

Business ethics policy of Flex Foods Limited

As a responsible food processor Flex Foods Limited, Dehradun, realizes its obligation to comply with the law of land and deal ethically with customers, suppliers, and other stake holders.

Our policy on Business Ethics helps us in identifying and resolving some of the ethical issues that may arise in the conduct of our business. Our *Core Values* express our commitment to responsible behaviour and are outlined in our policy. We designed our principles and disclosure processes stated in this *Policy* to encourage transparency and dialogue among our employees.

Integrity is our most important asset. Each of us bears a responsibility for protecting the company's good name. To maintain and enhance that reputation, it is important for each of us to adhere to the highest moral, ethical and legal standards. Only by conducting business in this manner can the company progress and preserve the respect of customers, suppliers and other stake holders.

This *Policy on Business Ethics* must be understood and implemented in everyday business practice throughout our company. All suppliers and service providers are expected to practice and adhere to these policies in their business conduct.

Compliance with the law

Compliance with laws and regulations applicable to the company, is of foremost importance to us. We shall strive to keep our-self update and compliant on all applicable requirements.

Bribery

Bribery in any form is forbidden in the conduct of the business of the company. No company funds or assets are to be used, directly or indirectly, for any bribe or other unlawful payment.

Accounting practices

The company will follow accepted accounting rules and controls. The company's books of accounts shall accurately reflect these rules and controls. All assets of the company shall be accounted for carefully and properly. No payment of company funds may be approved or made with the understanding that any part of the funds will be used in a manner contrary to this policy.

Conflicts of interest

The company shall avoid situations in which there is, or may seem to be, a conflict between the personal interests of the employees and the interests of the company. The term "conflict of interest" describes any circumstance that could cast doubt upon employees, suppliers and service provider ability to act with total objectivity regarding the company's interests.

Supplier relations

Much of company's reputation for integrity and fair play comes from the manner in which we deal with our suppliers. The company makes every effort to deal fairly and impartially with all suppliers of goods and services, showing them the same courtesy and consideration we would expect them to show us. Our choice of a supplier will be made purely on the basis of supplier's competence to supply products or services as per company's specifications for product and/or services procured.

Similarly, we expect our suppliers and service providers to practice and implement these policy terms in their day to day functioning and conduct of business.

Gifts and Entertainment

There are three important principles behind the company's position on gifts and entertainment:

1. gifts or entertainment received by employees must not influence or appear to influence decisions about how the company conducts business;
2. employees may not benefit personally from company business with suppliers or others or derive personal gain from transactions made on behalf of the company;
3. to the extent feasible, expenditures by suppliers should be limited, and applied to reduce the cost of goods or expenses for the ultimate benefit of the company and customers.

Corporate hospitality

Hospitality toward stake holders and those with whom the company does business is both proper and appropriate, as long as it does not exceed common courtesy and is not of such magnitude as to suggest the compromise of the parties with whom we are dealing. No gift or entertainment may be tendered that would exceed reasonable standards. *All such acts should be undertaken with the expectation that they will become publicly known.*

Political contributions and involvement

The company encourages all employees to vote and to participate fully in the political process. Such participation is entirely personal. *The organization does not discriminate with employees having association with any organization, political parties and various worker welfare associations.*

Confidential information and trade secrets

The company's ability to compete, moreover, depends upon protection of its confidential information and trade secrets. In business and personal conversations, employees, contractors, suppliers and service providers should limit comments about the company to information that has been publicly released by the company.

Non-public information about the company should always be treated as confidential.

We expect our employees, suppliers and service providers not to disclose, under any circumstances, trade secrets to company's competitors or others, even after leaving employment with the company.

Trade secrets may include organization's customers and their information's, product specifications, manufacturing formulas, equipments, software, quality and product safety operating management systems and other applications of technology used by the company, as well as business methods and cost information.

Competition

Employees, contractors, suppliers and service providers must not enter into discussions or arrangements with competitors or suppliers that may hamper business of the company. For example, pricing of products must never be discussed with competitors either directly or through third parties. Violation of this policy may attract suitable action as per disciplinary & supplier's performance evaluation procedures of the company.

