A large, abstract, light blue graphic that resembles a stylized 'C' or a speech bubble, with a diagonal line crossing through it, is positioned in the background on the right side of the cover.

CODE OF CONDUCT

PREAMBLE

This “Code of Conduct” (COC) is meant to establish robust and clear direction for the personal and inter-personal norms to be adhered by all the stakeholders of Rucha Engineers Pvt. Ltd. (RUCHA) in conducting its business.

RUCHA is committed to ensuring that all aspects of its business are not only adhering to core beliefs and value system of the organization but also are in line with the relevant ethical, professional and legal norms .

RUCHA is also committed to create a workplace is free from harassment and discrimination, where co-workers are respected and provided an appropriate environment so as to encourage good performance and conduct.

RUCHA has always believed in a pro-employee approach and with the necessary adoption of the mutual beneficial initiatives to communicate that people committed to excellence are valued and welcome at our organization.

While intentions behind establishing this COC is to drive all the stakeholder towards a common goal but our Code, however, cannot possibly address every situation we face at work. Therefore, the Code is by no means a substitute for our good judgment, upon which RUCHA depends. We must remember that each of us is responsible for our own actions and that the ethical choice is always the best choice.

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OUR VALUES

RUCHA has adopted a value framework which are essentially non-negotiable ideas and convictions to fundamentally guide our actions and behaviour

R ESPECT	HONOUR, DIGNITY & SANCTITY
U RGE	STRIVE FOR INNOVATION AND EXCELLENCE
C ONFIDENCE	WELCOME AND EMBRACE CHANGE
H ONESTY	STAND FOR TRUTH & TRANSPARENCY
A MBITION	STRONG DRIVE FOR GROWTH

OUR COMMITMENT

Policies are essentially business relevant framework of principles, intentions and standards to guide our governance and conduct. Key policies adopted by RUCHA are as under and all the employees are expected to be aware of and be guided by them



RUCHA
ENGINEERING 2.0

Quality Policy

We believe that quality is generated at heart and delivered by hands.

Customer delight is our prime goal. We aim to achieve it by continually and cost effectively improving our products and processes.

We shall adopt proactive team-based approach, TQM principles and appropriate technology to improve our overall quality and reliability.


Umesh Dashrathi
Managing Director

18 August 2014
Rev. No : 01



RUCHA
ENGINEERING 2.0

TPM Policy

We are committed to value creation and customer delight through continual improvements in productivity.

We shall adopt and practice TPM (Total Productive Maintenance) principles and techniques for this.

We believe technology and active involvement of all employees is key to this.


Umesh Dashrathi
Managing Director

18 August 2014
Rev. No : 01




RUCHA
ENGINEERING 2.0

EHS Policy


We are committed to environmental conservation and ensuring occupational health & safety of our employees.

We shall comply with all the legislative obligations in this respect. We shall further endeavor to constantly evaluate any adverse impact our business activities may have in respect of environment or healthy & safe working conditions and continually improve upon them.

We believe technology and active involvement of all employees is key to this.


Umesh Dashrathi
Managing Director

18 August 2014
Rev. No : 01




RUCHA
ENGINEERING 2.0

Information Security Policy

We are committed to understand and effectively manage the Information Security related risks in our core business activities, functions and processes in order to provide greater certainty and confidence to our customers, employees, suppliers, service providers and to the larger community in which operate.

Management is responsible to adhere to the best practices in this regard and minimize any current or future potential risks related to Information Security.

We believe that information is a strategic asset that is essential to achieve core mission and objectives of the business and hence protection of confidentiality and integrity of the information as well as compliance with all the relevant statutory and counter-party requirements is key to it.


Umesh Dashrathi
Managing Director

03 October 2018
Rev. No : V_02

EQUAL OPPORTUNITY EMPLOYER

At RUCHA, we strive to provide a work environment free of discrimination and harassment. We are an equal opportunity employer and employment decisions are based only on merit and business needs.

We are committed to following fair employment practices that provide equal opportunities to all employees. We do not discriminate or allow harassment on the basis of race, colour, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status or any other legally protected status. At RUCHA, we value diversity and believe that a diverse workplace builds a competitive advantage.

To put these values in practice, all of us must ensure that decisions affecting employees are based on business factors only. For instance, decisions regarding hiring, promotion, termination, transfer, leave of absence or compensation should only be based on relevant business factors.

We must also ensure that we never verbally or physically mistreat others or engage in an offensive behaviour and we should not tolerate those who do. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence and any other conduct that interferes with a co-worker's ability to do his or her job.

The Company's Anti-Discrimination and Anti-Harassment Policy applies to all persons involved in the operations of the Company and prohibits harassment by any employee of the Company towards other employees as well as outside vendors and customers.

If you believe that you have been discriminated against, harassed or have not been given equal opportunities at work, you are encouraged to submit a complaint to:

- Your reporting manager
- Your Function Head / Plant Head
- HR Manager

ENVIRONMENTAL & SOCIAL RESPONSIBILITY

RUCHA intended to go beyond statutory norms to set culture of thinking over and above financial benefits and promote positive social and environmental change.

