

Code of Conduct



GRAVITA



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GRAVITA'S EMPLOYEE

CODE OF ETHICS AND CONDUCT

Gravita is providing this Model Code to assist its employees in their corporate compliance efforts. This is not intended to be used as an "off the shelf" document without additional review. Rather, it is important to tailor the Model Code to include in our corporate policies and add any relevant information.

Please remember that a Code of Ethics and Conduct is just one part of an effective corporate compliance program. The information provided in this model code is not legal advice and should not be construed as such.



MESSAGE FROM CEO AND MANAGING DIRECTOR

Dear Employees,

Gravita is proud of its reputation as an organization that strongly values integrity, respect, and truthfulness. This reputation enables us to reach new heights in its industry space, hire the best available talent, maintain the confidence of the employers that hire them, and retain the highest quality employees.

Gravita's Employee Code of Ethics and Conduct outlines the general ethical standards that all of our employees are expected to live by. While this Code does not address all ethical concerns that you may face during your employment, We hope it will give you the information you need to make ethical decisions on a daily basis. And, We hope you will feel comfortable asking for guidance whenever you need help.

Thank you for helping Gravita continues its commitment to a workplace that sets a positive example for our employees and affiliates.

Sincerely,

(Yogesh Malhotra)
Chief Executive Officer

(Rajat Agrawal)
Managing Director

I. INTRODUCTION

This Employee Code of Ethics and Conduct (“Code”) details Gravita's policies for employees. Gravita is committed to a quality business and reputation that values integrity, respect and truthfulness, and a strong commitment to the highest ethical standards. These principles apply to employee interactions with customers, co-workers, vendors, government and regulatory agencies and the general public. This Code applies to all entities under the umbrella of Gravita Group, their respective Board of Directors, and employees [collectively “employees”]. Gravita's employees must be familiar with this Code and adhere to its guidelines.

This Code is not a comprehensive guide of all ethical issues that employees may face, but merely highlights specific problems. In dealing with ethical problems not detailed in this Code, employees are expected to use common sense and their best moral judgment. **If an employee has ethical questions, please contact Head of HR Function.** This policy may be modified or updated at any time. Gravita welcomes employee suggestions on changes in this Code.

II. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Gravita believes and practice to observe all laws, rules, and regulations of government agencies and authorities, applicable to the Organization. This specifically includes requirements under the various Corporae Laws, Taxation laws, Labour Laws, Cyber Laws, Environment related laws and so on, as amended, the policies of accrediting agencies, as well as other state and federal laws. If federal, state or local law exists that is either contradictory or stricter than this policy, the employees must apply the law.

III. CONFLICTS OF INTEREST

Gravita's employees must avoid having a personal, business, financial, or other interest, activity or relationship, outside Gravita that has or may be in conflict with Gravita or its customers. **Any material transaction or relationship that may give rise to an actual or perceived conflict of interest should be discussed with Chief Executive Officer.**

Conflicts of interest may include, but are not limited to, the following situations:

- ❖ Outside Employment- employees should not perform work or render direct consulting or managerial services for an organization that competes or does business with Gravita without appropriate approval from management.
- ❖ Managers or supervisors should not engage in a sexual, romantic, or dating relationship with sub-ordinate employees or trainees.
- ❖ Accepting loans or gifts of entertainment, food, or cash of high value (say of Rs 5000/- or more) or more from vendors, subordinate employees, regulatory or any outside concern that does or seeks to do business with or is a competitor to Gravita.
- ❖ Obtaining a personal financial benefit in any sale or loan of company property.
- ❖ Performing services for customers outside those consistent with Gravita's mission of providing highest quality products and services.
- ❖ Using or disclosing any confidential information gained during employment for an employee's personal benefit or the benefit of others, including a future employer.

IV. EMPLOYMENT PRACTICES

All employees of Gravita Group shall consider and follow the under stated practices:

Discrimination and Harassment

- ❖ Gravita prohibits discrimination and harassment of customers, vendors or employees whether or not the incidents occur on Gravita's premises and whether or not the incidents occur during business hours.
- ❖ Gravita follows federal, state, and local law to ensure equal recruitment, employment, compensation, development and advancement opportunity for all qualified individuals, and prohibits deliberate harassment based on federally protected categories of race, color, religion, sex, national origin, age, or disability.

- ❖ **Workplace Violence** - Gravita does not tolerate workplace violence including threats, threatening behavior, harassment, intimidation, assaults, abusive language or similar conduct.
- ❖ **Weapons Policy**- Gravita's employees should not carry firearms or other weapons on Gravita's facilities unless obtaining prior permission.
- ❖ **Illegal Drugs and Alcohol Policy** Gravita's employees must not distribute, possess or use illegal or unauthorized drugs or alcohol on Gravita's property, or in connection with Gravita's business.

V. BOOKS AND RECORDS

Accurate and Complete Business Records - Employees must act in good faith not to misrepresent material facts in Gravita's books and records or in any internal or external correspondence, memoranda, or communication of any type, including telephone or electronic communications.

Financial Reporting- All Gravita's funds, assets, liabilities and receipts must be recorded in accordance with generally acceptable accounting procedures. There cannot be any "off the books" accounts.

