



Revent Precision Engineering Limited
Ethical Standard and Code of Conduct Policy
Doc. No. RPEL/HR/COC/017
Effective Date 15th October 2024
Revision No. 000
Revision Date NA

Ethical Standards and Code of Conduct Policy

REVENT PRECISION ENGINEERING LIMITED

Prepared By:

Shantanu Kumar Singh
Sr. Manager-HR

Checked By:

Manish Jha
VP-HR

Document Owner:

Ravi Shankar Singh
CHRO

Approved By :

Prakash Hari Khose
CEO

1. PURPOSE

- Uphold the Highest Standards of Corporate Governance and Ethics
- Clearly Define Acceptable and Unacceptable Business Practices
- Foster a Culture of Accountability and Responsibility
- Encourage Continuous Ethical Improvement
- Promote a Safe, Inclusive, and Respectful Workplace
- Support Ethical Decision-Making at All Levels
- Align Corporate Conduct with Social Responsibility and Sustainability

2. Scope & Applicability

This Ethical Standard and Code of Conduct Policy governs all individuals connected to **Revent Precision Engineering Limited**, including employees, contractors, suppliers and business partners. Each is required to uphold the highest standards of integrity, respect, and accountability, ensuring ethical conduct and fostering a culture of trust in every interaction with the company.

3. Compliance with Laws and Regulations

We are dedicated to conducting our business in strict accordance with all relevant local, national, and international laws, regulations, and industry standards. We firmly believe that compliance is essential for maintaining trust, protecting our reputation, and ensuring the long-term success of our organization.

4. Integrity and Ethical Conduct

Employees must represent the Company with professionalism, integrity, and the highest ethical standards, ensuring fairness and transparency in all dealings with customers, suppliers, and regulators. Adherence to the Code of Conduct is mandatory. The Company enforces zero tolerance for violations, which may result in severe consequences, including termination.

- **Anti-Bribery and Anti-Corruption:** We prohibit all forms of bribery, corruption, extortion, and embezzlement. Employees must not engage in or tolerate any unethical business practices.
- **Conflicts of Interest:** An employee must avoid any business, relationship, or activity that could harm the Company's interests. A conflict of interest may occur if:
 - (a) The employee engages with someone involved in a transaction with the Company.

(b) The employee or their relatives stand to benefit personally from decisions related to any transaction.

- **Gift and Donation :** Employees are prohibited from accepting or offering illegal payments, gifts, or benefits to gain business advantages. As a general rule Gifts should never be requested or provided. However, Revent understands that in certain business scenarios, purely for social reasons (and not for obligatory or influencing reasons) there may be situations when accepting/offering gifts is unavoidable. Gifts on behalf of the Company, its employees and representatives to third parties in the form of cash is not allowed. However, non-cash gifts are allowed subject to limit of INR 5000 and approval from CEO.
- **Fair Competition:** The company is committed to fair competition and will not engage in any form of price-fixing, collusion, or manipulation of market conditions.

5. Concurrent Employment

An employee of the Company must obtain prior approval from the CHRO and Ethics Officer before accepting any employment or position of responsibility (e.g., as a consultant or director) with another organization, or before providing freelance services. For Whole-Time Directors, approval must be secured from the Company's Board of Directors, under the supervision of the CHRO and Ethics Office.

6. Human Rights and Labor Practices

We are unwavering in our commitment to fostering a workplace characterized by fairness, dignity and respect for all employees, in strict accordance with Indian human rights standards.

- **No Discrimination or Harassment:** We are dedicated to cultivating an inclusive environment where every employee can thrive, free from discrimination, harassment, or retaliation. We rigorously protect individual from unfair treatment based on race, gender, age, disability, sexual orientation or any other legally protected characteristic.
- **Fair Compensation :** We pledge to adhere to all applicable labor laws regarding wages and ensuring that every employee receives fair and equitable compensation for their contributions.
- **No Forced or Child Labor:** We strictly prohibit the use of forced labor, slavery, or child labor in any form.

