



Code of Conduct Policy		
Policy No.: C-1	Revision No.: 04	Last Revision Date: 01-03-2023
Policy Category: Compliance		Date of Issue: 01-01-2026

A) Background and Purpose:

Every organization believes in certain values and principles and expects its employees to demonstrate them in behavior at all points in time. These principles in the form of 'Code of Conduct' are meant to govern the way the organization functions.

The Company acknowledges the uniqueness that each individual brings to the workplace, however, it expects uniformity in the manner in which its employees will represent the organization to all external stakeholders.

The Company is committed to ensure that its business is conducted, in all respects and all the times, according to rigorous ethical, professional and legal standards, which prevail from time to time, in the same industrial sector in which Company conducts its normal business. The Company is also committed to create a workplace, at all of its working locations, that, all the times, is free from harassment and discrimination, where co-workers are respected, and provided an appropriate environment so as to encourage good performance and conduct.

The Code of Conduct has been put in place with this very intent of defining acceptable and unacceptable behaviors in the context of work as well as clarity on consequence in case of violation, which will ensure that we give a consistent experience of the essence of 'Clean Science and Technology Limited' to all internal and external stakeholders.

The circumstances of conducts as set out below in this Policy, although not exhaustive, are intended to cover those situations, which are most likely perceived to be encountered by employees. In case any employee encounters any circumstances, which is not covered hereunder or in case of any doubt, employees should seek guidance from the Reporting Manager/ Reviewing Manager and/or from the Human Resource Department and act accordingly.

Employees are expected to be aware of and deeply understand this Code of Conduct and abide by the same in letter and spirit.

B) Objectives:

1. Provide clarity on themes relating to ethics and conduct of business which are important to the Company around which the code has been defined
2. Define acceptable and unacceptable behaviors under each of the themes mentioned in the policy
3. Define consequence of violation of the code

C) Scope:

This code shall be applicable to all employees on the permanent rolls of the Company, whether full time or part time and includes Probationers. It shall also apply to those who associate / engage with



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the company as Trainees, Fixed Term Contract resources, Interns, Associates, Retainers or Consultants. The Company further extends this code to its vendors partners also. If a business location or region has policies, practices, laws or regulations that require more than what is stated in this Policy, then the employees must follow this policy as a minimum and comply with such policies, practices, laws, or regulations in that particular region/ country; Business units and locations are responsible for ensuring that their location specific policies and practices are consistent and in compliance with this Policy.

D) Core Principles under this Code:

D-1. Professionalism

The personal and professional behavior of employees shall conform to the standards expected of persons in their positions, which includes:

- a. A commitment to and adherence to professional standards in their work and in their interactions with other employees of the Company;
- b. A commitment to maintaining the highest standards of integrity and honesty in their work;
- c. An adherence to ethical and legal standards to be maintained in business;
- d. A responsibility to support the Company in its efforts to create an open and mutually supportive environment;
- e. A responsibility to share information and give willing assistance in furthering the goals and objectives of the Company; and
- f. A responsibility to ensure that there is no misrepresentation of facts. Wherever a misunderstanding is thought to have taken place through unclear communications, this should be corrected promptly.

D-2. Reporting matters of concern:

The Company has put in place a set of policies and rules for maintaining discipline and ensuring order in its operations. Should you notice / observe any violation of any of the policies and rules, the company expects you to speak up and report the matter promptly to any of the following:

- a. Your HR department
- b. Your Reporting Manager and / or Head of the Department
- c. The Directors

The Company shall conduct an independent inquiry into all reported matters and conclude based purely on facts and data and initiate appropriate actions for ensuring that interest of the organization is protected.

The Company trusts that employees will report matters that are true and indeed against the interest of the company and not use this mechanism for settling personal grudges or scores with other colleagues / employees. The Company shall not tolerate retaliation against any employee who reports



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violation / suspected misconduct / inappropriate action in good faith. No such employee shall face any negative consequence.

Employees shall participate and fully co-operate by providing all information / data that they possess or are aware of during investigations / inquiries of reported matters.

Further, should the employee come to know of any law suit / litigation / any media release mentioning the Company, the same shall be reported to the HR department and Directors immediately.

Employees shall exercise restraint and great care while discussing matters relating to litigations in public places or others whether connected or not connected to the Company, and shall not reveal information that has not been officially circulated by the Management. In fact employees shall avoid discussions relating to matters that are not officially communicated to any external parties, including family and friends.

