action will be taken against anyone for complaining about, reporting, participating or assisting in the investigation of a suspected violation of the code of conduct, unless the allegation made or information provided is found to be intentionally false. To the maximum extent possible, Stabicon will maintain the confidentiality of all complaints.



1.35 DISCIPLINARY ACTIONS MAY BE TAKEN

The company's policy is "zero tolerance" for any conduct that violates the code of conduct. As such, the company intends to prevent the occurrence of conduct not in compliance with the code and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Stabicon people who violate the code may be subject to disciplinary actions, up to and including termination.

1.36 THE CODE APPLIES TO ALL OF STABICON ACTIVITIES

The code is applicable to all everyone who worked for Stabicon, including officers, and applies to the company's directors and agents in accordance with applicable law. The management of the company consisting of the board of directors of the company shall be responsible for the overseeing of ethical business practices.

The code is also applicable to vendors, suppliers and third party contractors working for our company and adherence to the code is a condition for conducting business with Stabicon.

Vijay Kumar Ranka

Managing Director