Environmental and social stewardship is also key factor for holistic business growth. We are part of the society and it is our duty and responsibility to give back to the society at large for its direct & indirect, tangible & intangible, known & unknown contribution in our business.

We ensure environmental sustainability by being vigilant about our impact on air, water and sanitation through various initiatives like green energy, afforestation etc.

We advocates legality and uphold the basic principles of responsible and fair business conduct towards society at large. We vehemently adhere to internationally recognized human rights for workers like,

- Prohibition of Child and Forced Labour
- Appropriate & lawful Wages, Benefits and Working Hours
- Healthy and Safe work environment
- Harassment free and Non-Discriminating work place

R.U.C.H.A values has pivotal role in steering our business towards Environmental and Social sustainability. We condemn any violation of human rights and environmental protection, also on the part of all our stakeholders. We decisively support efforts for overall Community progress through Education & Skill development.

WORK ETHICS

RUCHA's emphasis on adherence to good Corporate Governance practices and managing its affairs in a fair, honest, ethical, transparent and legal manner is an integral part of the philosophy of the group.

ANTI-BRIBERY AND ANTI-CORRUPTION

This reflects RUCHA's commitment to a zero tolerance approach to acts of Bribery and corruption in the business practices and principles of behaviour.

These norms apply to all employees of the Company, representatives, agents, partners, or anyone else doing business in the name of or with the Company, including the suppliers, contractors, subcontractors & service providers.

In furtherance to its philosophy, the Company formulates its Anti-Bribery and Anti-Corruption Policy to ensure that no employee of the Company indulges in and associates with any act of bribery, extortion or corruption with any person for or on behalf of the Company.

Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for the Company or another party.

No bribes of any sort shall be paid or accepted from customers, suppliers, politicians, government / public official, public advisors or representatives, private person or Company for or on behalf of the Company for or in respect of any business or official matters or transactions of the Company.

The Company has a zero-tolerance approach to acts of bribery and corruption, by employees or anyone acting on behalf of the Company. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

These norms do not prohibit the practices of providing any customary gifts in a particular market, provided such gifts are appropriate and of reasonable nature in comparison to the general market practice and needs to be regularly reported to reporting manager and HCM

When we make a gift to a customer, a government official or any third party, we should keep the following in mind:

- It is not done to obtain or retain business or gain an improper advantage in business
- It is lawful under the laws of the country where the gift is being given and permitted under the policies of the client
- It constitutes a bona fide promotion or goodwill expenditure
- It is not in the form of cash;
- The gift is of nominal value (on an individual and aggregate basis);
- In any event, you must comply with our Anti Bribery & Anti-Corruption Policy

Accepting Gifts: The same principles apply if a customer or supplier wishes to give us a gift or any other token of their appreciation.

Reach out to the MD Office or Head HCM to understand the Process or Compliance we need to follow by writing to mdoffice@ruchagroup.com.

WHISTLE-BLOWER PROTECTION

The intention behind drawing up whistle-blower protection is to foster an ethical and safe environment in the organization by making “Whistle Blower” *[someone who makes a disclosure under this Policy]* confident about raising a concern [i.e. making disclosure] about illegal acts, violations of the code of conduct and unethical act committed by any company official.

It neither releases employees from their duty of confidentiality expected in their work nor is it a tool for taking up a grievance about a personal situation.

Whistle Blower COC doesn't just concern about organization's internal operations but applies to a wider spectrum of stakeholders organization deals with.

All disclosure has to be addressed to: MD Office, Rucha Engineers Pvt. Ltd.,
L-23, Waluj MIDC, Aurangabad-431136
mdoffice@ruchagroup.com.

CONFLICT OF INTEREST

When the interests or benefits of one person conflict with the interests or benefits of the Company

We must avoid situations involving an actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised. Conflicts of interest also occur when we or our family members receive improper personal benefits, or preferential treatment as a result of our position, or the position of a family member, in the Company.

Remember that such situations might impact our judgment or responsibilities towards our Company and our stakeholders and customers.

'Conflict of Interest' issue arises which is not just limited to the following situations

Outside Employment: If you take part in any activity that enhances or supports a competitor's position or accepts simultaneous employment with any other company or a business entity, it is considered outside employment and a conflict of interest.

Working with Family and Friends: To avoid conflicts of interest and any appearance of favouritism, ensure that you do not work directly for, supervise or make employment decisions about a family member.

Related Party Transaction: You should also avoid conducting Company business with a relative, or with a business in which a relative is associated in any significant role.

Relationship at work: **Personal intimate** involvement with a competitor, supplier, or another employee of the Company might affect your ability to exercise good judgment on behalf of the Company.

Outside Directorships: It is a conflict of interest for employees or directors to serve as a director of any company that competes with the Company.