D-3. Conducting honest and ethical business dealings:

Employees shall be honest and ethical at all times in their business dealings with all stakeholders – customers, vendors, partners, associates and its employees.

Anti-Bribery, Anti-Corruption:

a. Prohibition of Bribery :

Bribery in any form, including cash, gifts, favors, or any other benefit, is strictly prohibited. Employees must neither offer nor request bribes for obtaining business, appointing vendors, or providing employment, whether directly or indirectly.

b. Ethical and Transparent Business Practices :

All employees must conduct business in a fair and transparent manner and ensure that all decisions related to customers, vendors, and employment are made based on merit and company policies, without any corrupt or unethical practices.

c. Compliance with Authorized Contracts :

Employees must enter into only legally valid contracts using company-approved templates reviewed by the Legal team and must act within the authority defined in the Company's Schedule of Authority.

d. No Unauthorized or Side Agreements :

Employees must not make any side agreements or commitments—verbal, written, or through email—that are not part of the official contract and its annexures. Any communication that may



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create legal or commercial obligations for the Company must be routed through and approved by the Legal team.

D-4. Conflict of interest:

The Company expects its Employees to act in the Company's interest at all times. Each employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company.

Conflict of interest means a situation in which the employee or a family member or a person known closely to the employee has professional or personal interest that could affect the employee's objectivity in making decisions as an CSTL employee.

Employees are advised not to engage in any other business, commercial or investment activity that may conflict with their ability to perform their duties to the Company. Employees must also not engage in any other activity (cultural, political, recreational, social) which could reasonably conflict with the Company's interests and interfere with the performance of their duties.

Employees must not use any Company property, information or position, or opportunities arising from these for personal gains or to compete with or to tarnish the image of the Company. Employees should not engage in any business activity, which could be detrimental to, or in competition with, the Company's any business activities.

All employees must avoid situations in which their personal interest could conflict with the interest of the Company. If, under any circumstance, employees' personal interests' conflict with those of the Company's, in all such cases the employee must seek advice from his or her Reporting/ Reviewing Manager or from Senior Management. For avoidance of doubt, mere financial portfolio investments shall not be considered as activities that conflict with the business of the Company.

Some of the conflict of interest situations that an employee is expected to be aware of are as follows:

- Promptly inform the Management if any of the family members are employed or engaged by a direct competitor of the Company
- Promptly inform the Management if any of the team members who report to them are in family relation, including distant relatives.
- Not undertake any assignments with a competitor or participate in any social events on invitation by a competitor while in the employment of / while being associated with the Company.
- Not undertake any assignments / participate in any social events with existing or potential customers and / or vendors / partners, other than that which is officially permitted, whether for consideration (cash / kind / obligation in any form) or not.
- Not misuse power and authority vested by the Company in the employee for deriving personal gains and benefits.



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- f. Not influence / pressurize / coerce any other person in the context of the Company, whether internal or external, to take decisions that will give the employee undue advantage over others in any matter.
- g. In the context of Consultants / Retainers, inform the Directors promptly if they undertake any assignment with a direct competitor of the Company or if any of their relative is hired by the Company with/without their knowledge, etc.

The Company looks at issues of conflict of interest very seriously and shall initiate appropriate disciplinary action against employees who are found to have conflict of interest with the Company.

D-5. Integrity of Financial and other reporting:

Employees shall, at all times, provide facts and figures to the Management that are authentic and true.

Management and other interested parties must have complete and accurate financial information in order to make informed decisions. Many employees participate in accounting processes that directly impact the integrity of external financial statements and internal management reports. All such employees have a responsibility to ensure that all transactions are recorded in Company's accounts accurately and promptly and they must immediately report any known inaccuracies.

No data provided shall be untrue, manipulated, fudged or misleading. Employee shall take care to verify information being provided by them is from a trusted source and that it is indeed authentic. Data shall be provided in given templates / formats and within the agreed timelines.

The Company believes in being transparent and honest with all its stakeholders and hence shall disclose all information as is required under any statute / law to relevant stakeholders from time to time.

Employees shall maintain all records in hard copy format or electronic format, as is required, for making the same available for internal / external audits, meetings, or producing the same for management information. Employees shall be wholly and completely responsible for ensuring confidentiality of the records and data in their custody and shall take utmost care to ensure that the same.

D-6. Confidentiality and Non-disclosure:

Being employed with the Company, employees have access to confidential information about the Company and / or its affiliates. Company enters into Non-Disclosure Agreements with its customers and other third parties, as a business requirement, hence maintaining confidentiality about all data / information relating to its products, pricing, technology and customers is extremely important. Employees shall abide by this while in employment as well as after they are relieved from the services of the organization.



