| Section No | Title | Page |
|---------------|---|------|
| 1. | Introduction | 3 |
| 2. | Our Values | 3 |
| 3. | Applicability | 3 |
| 4. | Our Responsibilities | 3 |
| 5. | Law of the Land | 4 |
| 6. | Ethical Conduct | 4 |
| 7. | Conflict of Interest | 4 |
| 8. | Concurrent Employment | 5 |
| 9. | Gifts and Donations | 5 |
| 10. | Financial Reporting and Record Keeping | 5 |
| 11. | Protecting Company Assets | 5 |
| 12. | Confidentiality and Insider Trading | 6 |
| 13. | Use of BCS Brand | 6 |
| 14. | Equal Opportunities Employer | 6 |
| 15. | Anti Harassment | 6 |
| 16. | Corporate Responsibility and Sustainability | 7 |
| 17. | Reporting | 7 |
| 18. | Acknowledgement | 8 |

Table of Contents

1. Introduction

BCS Switchgears Industries is a proprietorship company established in 1992 by Mr. B C Sharma (Proprietor). The company is engaged in manufacturing, erection, commissioning, servicing and supplies. The company is committed to establishing itself as the market leader and delivering quality products.

This Code of Conduct is a guide to the values and ideals of the company and the founder to govern the activities of the company and the actions of its employees in relation to business. This document reinforces our commitment to the stakeholders and society.

2. Our Values

- Honesty
- Integrity
- Transparency
- Accountability
- Respect

The company is committed to being recognised for its Integrity and Honesty while conducting its business. We are committed to maintaining the highest ethical standards in our business activities and operations. We believe the above values are the bedrock of our company and act as an ethical backbone in daily activities and decision-making.

We are committed to adhering to these values to surpass the client's expectations and continue to be a responsible business.

3. Applicability

This code is applicable to all the employees of BCS Switchgears Industries including its proprietor. The applicability of this code also extends to the people engaged on contract, retainer, consultant or any other such basis. The agents, dealers, distributors or supply chain partners are expected to carry out their business activities in a responsible, ethical and legal manner to avoid any impact on the reputation of BCS Switchgears Industries.

Failure to adhere to the Code could attract severe consequences, including termination of employment and recovery of damages due to this misconduct.

4. Our Responsibilities

The employees are responsible for upholding the values and ideals mentioned in the code in letter and spirit. To uphold the code the employees are expected

- 1. Understand the code and its provisions along with other policies, and procedures of the company
- 2. Always act with respect while maintaining integrity, honesty and transparency
- 3. Understand the legal requirements relating to our jobs and follow them at all times
- 4. Periodically, complete all the employee training to keep up to date with the latest standards

- 5. Report the concerns relating to this code or its violation in a timely manner
- 6. To exercise good judgment while making ethical decisions and seek assistance when needed

We are committed to making and maintaining safe working conditions for all our employees. We comply with all health and safety regulations. To uphold safety for all, as a shared responsibility we promise to look out for each other and prevent injuries. We also hold ourselves accountable for identifying the risks and reporting them to mitigate the loss.

5. Law of the Land

The employees of the company must comply with all the applicable government laws, regulations and policies. The employees should respect the law of the land, customs, traditions and culture of all the places where the company conducts its business activities.

The employees must align their conduct according to this code and the values laid herein. In case of violations of government laws, the employee is subject to civil and criminal actions as mentioned in the law. The employee shall also be subjected to disciplinary action by the Company.

6. Ethical Conduct

We are committed to upholding and maintaining the highest ethical standards. Our conduct at all times must be fair and respectful. The employees shall preserve the human rights of every individual and the community and shall strive to honour commitments.

The employees shall communicate with suppliers, distributors, agents, vendors and other business associates etc. the standards and ideals mentioned in this code.

7. Conflict of Interest

The employees and the proprietor(s) of the company shall at all times act in the best interest of the company and its stakeholders. We believe our business partners significantly contribute to the success of the company. It is therefore the shared responsibility of everyone to ensure that there is no conflict of interest with any of the business or personal associations.

The employees should make any business decisions based on values like integrity, honesty, commercial terms, pricing, quality, delivery and service. The employees should not conduct business with relatives or with businesses where close relatives are associated without prior approval from the approval of Proprietor. The employees should strive to avoid any actual and potential conflict of interest.