Outside Investment: You should not have a financial interest, including through a relative, in any organization if that interest would give or appear to give you a conflict of interest with the Company.

Since the situations for other conflicts of interest are wide and many, it would be impractical to attempt to list all possible situations. If a proposed transaction or situation raises any questions or doubts, you should raise it to Head HCM.

WRONG REPRESENTATION

The individual employee has an obligation to each other and to the Company to comply with RUCHA's values. Wrong representation in any form including but not limited to,

- Forged or incorrect documents or information during Employment application
- Individual/Functional/Departmental or Company's performance
- Falsified reporting and representing company to any government agency or outside agency or consultant.
- Unattainable, Unethical or Unauthorized commitments to supplier or service Provider or customer.
- Claiming fabricated expense of any type.

Are not ethical and will attract appropriate punitive actions

WORK-PLACE CONFIDENTIALITY

As a part of the organization, every person working with RUCHA has an inherent responsibility towards protecting company assets in any form so as to ensure daily operation and competitive advantage are safeguarded all the time.

COMPANY CONFIDENTIAL INFORMATION:

For the Company, its confidential information is a valuable asset and every director, employee and agent of the Company must protect it. Confidential information includes all non-public information (regardless of its source) that might be of use to the Company's competitors or harmful to the Company if disclosed.

We must take care that all confidential information is used for Company business purposes only. Upon joining RUCHA, all employees are required to sign Confidentiality and Nondisclosure Agreement which details their confidentiality obligations to the Company.

As employees, we have access to significant amounts of company information that may not be available to the public, and we should preserve the confidentiality of information obtained in the Company's service.

Information of a confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

Unless the Company has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, we are prohibited from disclosing confidential Company information.

Confidential or proprietary information about clients, our organization, or other parties, which has been obtained through employment or affiliation with RUCHA, may not be used for personal advantage or for the benefit of third parties. This responsibility includes the safeguarding, securing and proper disposal of confidential information and extends to confidential information of third parties.

When we receive information as part of our job, we should not trade with it for our personal benefit. Neither should we pass on the information to our friends and family members or indirectly compete with the Company.

Information obtained as part of your job should not be taken advantage of, even after you leave the organization.

COMPANY INTELLECTUAL PROPERTY:

The intellectual property (IP) of the Company must be protected as a vital business asset. IP portfolio includes copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands and know-how.

It is important to ensure that to the extent permitted by law, the rights to all IP created using the Company's time and expense that are within the scope of our duties are assigned to and are the property of the Company.

PROTECTING COMPANY ASSETS:

The use of RUCHA assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited. Our information technology, intellectual property, facilities, equipment, machines, software and cash may be used for business purposes only and in accordance with applicable policies.

The use of any RUCHA resources for personal or political activities is prohibited. Computer hardware, software, data, and facilities are valuable resources that needs to be protected from potential destruction, theft, or misuse.

Copyrighted materials (e.g., books, music, software, and magazines) should not be reproduced, distributed, or altered without permission of the copyright owner or an authorized agent.

Software used in connection with the business of RUCHA should be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement and may be grounds for disciplinary action.

ADMINISTRATING THE CODE

The matters covered in this COC is of the utmost importance to the Company and all its stakeholders. This COC is essential to the Company's ability to conduct its business in accordance with its stated values.

We expect all of our directors, officers, employees and third-party agents to adhere to these rules in carrying out their duties for the Company. We take violations of this Code, Company policies and applicable laws seriously.

We strive for consistency and fairness in actions against for COC violations. Wherever appropriate, the Company takes prompt corrective action up to and including termination of employment.

Disciplinary action may include verbal or written warnings; suspension with or without pay or for the most serious offences or repeated misconducts, termination of employment.

Any disciplinary action depends on the nature, severity and frequency of the violation. It may vary depending upon local law. Please understand that those who violate the laws or regulations mentioned in the COC could expose themselves and the Company to substantial civil damages and criminal penalties.

ANNEXURE

What is covered under Whistle Blower Policy?

Malpractices and events which have taken place / suspected to take place involving:

1. Abuse of authority
2. Breach of contract
3. Negligence causing substantial and specific danger to public health and safety
4. Manipulation of company data/records
5. Financial irregularities, including fraud, or suspected fraud
6. Criminal offence
7. Perforation of confidential / propriety information
8. Deliberate violation of law / regulation
9. Wastage / misappropriation of company funds / assets
10. Breach of employee Code of Conduct or Rules or any behaviour against Company's Value System
11. Any other unethical, biased, favoured, imprudent event
12. Any damage to the environment or risk to the health or safety of people
13. Any violation of laws and regulations including those which pertain to deviation from accepted standards of accounting and internal control.

[Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues]



RUCHA ENGINEERS PVT. LTD.

K249, MIDC WALUJ, AURANGABAD

MAHARASHTRA, INDIA 431136

PHONE NO: +91 240 255 3118

EMAIL ID: repl@ruchagroup.com