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Information obtained, developed or produced by the Company and its employees, information supplied by outside consultants or vendors for the benefit of the Company and / or information about customers of the Company is confidential. This information shall not be disclosed to anyone outside the Company including friends, family, relatives, business or social acquaintances, customers, suppliers or others.

Discussion on confidential matters with other employees also shall not be done unless such information is required to be shared. Information with other employees shall be shared on a 'need to know' basis only.

Confidential information shall include but not be limited to:

- a. All notes, notebooks, papers, memoranda, drawings, sketches, diagrams, formulae, designs, books, letters, all technical information concerning the business and activities of the company, lists, instructions
- b. Confidential information pertaining through designs, formulae, processes, specifications or manufacturing details or material requirements, material used or of any instruments, equipment's, research and developmental activities, all kinds of services rendered by the company, products or articles or things which this Company or any of its associate companies or firm or concern may have undertaken to experiment in or to manufacture, fabricate, design of process and whether the same is actually manufactured, or communicating any information regarding formulae, specification technical or patent information or "know-how" or the use of any processes, material, instruments, tools or other requirements of the manufacture of the various and other things manufactured, fabricated or processed by the Company nor any of the secrets or knowledge or cost sheets or instructions or information regarding the plant facilities, machinery, equipment, organization product lines, or production flow as also the method and procedure of production or of the dealing of the Company including those of or pertaining to raw materials, finished products, goods-in-process, names of suppliers, names of purchasers or dealers as also cost sheets and all other papers and documents of whatsoever nature including electronic information of any kind

Employees shall abide by the 'Clean Desk Policy' and ensure that no official documents are left unattended on the work desk such that it may cause data loss hazard to the organization. Employees shall refrain from transferring any official company data to their personal mail ids or to any other devices such as pen drive, hard drive, etc. Violation of the Information Security Policy and protocols shall be viewed seriously and shall attract disciplinary action.

D-7. Gifts from vendors and parties related to the Company:

Accepting gifts, monetary or non-monetary, loans, entertainment or favours / preferential treatment from existing or potential customers, vendors, suppliers and / or third parties or associates related to the Company is strictly prohibited. Employees shall refrain from accepting gifts of value, directly or indirectly, if it may cause a conflict between personal interest and professional duties or create the



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appearance of such a conflict. Gifts and entertainment accepted from those doing or seeking business is prohibited.

It is unacceptable to directly or indirectly offer, pay, solicit or accept any kind of inducements or bribes.

Further, employees shall not offer gifts and favours nor entertain customers or any third parties on their own without consulting the Directors.

D-8. Protection of Company Property and Brand image:

All employees of the Company are responsible for protecting and taking reasonable steps to prevent the theft or misuse of, or damage to Company's assets, including all kinds of physical assets, movable, immovable and tangible property, corporate information and intellectual property such as inventions, copyrights, patents, trademarks and technology and intellectual property used in carrying out their responsibilities.

All employees shall treat the Company's property, tangible or intangible, with utmost care and respect. Employees shall ensure that no act on their part causes damage to property including but not limited to office space, furniture, resources provided for performing work such as laptop/desktop, documents / reading or reference material, etc.

Employees shall act responsibly at all times and ensure that the brand image and reputation of the Company is protected and not subjected to risk. Employees shall avoid discussing company work related matters in public places or with relatives and friends.

D-9. Alcohol consumption, drug and narcotic substance abuse:

Alcohol consumption and / or possession during working hours, whether at the Company's office, client location or while representing the Company for an official event is strictly prohibited. An official event shall be an event where the employee is representing the Company in official capacity other than informal events where alcohol is sponsored by the Company.

Employees shall not undertake any drug and / or narcotic substance abuse while in employment of the organization.

If employees notice any violation of on this front by their colleagues and co-workers, they shall immediately inform the HR team of the same.

D-10. Respect and dignity in the workplace:

The Company believes in treating all its stakeholders with utmost respect and dignity. Harassment and / or victimization of any person employed / related to the organization on grounds of religion, caste, creed, education, physical disability, marital status, age, gender or sexual orientation shall not be tolerated. Employees shall not make decisions relating to hiring, learning opportunities, appraisal



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ratings and promotion based on prejudices and biases for or against any individual. No discrimination shall be tolerated in any form.

In the course of business conduct of any employee, wherever harassment occurs to any such employee as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist such affected employee in terms of support and preventive action.

