

CODE OF ETHICS AND BUSINESS CONDUCT

Our commitment to integrity, fairness, quality and responsible business

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Approved By	Director

This Code sets out the ethical standards that guide our business and our relationships with customers, suppliers, employees and other stakeholders.

1. Purpose

Our Code of Ethics and Business Conduct establishes the principles and standards that guide our business activities. We are committed to conducting our business with integrity, honesty, fairness, accountability and respect for all stakeholders.

We expect our employees, management, suppliers, contractors and business partners to uphold these principles in their dealings with our company.

2. Ethical Business Practices

We conduct our business honestly, transparently and professionally. We do not engage in fraudulent, deceptive, misleading or unethical business practices.

All business transactions, quotations, purchase orders, invoices and other records must be accurate, complete and maintained in accordance with applicable requirements.

3. Compliance with Laws and Regulations

We are committed to complying with applicable laws, regulations, contractual obligations and relevant industry requirements in the locations where we operate.

Our employees and business partners are expected to understand and follow the legal and regulatory requirements applicable to their activities.

4. Anti-Bribery and Anti-Corruption

We do not tolerate bribery, corruption, kickbacks, facilitation payments where prohibited, or any improper advantage intended to influence a business decision.

Employees and representatives must not offer, request, give or accept improper payments, gifts or benefits. Any permitted business courtesies must be reasonable, transparent and consistent with applicable laws and company requirements.

5. Conflict of Interest

Business decisions must be made objectively and in the best interests of the company and its customers.

Employees must disclose actual, potential or perceived conflicts of interest, including personal or financial relationships that could improperly influence supplier selection, purchasing decisions or customer transactions.

6. Fair Competition

We support fair and lawful competition. We do not engage in collusion, price-fixing, bid-rigging, improper sharing of competitors' confidential information or other anti-competitive conduct.

Our commercial dealings must be based on fair evaluation, legitimate business requirements and professional conduct.

7. Supplier and Business Partner Responsibility

We aim to establish professional relationships with suppliers and business partners who demonstrate integrity, reliability, product conformity and responsible business practices.

Supplier selection and evaluation should be based on appropriate criteria, including quality, delivery performance, price, service, compliance and the ability to meet agreed specifications.

We expect our suppliers and business partners to comply with applicable laws and to avoid unethical, fraudulent or corrupt practices.

8. Quality and Customer Commitment

We are committed to supplying products that meet agreed customer requirements, specifications and applicable regulatory requirements.

We strive to provide accurate product information, maintain appropriate purchasing and delivery records, preserve product identification and traceability where required, and communicate honestly regarding product quality, availability and delivery commitments.

Any identified non-conformity or customer complaint will be addressed appropriately, with corrective action taken where necessary.

9. Confidentiality and Data Protection

We respect the confidentiality of customer, supplier, employee and company information.

Confidential information, commercial terms, technical documents, drawings, personal data and business records must be protected from unauthorized access, disclosure, alteration or misuse.

Information may be shared only with authorized persons and for legitimate business purposes, subject to applicable requirements.

10. Respectful Workplace and Human Rights

We are committed to treating people with dignity, fairness and respect.

We do not tolerate harassment, discrimination, bullying, forced labour, human trafficking or child labour in violation of applicable laws.

Employment-related decisions should be based on legitimate business requirements, qualifications, performance and applicable legal requirements.

11. Health, Safety and Environmental Responsibility

We strive to maintain safe working conditions and comply with applicable health, safety and environmental requirements relevant to our operations.

Employees and business partners are expected to follow applicable safety procedures, report unsafe conditions and handle products, packaging and waste responsibly.

We encourage practical measures to reduce waste and use resources responsibly.

12. Accurate Records and Responsible Use of Company Assets

All financial, purchasing, sales, inventory, quality and delivery records must accurately reflect business activities.

Company assets, funds, equipment, information and resources must be used responsibly and only for authorized purposes.

Falsification of records, unauthorized transactions and misuse of company assets are prohibited.

13. Reporting Concerns and Non-Retaliation

Employees and business partners are encouraged to report suspected misconduct, unethical practices, conflicts of interest, fraud, corruption or violations of this Code.

Concerns may be raised with management through the company's designated reporting channel: shashi@shalcon.co.in

Reports will be handled appropriately, with confidentiality maintained to the extent reasonably possible and permitted by law.

Retaliation against anyone who raises a concern in good faith or participates in an investigation is not tolerated.

14. Responsibilities and Implementation

Management is responsible for communicating this Code, promoting ethical conduct and addressing reported violations appropriately.

Employees are expected to understand and follow the principles outlined in this document. Suppliers and business partners are expected to uphold equivalent ethical standards in their dealings with our company.

Violations may result in appropriate corrective or disciplinary action, subject to applicable laws, contractual obligations and company procedures.

15. Review and Continuous Improvement

This Code will be reviewed periodically and updated when necessary to reflect changes in applicable requirements, business operations or company commitments.

We are committed to continually improving our ethical standards and maintaining the trust of our customers, suppliers, employees and other stakeholders.

Document Approval

Approved by: Shashibhushan D S

For: Shalcon Instruments Private Limited

Date: 7 September 2026