Media Relations

Employees must obtain prior approval of Vice President, prior to speaking at a meeting or conference. Because the press and our competitors often attend these conferences and meetings, all remarks should be scrutinized in advance, especially to ensure that confidential information is not disclosed. There should also be a clear benefit to the company that justifies participation.

Customer relations

Our company will succeed only if we serve customers well. All customers deserve friendly, courteous treatment without bias or discrimination. Our customers have the right to adequate information concerning the prices, quality and safety of the products they purchase and the assurance that their purchase, combining price, product quality and safety, represents a fair value.

Customers deserve prompt, helpful and courteous responses to questions, complaints, feedbacks and requests for assistance. Customers deserve clear and accurate product information to assist them in making correct purchase decision and product usage.

Employee relations

The company is committed to a policy of equal opportunity for all employees without regard to race, color, religion, gender, national origin, age, disability, sexual orientation, or gender identity. It is the goal of the company to provide jobs that are satisfying and challenging to each individual. The safety and health of employees is paramount, and working conditions will reflect this. The company will provide for growth and development through training programs, on-the-job experience and periodic monetary increments. The company is committed to dealing fairly and equitably with each employee.

Policy on Sexual Harassment and other forms of Harassment and Abuse Under the guidelines

The company is committed to provide a workplace environment free from unlawful discrimination, which includes sexual harassment and other forms of harassment and abuse on account of one's race, color, religion, gender, national origin, age, disability, medical condition, sexual orientation, or gender identity.

Policy on Prohibition of Forced, indentured and bonded Labour

The company is committed to enforce complete prohibition on forced, indentured and/or bonded in work practices as per national legislative requirements and ILO recommendations.

Policy on Prohibition of Child Labour

The company is committed to enforce complete prohibition on child labor in work practices as per national legislative requirements and ILO recommendations. No child below 18 years of age shall be engaged on temporary, permanent and contract basis.

The organization expects its suppliers, contractors and other service providers to strictly adhere and maintain compliance to policy terms on prohibition of child labor.

Policy on minimum wages, working hours, overtime, compensation and benefits

The company is committed to provide employment as per the applicable labour laws and ILO recommendations on minimum wages, working hours including overtime, compensation and benefits. Records of compliance to the requirements shall be maintained.

The organization expects its suppliers, contractors and other service providers to strictly adhere and maintain compliance to labour laws in its conduct of business.

Policy on Freedom of Association and Collective Bargain

The company is committed to the welfare of labour. The management of the company does not discriminate with employees having association with any welfare associations and political parties.

As a proactive step, the organization welcomes views, suggestions and grievances of employees and provide timely resolution to the satisfaction of the majority.

Policy on Disciplinary Action

Discipline, compliance to organization's policies and procedures are prime focus areas at Flex Foods Limited.

Violation of organization's policies and procedures by any employee shall attract disciplinary action based on the principles of natural justice and laws of the land.

The organization is committed to provide equal opportunity of representation and appeal to the satisfaction of both parties (complainant and the accused) to ensure fair trial and justice.

Policy on Grievance redressal

The organization welcomes grievance and incidence reporting related to issues such as forced/bonded labour, child labour & abuse, discrimination, harassment & abuse, legal minimum wages rates, working hours & conditions, health & safety, organization's labour employment benefits and compensation policies.

The organization endeavors to provide early and timely resolution on the reported issues of policy violation and personal grievances.

Policy on Environment Protection, Employees Health and Safety

Flex Foods Limited is committed to take adequate precautions and measures, related to protection of environment, worker's health and safety in all our activities, products, services and business processes, in order to conserve our valuable natural resources, minimize pollution to protect environment and provide a workplace to its employees that is free from accidents, injuries and exposure to hazardous chemicals through continual improvement in our EHS performance, and compliance to applicable EHS statutory, regulatory and other requirements to which it subscribes to.

Flex Foods Limited is committed to communicate its EHS policies, concerns and performances within the organization, to its customers, stake holders and society, at large and also, to respond to EHS concerns of the society, by proactively addressing them in our operations.