Employees shall respect the organization's hierarchy and authorities vested in position holders. No differential treatment shall be meted out to anyone on the grounds of doing a job that is perceived of lesser value as compared to others or purely by virtue of being at a lower position in the organization's hierarchy.

D-11. Whole Time and Attention:

All employees shall devote their time and their best efforts to promote the Company's business and may not without the prior written consent of the Company (and subject to any terms and conditions as may be imposed by the Company) engage or be interested in (whether directly or indirectly) in any other business, employment or vocation for monetary gain.

D-12. Fraud:

Fraud - or the act or intent to cheat, trick, steal, deceive, or lie - is both dishonest and, in most cases, criminal. Intentional acts of fraud shall call for strict disciplinary action, including dismissal and possible civil and/or criminal action against the concerned employee.

Some examples of fraud shall include but are not limited to:

- Submitting false expense reports;
- Forging or altering cheques;
- Altering Shift Reports, or any other Reports
- Misappropriating assets or misusing Company's property;
- Unauthorized handling or reporting of transactions;
- Inflating Production/sales numbers by shipping inventory known to be defective or non-conforming;
- Making any entry on Company records or financial statements that is not accurate and in accordance with proper accounting standards.

For more information, refer policy Fraud Risk Management Policy

D-13. Compliance with Laws and Agreements:

All employees shall conduct business in compliance with all applicable laws and regulations of the particular District, State or Country.



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Employees responsible for specific applicable compliances shall ensure that such compliances are done accurately and on time as per the specified timelines.

Employees shall maintain record / documentation of complied laws / statues / regulations and reproduce the same a and when required for audit / inspection / during visits of external authorities.

Employees shall ensure that agreements with external parties are carefully drafted so as to protect the interest of the Company and that all clauses are abided by thereby ensuring that no fine / penalty / liquidity damages are levied on the Company due to any kind of non-compliance.

D-14. Health, Safety and Environment:

All Employees shall comply with the Company's health, safety and environment policy and norms mentioned therein as communicated to them from time to time. Breaching of norms shall be considered to be a grave misconduct and shall attract strong disciplinary actions as per norm and laws.

Employees shall be alert and bring to the management's attention any workplace safety or health hazard.

Employees shall proactively participate in identifying safety and health related risks at the workplace and mitigating the same. Further, employees shall contribute and participate by giving suggestions and implementing approved ones for ensuring a safe and healthy workplace.

D-15. Money Laundering Prevention:

Money Laundering implies engaging, directly or indirectly, in a transaction that involves property that is the proceed of crime, or receiving, possessing, managing, investing, concealing, disguising, disposing of or bringing any property that is the proceeds of an act identified as a crime under the Prevention of Money Laundering Act, 2002 or any other applicable legislation.

The Company is committed to comply fully with all anti-money laundering and anti-terrorism laws throughout the world. It conducts business with reputable customers involved in legitimate business activities, with funds derived from legitimate sources. Each business is required to take reasonable steps to prevent and detect unacceptable and suspicious forms of payment.

The Company shall abide with the specific compliances as is tailor-made for the respective countries on compliance applicable in these jurisdictions.

D-16. Human Right:

i) Child Labour and Forced Labour:

The Company strictly prohibits child labour, forced labour, bonded labour, or any form of



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involuntary labour. We ensure adherence to minimum working age requirements prescribed by local regulations and prohibit employment of child labour. We respect the right of all workers to enter and leave employment voluntarily and do not engage in compulsory, forced, indentured or bonded labour. If any child labour found then we execute following process;

1. Immediate Action & Protection

- Stop work and remove the child from hazardous or prohibited tasks.
- Ensure the child's safety in a non-punitive environment.
- Verify the child's age using reliable documents.
- Assess immediate physical and mental needs; involve authorities or social services if required.

2. Investigation & Root Cause Analysis

- Conduct a sensitive interview to understand the child's situation.
- Identify reasons for child labour (poverty, debt, lack of school, social norms).
- Determine whether the child is directly employed or through suppliers/subcontractors.

3. Remediation & Education Support

- Provide financial support to replace lost family income.
- Facilitate school enrolment, bridging programs, or vocational training as needed.
- Require suppliers to contribute to education or remediation funds where applicable.

4. Monitoring & Ongoing Support

- Assign caseworkers or NGO partners to track school attendance and progress.
- Offer families alternative income opportunities to prevent recurrence.
- Implement or cooperate with Child Labour Monitoring Systems (CLMRS).

