

- **Code of Conduct Policy**

1 **Objective**

Unique Chains and Jewels Limited is committed to ensure that its business is conducted in an ethical and professional manner. The Company is also committed to create equal opportunity workplace free from any harassment and discrimination.

To achieve this goal our Employees are expected to:

- Adhere to this Policy in their professional as well as personal conduct
- Treat co-workers with respect, courtesy, honesty, and fairness
- Respect different values, beliefs, cultures, and religions
- Value the contribution of the people with whom they are working

This “Code of Conduct” Policy has been formulated in order to ensure that there is a common minimum standard of professional behavior. It provides the acceptable and non-acceptable set of behavior applicable to all employees across the company.

In accepting a position with the company, the employee becomes accountable for compliance with law and code of conduct policy.

2 **Coverage**

This Policy applies to all the employees of the Company. “Employee” includes all individuals on full-time or part-time employment with the Company, with permanent, probationary, trainee, temporary or contractual appointment.

3 **Clauses Covered Under the Policy**

3.1. Valuing our values

The company is governed by ten core values which help us to grow and develop. The values are customer happiness, integrity, relentlessness, speed, innovation, efficiency, excellence, empathy, nurturing and openness. These values define the conduct for all employees in our organization. It improves the Company’s ethical character upon which operational culture is built. All employees must adhere to our values in every action they take while performing their duty.

3.2 Integrity in Personal Conduct

The personal and professional behaviour of our Employees should conform to the standards of the Company, which includes:

- Usage of professional language while interacting with co-workers
- Maintaining highest standards of integrity and honesty at work
- Adhering to ethical and legal standards for the business
- Support the Company in its efforts to create an open and mutually supportive environment
- Contribute to achieve goals and objectives of the Company
- Responsibility to ensure that there is no misrepresentation of facts or data

3.3 Conflict of Interest

Our employee is expected to avoid situations in which his or her financial or personal interests are in conflict with the interests of the Company.

Accordingly, we expect our employees to act in the Company's interest at all times. 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 not use any Company's property, information or opportunities for personal gains. They should not engage in any business activity, which could be in competition with the Company's business activities, during the term of employment and for a period of 1 year after their separation from the Company. All employees must avoid situations in which their personal interest could conflict with the interest of the Company.

3.4 Protection and Use of Company Property

All Employees of the Company are responsible for protecting and taking reasonable steps to prevent theft, misuse or damage to Company's assets.

All Employees must use equipment, tools, materials and supplies only for Company's legitimate business interests and maintain Company's assets and resources efficiently and with due care and diligence.

3.5 Data Protection

All employees have a responsibility to ensure that any data or trade secrets of the Company are kept confidential.

Such confidential information includes, but is not limited to, the following examples:

Compensation data	Store and Company sales data
Computer and business processes	Marketing strategies
Customer lists	Technological data
Customer preferences	Pending projects and proposals
Financial information	Plans and Budgets
Company Policies and Processes	Product Information

Information of this nature should not be disclosed to unauthorized persons. Such information should not be carried out from the premises or shared with anyone. Unauthorized disclosure of any of the above is a serious offence and can result in immediate dismissal from employment. Therefore, all employees must ensure that they:

- Do not disclose any information with anyone without formal approval of concerned authority
- Do not access information or systems not directly relevant to each task
- Do not treat customer data carelessly
- Ensure all moveable inventory are kept safely when not in use
- Do not disclose information to unauthorized persons (including at business meetings, interviews, etc.)

3.6 Acceptance of Gifts and Other Benefits

Employees should not give or accept gifts or any other personal benefit or privilege that would in any way influence or appear to influence any business decision. Accepting money, gifts, loans or any other benefit or preferential treatment from any existing or potential customer, supplier or business associate of the Company, is strictly prohibited, except occasional gifts of modest value as part of customary business practice.

It is unacceptable to directly or indirectly offer, pay or accept bribes in cash or kind. Any attempted transaction of this nature should be immediately reported to the Reporting Manager/ Business Unit Head or the HR Department. The funds and resources of the Company shall not be used directly or indirectly for any such purpose.

3.7 Harassment

The Company is committed to provide a work environment that is free of inappropriate behaviour. All kinds and harassment on account of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender identity are strictly prohibited. Employees are responsible for supporting the Company in its endeavour to protect others from any form of harassment.

3.8 Alcohol, tobacco & Substance Abuse

The use or possession of alcohol, illegal drugs, and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited. However, possession of prescribed medication for medical treatment is permitted.

There may be company sponsored events where management approves the serving of alcoholic beverages. However, under all such cases, excessive drinking, intoxication and misbehavior is prohibited and will be dealt with severity. Any tobacco product is not allowed indoors.

3.9 Fraud

Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible civil criminal action against the concerned Employee.

Some examples of Fraud include:

- Submitting false expense reports
- Forging or altering cheques
- Misusing Company's property
- Unauthorized handling or reporting of transactions
- Cheque bounce/ Cancellation
- Making any entry on Company records or financial statements that is not accurate or not in accordance with proper accounting standards

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

3.10 Usage of Media

Employees should not make any unauthorized statements to the press or media. Employees are also not allowed to undertake any activity on social media (e.g., Facebook, Twitter, Slack, Instagram etc.) unless authorized or instructed to do so, in writing, by the Company. Employees are prohibited to post defamatory content, racially offensive statements or promotion of private ventures using the Company's name or logo. Employees must not insult the Company, its products, services or any employee even if specific names are not mentioned

4 Misconduct and Non-Conformance with The Policy

Non-observance of this Policy will be considered as misconduct that could warrant disciplinary action

which includes verbal or written warning, suspension with or without pay, loss or reduction of bonus, also, depending on the severity of violation, termination of employment. The disciplinary action will depend on the nature, severity & frequency of violation.

4.1 Redressal Process

An employee, who has been discriminated against, harassed or observes any violation to this Policy can file a written complaint.

The complaint can be made to anyone below;

4.2 Human Resources

4.3 The Reporting Manager

4.4 The Skip-level Manager/Directors

The first level investigation will be done by the respective Human Resource Manager. The identity of the employee reporting the incident will be kept confidential at all times. Any exceptions to this Policy may be at the discretion of the policy holder. All such investigation and recommendations shall be completed within 4 weeks of receiving the complaint.

Mr. Vaibhav Kamble
Manager – Human Resources
Prepared By

Mr. Parmesh Adarkar
Chief Financial Officer
Reviewed by

Mrs. Parvati Dilip
Company Secretary & Legal
Reviewed by