

CODE OF BUSINESS PRINCIPLES AND CONDUCT

Steelmet Industries (SI) has earned a reputation over a period of 35 years for conducting its business with integrity and with respect for the interests of those our activities can affect. This reputation is an asset, just as real as our people and products.

Our first priority is to be a successful business and that means investing for growth and balancing short-term and long-term interests. It also means caring about our consumers, employees and stakeholders, our business partners and the world in which we live.

To succeed requires the highest standards of behaviour from all of us. The general principles contained in this Code set out those standards.

We want this Code to be more than a collection of high-sounding statements. It must have practical value in our day-to-day business and each one of us must follow these principles in the spirit as well as the letter.

I. Code of Business Principles Standard of Conduct:

We conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our workers.

We shall similarly respect the legitimate interests of those with whom we have relationships.

II. Obeying the Law:

SI and its employees are required to comply with the laws and regulations of India.

III. Employees:

SI is committed to diversity in a working environment where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of our company.

We will recruit, employ and promote employees on the sole basis of the qualifications and merit.

We are committed to safe and healthy working conditions for all employees. We do not and will not use any form of forced, compulsory or child labour.

We are committed to working with employees to develop and enhance each individual's skills and capabilities.

We respect the dignity of the individual and the right of employees to freedom of association.

We will maintain good communications with employees.

IV. Customers:

SI is committed to providing quality products and services which consistently offer value in terms of price and quality, and which are perfect for their intended use. Products will be accurately and properly packed, tagged and communicated.

V. Gifts and Business Entertainment:

Under no circumstances the members of the management or the officers shall solicit, accept or agree to accept anything of value for the benefit of any person from anyone doing or seeking to do business with us that is perceived as intended, directly or indirectly, to influence any business decision.

Invitations from business partners, especially suppliers and customers may only be accepted if the occasion and the scope of the invitation are appropriate and if refusing the invitation is discourteous.

VI. Confidentiality:

The Company's confidential information is a valuable asset. The Company's confidential information includes product information, product plans and list of customers and employees and financial information.

All confidential information must be used for Company business purpose only. Every member must safeguard it. All officers must maintain the confidentiality of the information entrusted to their knowledge or its customers and any other information that comes to them about the Company, except when disclosure is authorized or legally required. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company if disclosed.

VII. Business Partners

SI is committed to establishing mutually beneficial relations with our suppliers, customers and business partners.

In our business dealings we expect our partners to adhere to business principles consistent with our own.

VIII. Community Involvement

SI strives to be a trusted company and, as an integral part of society, to fulfil our responsibilities to the societies and communities in which we operate.

IX. Public Activities:

SI is encouraged to promote and defend their legitimate business interests. SI will cooperate with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations that may affect legitimate business interests.

SI shall not support any political party nor participate to promote any particular political party interests.

X. The Environment:

SI is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business.

SI will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.

XI. Innovation:

In our scientific innovation to meet consumer needs we will respect the concerns of our consumers and of society. We will work on the basis of sound science, applying rigorous standards of product. We will also upgrade our quality, standards and procedures in line with the customer needs.

XIII. Competition:

SI believes in vigorous yet fair competition and supports the development of appropriate competition laws. SI and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

XIV. Conflicts of Interests:

All SI employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the company.

SI employees must not seek gain for themselves or others through misuse of their positions.

SI and all its directly or indirectly employed personnel pledge not to indulge in any morally unacceptable activity or condone such acts.

XVI. Compliance - Monitoring - Reporting

Compliance with these principles is an essential element in our business success. The SI Board is responsible for ensuring these principles are communicated to, and understood and observed by, all employees. Each employee is expected to be vigilant and report any deviation from the policy to his seniors.