5. Preventive Measures

- Train suppliers on child labour laws and ethical practices.
- Conduct mandatory age verification during recruitment.
- Engage communities, schools, and NGOs to promote "Child Labour Free Zones."
- Ensure fair wages for adult workers to address root causes of child labour.

ii) Wages, Working Hours and Leave Benefits:

We believe that providing a flexible work culture help us to retain talent and keeps our employees motivated and engaged. Accordingly, we ensure the right to fair compensation

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and comply with all applicable laws related to payment of wages, working hours and overtime compensation.

iii) Recruitment:

We have implemented merit-based process in recruitment, compensation, training, and promotions. We do not support any fraudulent methods of recruitment.

iv) Data Privacy:

We respect the privacy of all our employees and business partners, by taking measures that are prescribed by law, to protect and secure personal data. We do not disclose anyone's personal, medical and financial information unless legally mandated.

v) Community engagement:

We are committed to engaging with local communities in a manner that respects the rights and dignity of all people in the geographies we operate in, We continue to support several community welfare, health and educational activities, essentially in communities surrounding the company's factories, by providing healthcare education, improvement of community infrastructure. Through our CSR initiatives we carry out various programmes beneficial to the local villages.

vi) Awareness programme and due diligence:

To educate employees Human Rights awareness programme/trainings will be conducted on a regular basis.

E) Consequence on violation of the Code of Conduct:

The Company places a high degree of trust on its employees and expects employees to abide by the Code of Conduct in its complete word and spirit. Non-observance of this Policy shall be construed as misconduct. Should any incident of violation occur, the company shall be forced to initiate an investigation and disciplinary action.

Should an employee be found guilty during the investigation, depending on the nature and severity of the violation, consequence of the violation may be as follows:



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1. Oral warning
2. Written warning
3. Suspension for a period of time without pay
4. Termination of service

F) Exceptions:

Any exceptions to the norms laid down in this Policy may be at the discretion of the Director or any appropriate authority delegated by them.

G) Accountability:

It is a condition of an appointment and/ or employment that all Employees must understand and adhere to the Company's Code of Conduct and at all times and abide by the standards, requirements and procedures laid down herein. They must:

- a. Commit to individual conduct in accordance with this Policy
- b. Observe both, the spirit and the letter of the law in their dealings on Company's behalf
- c. Recognize Company's responsibility to its customers, employees, those with whom Company does business, and to society. Assess priorities in the context of discharging these responsibilities appropriately on Company's behalf
- d. Conduct themselves as responsible members of society, giving due regard to health, safety, and environmental concerns, and human rights, in the operation of Company's business
- e. Report any suspected breach of the law or this Policy to the HR Personnel via email at factoryadmin@cleanscience.co.in or admin1@cleanscience.co.in or writing to who will protect those who report violations in good faith

H) Review and Amendment:

HR department shall be the custodian of this policy. The Company reserves the rights to change/ amend / add /delete/ modify this Policy in whole or in part, at any time without assigning any reason whatsoever. Employees acknowledge that they will not be personally advised of any such change/ amendment / addition /deletion/ modification. Employees are advised to check for any such change/ amendment / addition /deletion/ modification regularly.

The management at its sole discretion may amend and modify this official note from time to time and the same shall be binding on all employees.

I) Policy Revision:

The policy will be ordinarily revised once in 3 years. Or any amendments in the respective applicable laws, Market conditions, Business requirements of the company or any changes suggested by the management.



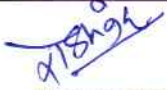
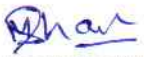
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Enclosures:

Annexure A: Declaration and Undertaking

Revision Summary:

Revision No.	Date of Revision	Summary
Date of Origin	02-04-2019	Date of Issue of Policy
Revision No. 1	15-06-2021	Change of company name and Code amendments
Revision No. 2	20-07-2022	Amendment in principle: Fraud & Human Rights
Revision No. 3	01-03-2023	Change in format
Revision No. 4	01-01-2026	D-3 : Added Anti Bribery, Anti-Corruption D-16 : Child Labour : Process

 Prepared by HR Department	 Reviewed by HR Head	 Approved by Managing Director
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Annexure A:

Declaration and Undertaking

I, _____ Employee No. _____, have read and understood the above-mentioned Code of Conduct of CSTL and agree to abide by the same in word and spirit.

I am aware that any action on my part that is not as per the mentioned clauses in this policy shall be construed as misconduct and may attract disciplinary action.

Name :

Department :

Signature :

Date :