

Code of Conduct Policy

Objective

The objective of the policy is to define the ethical behaviour & value system which company expects its employees to follow under all normal circumstances.

Scope

The code of conduct guidelines applies to the Staff & above cadre employees. For workmen; Certified Standing Orders of the company shall apply.

DCM's Values

The following values have been prescribed which every employee of DCM is expected to imbibe & live by it:

- **Customer Focus:** It is the customer for which we work & it is our responsibility to make him satisfied. Customer here includes external as well internal.
- **Innovation:** DCM employees are required to continuously initiate & innovate new work practices which give company a competitive advantage & also make steady & continuous improvements in the process.
- **Tenacity:** never stop till the end. Whatever the circumstances may be; DCMites are expected to work diligently & restlessly till the objective is achieved.
- **Team Work:** Team work is one of the strongest values which we expect everyone to embrace along with other values. We believe that nothing can be achieved while working in Silos. It is the united efforts of all employees which will make us rise further.
- **Integrity & Transparency:** We expect that all employees work in fashion where company's objective & interest is the top most priority. We also expect employees to be transparent in their dealing internally & externally as well & there should be no place of hiding & concealing any of the transaction. Loyalty to the company & its business shall also fall under category of integrity.
- **Fair & just to employees:** The Company shall remain, in all its dealings with employees, completely fair, unbiased & just. Employees' interest & rights shall be fully protected, whether said or unsaid, & opportunities for growth & development shall be equally extended to all. Every employee shall be expected to work in a fair & just manner with all other employees. Trust, teamwork, mutuality and collaboration, meritocracy, objectivity, self respect and human dignity are the things which are expected while dealing with employees.

- **Respect for individual:** The Company's vision is based on inspiring and unleashing creative potential in human assets of the Company. This is possible in an environment where we all respect the rights of those around us. In this direction, we endeavor:
 - a) To treat individuals in all aspects of employment solely on the basis of ability irrespective of race, caste, creed, religion, age, disability, gender, sexual orientation or marital status.
 - b) Not to tolerate racial, sexual or any other kind of harassment.

Ethical Behaviour

Ethical behaviour is described as the personal conduct which is within prescribed limit of company's values, image & objectives. The following are a few guidelines which company expects its employees to follow:

- **Confidentiality & Secrecy of information:** The information on cost, design & finance any-other information which is crucial to the company's business & which our competitor may use for its benefit shall be kept confidential unless such information is publicly available. Such information must be held in confidence and used only for the purposes of the business of the company and not disclosed otherwise unless authorised to do so or required to do so under law. Any disclosure of said information intentionally & unintentionally shall fall under category of unethical behaviour.
- **Dealing with Suppliers:** The dealing with suppliers shall be transparent. No gifts, in cash or in kind, shall be accepted from any other supplier by any of the company's employees. If any nominal gifts are received at time of Diwali / New Year or any other occasion, the disclosure of the same shall be made to CEO of the company.
- **Dealing with Customers:** All employees of the company shall deal with all customers in an appropriate manner which enhances the image of the company. Every customer is important & equal care shall be provided to all.
- **Legal Compliance:** It is the Company's policy to comply fully with all applicable laws and regulations. Ensuring legal and regulatory compliance is the responsibility of concerned employees & the Management. The Company cannot accept practices which are unlawful or may be damaging to its reputation. Top management must satisfy them that sound and adequate arrangements exist to ensure that they comply with the legal and regulatory requirements impacting business and identify and respond to developments in the regulatory environment in which they operate. In the event the implication of any law is not clear, the clarity on the same should be taken.
- **Avoidance of Conflict of Interest:** All employees must avoid situations in which their personal interest could conflict with the interest of the Company. This is an area in which it is impossible to provide comprehensive guidance but the guiding principle is

that conflict, if any, or potential conflict must be disclosed to higher management for guidance and action as appropriate.

- **Protection of Company Assets & Facilities:** Protecting the assets of the company is a key responsibility of every employee. So, every employee is liable to protect and safeguard the assets & facilities of the company against any misappropriation, loss, damage and ensure their efficient use. They must ensure that assets are not put into use, sold, loaned, or dealt with in any other manner without appropriate authorization. All company assets should be accounted for and used only for legitimate business purposes of the company. No employee shall misuse Company facilities. In the use of Company facilities, care shall be exercised to ensure that costs are reasonable and there is no wastage.
- **Leading by Example:** Through both their words and their actions, the organization's leadership conveys what is acceptable and unacceptable behaviour. Employees must constantly reinforce through their actions and behaviour that DCM stated value system is rooted in individual conviction and personal integrity.
- **Bribery and Corruption:** The company is committed to maintain zero tolerance towards any act of bribery or corruption or fraud by its employees within the organization or outside with any agent, clients, suppliers, contractors, competitors, and government officials etc.
- **Disciplinary Action:** The company is committed to maintain a healthy and conducive work environment for its employees by abiding the Code of Conduct & Whistle Blower Guidelines as well as implied labour laws and regulations. Also, company is bound to act upon any such act(s) by its employee who is found to be in contrary to the company philosophy or any act(s) which willingly implies contrary to the purpose of this policy, as per the Standing Order of the Company.

For DCM Nouvelle Limited

**Sd/-
Rakesh Goel
Whole Time Director**

Date: 05.05.2022

Place: Hisar

***The policy has been approved/signed by the whole time Director of the Company on May 05, 2022**