Proper Maintenance of Records- Gravita maintains documents in accordance with all applicable laws and regulations. If Gravita's employees receive a subpoena or summon, a request for records or other legal papers or if we have reason to believe that such a request or demand is likely, the law requires Gravita to retain all relevant records then contact the Head of Finance Function.

Cooperation with Auditors- Gravita's employees must cooperate fully with internal and outside auditors during examination of Gravita's books, records, and operations.

VI. ADMISSIONS PROCESS

Business Communications- Employees must avoid public statements regarding issues or matters of Gravita about which they are not authorized spokespersons.

Advertising and Marketing- Gravita's policy takes necessary steps to assure that all advertised products or services in any of its literature, exhibits or other public statements is true, supported by documentation, and does not mislead customers and any other respective Authority.

VII. USE OF COMPANY RESOURCES

For a comprehensive description of Gravita's policy on use of company resources, please see the respective policies like IT Policy, Mobile policy etc.

Internet and Electronic Mail Policy

- ❖ Employees may use Internet and send and receive electronic mail solely for business purposes.
- ❖ Gravita's electronic mail system is a company resource, and Gravita reserves the right to read, view and copy any email communications.
- ❖ Employees must take reasonable care not to disclose confidential information, or acquire unauthorized information over the Internet.

Equipment and Supplies- All equipment and supplies purchased by Gravita remain Gravita's property, including but not limited to office supplies, office furniture, fax machines, computers, software, hardware, supplies and equipment, and should not be used by Gravita's employees for personal reasons.

Political Activity- Gravita encourages employees to participate in the political process on their own time. Employees should not use Gravita's resources, reputation or assets to support a political candidate.

Non-work Related Interests- Gravita's employees should not use Gravita's facilities to promote non- Gravita or non-work related interests of the employee or of third parties without prior consent of their supervisor.

Proper Use of Organizational Assets- Gravita's employees should only use, transfer, or dispose of funds or assets for the lawful and legitimate business purposes for which they were approved by their respective Head of the Department or the Management.

VIII. PRIVACY AND CONFIDENTIALITY

Confidential Information- Gravita's employees must exercise care to avoid disclosing non-public, internal, secret, or proprietary information related to Gravita or its vendors/customers to unauthorized persons, either within or outside Gravita during employment or afterwards, except as such disclosure is legally mandated or approved by Gravita Management.

Employee Access to Confidential Information- Only Gravita's employees that

truly need to know confidential information to conduct their business have access to confidential information and must take necessary steps to keep this information private and confidential.

Confidential Information of Employees- Employment and medical records of Gravita's employees are confidential and private. Medical Records may only be disclosed if the employee provides a written release required by applicable law.

Financial Information of Current and Former Vendors/Customers must be protected as required by privacy laws and regulations.

IX. RESOURCES:

Contact Information:

- ❖ Gravita's Human Resources department
- ❖ Ombudsman, if applicable
- ❖ 24 hour employee hotline, if applicable
- ❖ Legal Department/ General Counsel
- ❖ Outside Counsel (If assigned)
- ❖ Company-wide representative in case of subsidiaries/associate/Joint Ventures companies or firms or partners

X. COMPLIANCE WITH THE CODE

All Gravita employees must read and understand this Code and adhere to its guidelines. If questions arise please contact Head of Human Resources.

Functional Heads- Functional Heads must take reasonable care to assure that subordinate employees are complying with these guidelines. Functional Heads are responsible for misconduct by employees if the Functional Head orders misconduct; ratifies the conduct, even by inaction; the Functional Head has direct authority and aware of the conduct but fails to act appropriately; or should have known with reasonable diligence that the actions occurred.

XI. REPORTING ACTUAL OR SUSPECTED VIOLATIONS OF THE CODE

Requirement to Report Actual or Suspected Violations of the Code: Employees must report any actual or suspected violations of this Code to Head of Human

Resources or Head of Legal Function. Failure to report any actual or suspected violations of the Code is in itself a violation of this Code.

Non-Retaliation Policy: Employees will not be retaliated against or subject to any form of reprisal for raising a good faith concern under this policy or participating in an investigation into any such concerns. Retaliation is a serious violation of this Code and should be reported immediately.

Investigation of Alleged Violations of the Code: All inquiries, complaints, and reports will be promptly investigated. Employees are expected to cooperate in the investigation. Reasonable measures will be taken to preserve confidentiality of the claim and the identity of anyone who reports a suspected violation or participated in the investigation. If you are unsure whether a violation has occurred, Gravita encourages you to seek advice from Head of HR Function before acting.

Hotline- (if applicable)- Gravita has established a toll-free Company hotline. If you have any question or concern, you may call the employee hotline on any working days. Your question will be considered confidentially.

XII. ZERO-TOLERANCE POLICY TOWARD VIOLATIONS OF THE CODE

Gravita takes a zero-tolerance approach to violations of this Code, failure to report actual or suspected violations of the Code, or retaliation against whistleblowers. Employees that are found to have violated this Code or retaliated against whistleblowers will have their employment with Gravita terminated.



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