

krtrimalQ Code of Conduct Policy PHILOSOPHY

krtrimalQ articulates the values and principles which govern the way its employees are expected to conduct themselves.

This Code of Conduct (CoC) policy clearly defines the values, ethics and business principles and serves as a guide to each employee and clarifies what is expected of him or her.

ROLE OF THE EMPLOYEES

- Read and understand CoC.
- Ensure personal and organizational compliance with the CoC.
- When in doubt about application of CoC check with the Manager.
- Promptly report any actual or possible violation of CoC to the Manager and HR.

1. DATA MAINTENANCE AND RECORDS

Any willful material misrepresentation of and/or misinformation of any data and/or reports by an employee shall be regarded as a violation of the Code. Such a violation would invite stringent action including appropriate civil or criminal action under relevant laws.

2. EQUAL OPPPORTUNITIES EMPLOYER

krtrimalQ provides equal opportunities to all its employees without regard to their race, caste, religion, colour, ancestry, marital status, gender, age, nationality, disability, and veteran status. Employees of the company shall be treated with dignity and in accordance with the policy to maintain a work environment free of sexual harassment, whether physical, verbal or psychological. The policies and practices shall be administered in a manner that would ensure that in all matters, equal opportunity is provided to those eligible and the decisions are based on merit.

3. GIFTS AND DONATIONS

Employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations, or comparable benefits which are intended to or perceived to obtain business, personal or any other favors for the conduct of its business. However, employees may accept calendars and book diaries.

4. CONFLICT OF INTEREST

Employees shall not engage in any business, relationship or any other activity (e.g. Borrowing money, using any facility etc.) which might detrimentally conflict with the interest of his Company or Group companies.

A conflict of interest, actual or potential, may arise, directly or indirectly, where

a. an employee engages in a business, relationship, or activity with anyone who is party to a transaction with his Company,



- b. An employee is in a position to derive a personal benefit or a benefit to any of his relatives by making or influencing decisions relating to any transaction,
- c. An independent judgment of the Company's best interest cannot be exercised and
- d. Any dealings with a subordinate or a person at a level lower than the employee himself.

It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, may have in a company or firm which is a supplier, customer, employee, distributor of or has other business dealings with his Company.

If an employee fails to make a disclosure as required herein and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management would take a serious view of the matter and consider suitable disciplinary action against the employee.

5. ETHICAL CONDUCT

Employees of the Company shall deal on behalf of the Company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties. Every employee shall be responsible for the implementation of and compliance with the Code in his professional environment.

6. REGULATORY COMPLIANCE

Employees shall, in their business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which he operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the Code then the standards of the Code shall prevail.

7. PUBLIC REPRESENTATION OF THE COMPANY AND THE GROUP

In any communication with agencies such as the media, the financial community, and other stakeholders, krtrimalQ shall be represented only by specifically authorized directors and employees. It will be the sole responsibility of these authorized representatives to disclose information on the Company.

8. CONCURRENT EMPLOYMENT

Employees shall not, without the prior approval of the Managing Director of the Company, accept employment or any other position of responsibility (such as a consultant or a director) with any other company, nor provide "free-lance" services to anyone.

9. <u>SECURITIES TRANSACTION AND THEIR CONFIDENTIAL INFORMATION</u>

Employees and their immediate family shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the Company which is not in the public domain and thus constitutes insider information.

10. PERSONAL WORK WHILE ON TOUR OR TOURING WITH FAMILY MEMBERS

Employees are normally not expected to do any personal work while on tour. Also when on



business tours no family member can accompany the employee.

11. POLITICAL NON-ALIGNMENT

No employee shall offer or give any company funds or property as donations, directly or indirectly, to any specific political party, candidate or campaign.

12. VIOLENCE

In krtrimalQ, the philosophy that violence has no place in the workplace and that the prevention of potential workplace violence is a responsibility shared by all employees.

13. GAMBLING/SMOKING/ALCOHOL/DRUGS

Keeping in mind the safety of the office premises and comfort of colleagues, employees must abstain from smoking in office premises. Consumption of alcoholic beverages or drugs and /or any form of gambling like playing cards or betting pools inside company premises are strictly prohibited. Employees found to have violated these policies will be subjected to appropriate disciplinary action.

14. EMAIL USAGE

The following guidelines on electronic mail usage must be followed:

The company email service should only be used for business communication purpose and usage of email service for any means of entertainment through graphic images, jokes, etc. is not allowed. To control the size and manageability of the mailbox, continuously delete large messages and messages with attachment immediately upon reading them. For important and relevant business mail messages, create the corresponding archive files and store it on the local desktop system.

The email service should not be used for Chain letters, junk mail, spamming, sending any unlawful, harassing, libelous, abusive, threatening, harmful, vulgar, obscene or otherwise objectionable material of any kind or nature.

Any material that encourages conduct that could constitute a criminal offense, give rise to civil liability, or otherwise violate any applicable law or regulation.

15. REPORTING CONCERNS

Every employee shall promptly report to the management any actual or possible violation of the Code or an event he becomes aware of that could affect the business or reputation of the company.

16. CONFIDENTIALITY AND PROTECTION OF COMPANY INFORMATION:

One of the company's most valuable assets is its business information. Failure to adequately protect this information could result in loss and could place the company at a competitive disadvantage.

Employees must not, during the term of their employment or thereafter, use for their own



purposes, retain on their personal premises (other than the normal course of performing their duties as required by the employee's job responsibilities) or disclose to any other person, any confidential or proprietary information including privileged information, trade secrets, or any other information acquired during and as a result of their employment with the company. Employees are responsible and accountable for the confidentiality and protection of business information entrusted to them. Documents containing sensitive information should be handled carefully during working hours and must be properly secured at the end of the day. Particular attention must be given to securing the information stored on the computer system. To prevent loss of unauthorized access of information stored on the computer system, employees must maintain the secrecy of their password.

Agreement to code of conduct

I acknowledge, confirm, and agree to the following:

- 1. I have read the code of conduct and understand its provisions, as applicable to me.
- 2. I confirm that I have not violated any provisions of the code, and
- 3. I agree to continue to abide by the provisions of the code.

Date 25 June 2025
Designation Senior AI Engineer

Signature

Full Name Rohit Bohra