7. Corporate Citizenship

The Company is dedicated to being a responsible corporate citizen, committed to enhancing community well-being and fostering self-reliance. Key initiatives include:

- Supporting community health, education, vocational training, and water management
- Organizing blood donation camps with approved agencies like the Red Cross
- Conducting tree plantation drives
- Maintaining local public utilities and parks
- Sponsoring key business and educational events

These activities are integral to our business strategy. We encourage employee volunteering and conduct regular social audits for continuous improvement.

8. Public representation of Company and the Group

The company prioritizes the information needs of the public and its stakeholders. All disclosures to public constituencies- including the media, financial community, employees, and shareholders—will be made solely by authorized representatives approved by the Managing Director. These representatives are responsible for communicating information about the company.

9. Protecting Company Assets

The Company's assets must be used solely for the authorized purpose of conducting its business and should not be misappropriated. This includes tangible assets such as equipment, machinery, systems, facilities, materials, and resources, as well as intangible assets such as proprietary information and relationships with customers and suppliers.

10. Confidentiality and Data Security

Employees must safeguard the company's confidential information, trade secrets, intellectual property, and any sensitive data related to clients, suppliers, or partners. Unauthorized disclosure of such information is prohibited. Confidentiality and data protection are critical to maintaining trust with our customers, partners, and employees.

- **Confidential Information:** Do not share sensitive company information, such as trade secrets, technical data, or business strategies, without proper authorization.
- **Data Privacy:** Comply with all data protection regulations and ensure that any personal or sensitive data collected is handled responsibly and securely.

11. Reporting and Accountability

Any violations of this Code of Conduct must be reported immediately to a supervisor, manager, or through the company's anonymous reporting mechanism. The company will investigate all reports and take appropriate action.

We encourage all employees to report any unethical behaviour, misconduct, or violations of this policy.

- **Whistleblower Protection:** Employees who report concerns in good faith will be protected from retaliation.
- **Reporting Channels:** Reports can be made through designated internal hotlines, management, or the Human Resources department.

12. Ethical Conduct and Disciplinary actions

Employees must represent the Company with professionalism, integrity, and the highest ethical standards, ensuring fairness and transparency in all dealings with customers, suppliers, and regulators. Adherence to the Code of Conduct is mandatory. The Company enforces zero tolerance for violations, which may result in severe consequences, including termination.

13. Ombudsman

Employees (whistleblowers) must promptly report any actual or potential violations of the Code or events that could harm the Company's reputation to the Ombudsman, authorized by the CEO. Whistleblower identities will remain confidential.

The Ombudsman will inform the CEO, conduct a thorough investigation, and submit findings to the CEO.

Acknowledgment

All employees are required to read and understand this Code of Conduct. Failure to comply with this policy may result in disciplinary action, including termination of employment or legal consequences.

The company has established additional policies that provide comprehensive guidelines for many of the terms referenced in the Code of Conduct. These include:

Policy Name	Document No.
Whistle Blower Policy	RMCL/HR/WB/018
Anti Bribery and Anti Corruption Policy	RMCL/HR/ABAC/019
Conflict of Interest Policy	RMCL/HR/COI/020
Equal Employment Opportunity Policy	RMCL/HR/EEO/021
Social Accountability Policy	RMCL/HR/SA/022
Prevention of Sexual Harassment at workplace	RMCL/HR/SA/023

Prepared By:



Shantanu Kumar Singh
Sr. Manager-HR

Checked By:



Manish Jha
VP-HR

Document Owner:



Ravi Shankar Singh
CHRO

Approved By :



Prakash Hari Khose
CEO



Acknowledgement of Receipt of Company Code of Conduct

I acknowledge that I have read RPEL's Code of Conduct and Policies & Procedures. As an RPEL employee, I commit to:

- Uphold the company's values.
- Adhere to all policies and standards.
- Consult the HR Department for any questions.

I will fulfil my job responsibilities and report any suspected violations. By signing below, I certify that I will:

1. Conduct myself in accordance with the Code.
2. Remain compliant with all policies and procedures.

<u>For Self</u>	<u>For Official Purpose</u>
Emp. Code : _____	Received and Acknowledged by:
Signature : _____	HR Rep Signature : _____
Name : _____	Name : _____
Date : _____	Date : _____