Actual or perceived conflicts of interest can include:

- 1. You or an immediate family member having a substantial, direct financial interest in a company that is a supplier, customer, competitor or contractor
- 2. Hiring a company owned by a family member or friend
- 3. Having a second job that interferes with your ability to do your job at the company
- 4. Using business opportunities identified for the Company for personal gain

8. Concurrent Employment

BCS employees are prohibited from accepting employment (including freelancing services) or any position of responsibility with any other company, with or without any remuneration. For any concurrent employment, the employee shall take written approval from the proprietor of the company.

9. Gifts and Donations

The company is committed to our values and have zero tolerance for any unethical or illegal activity that would raise doubts about our commitment and reputation. The company is committed to preventing corruption and bribery.

The company and its employees shall neither receive nor shall offer or make, directly or indirectly, any form of gifts, payments, illegal remuneration or benefits to any government official that are intended, or perceived to obtain uncompetitive favours for the conduct of its business. This includes felicitation payment.

Gifts of modest value (up to Rs. 1800) can be customarily offered after prior approval and full disclosure. We do not take receive or offer any gifts in cash or cash equivalents.

Any gift is to be only accepted at the office and no gift can be accepted at the employee's residence or outside company premises.

10. Financial Reporting and Record Keeping

All the employees and proprietor(s) of the company are expected to ensure the accuracy of financial records as per the law of the land and accounting standards. We believe in principles of transparency and accountability, it is therefore important to maintain the highest standards of accuracy and integrity while maintaining and retaining the records. All records must be complete, precise and maintained in a timely manner.

The company's internal accounting and audit procedures shall reflect, fairly and accurately, all of the company's business transactions and disposition of assets, and shall have internal controls to provide assurance to the company's proprietor that the transactions are accurate and legitimate.

Upon request of the auditors, government agencies or any other official and authorised personnel, all information shall be made accessible to them without any omissions of any company transactions from books and records. Any violation of this provision or standards laid in the code by any employee shall attract civil or criminal action as per relevant laws along with disciplinary action by the company.

11. Protecting Company Assets

All employees of the company understand that the use of company assets for any illegal, unethical or personal purposes is prohibited. Company assets include tangible (equipments, machinery, systems, facilities, people and other resources) and intangible assets (information technology,

confidential information, proprietary information and others). The assets of the company must be used judiciously and for business purposes only. BCS employees are responsible for effective control and appropriate use of all Company's resources entrusted to them in the official discharge of their duties.

Exception: For minor personal uses assets like computers or printers can be used by employees.

12. Confidentiality and Insider Trading

It is important in this age of technology, that confidential information is a valuable asset and must be protected by all employees and proprietor(s). Confidential information is all such information that is not readily available in the public domain. The company shall take measures to secure, preserve, safeguard and use discreetly, confidential information in the best interest of the Company. No information shall be shared with third parties except when required and authorised for business reasons.

Confidential information includes but is not limited to – client lists, vendor lists, trade secrets, client agreements, processes, financial information, material and development plans, pricing policies, and business policies. The employee shall not derive any benefit or counsel, or assist others to derive any benefit, from access to and possession of information about the company or group or its clients or suppliers that is not in the public domain and, whether or not constitutes unpublished, price-sensitive insider information. An employee of the company shall also respect and observe the confidentiality of information pertaining to other companies to strictly observe a practice of non-disclosure

13. Use of BCS Brand

The use of the BCS name shall be governed by manuals, codes and mutual agreements and understanding. No third party or joint venture shall use the BCS brand to further its interests, or otherwise, without specific written authorisation by BCS.

14. Equal Opportunities Employer

At the company, we are committed to providing a safe working space that is free of any form of harassment and discrimination. Our decisions for employment are made on the basis of merit and business needs. We shall provide all employees and qualified applicants an equal opportunity without any regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The company understand the importance of diversity and firmly believes in inclusion. We encourage the adoption of global best practices for all our activities.

All employees of the company are equally valued and respected for their contributions.

15. Anti Harassment

The company believes in making the working environment safe and inclusive for everyone. We adhere to the principles of human rights and dignity for all. We are committed to protecting our employees from any form of harassment (including physical, verbal, mental and emotional),

intimidation or abuse. We have zero tolerance for any form of harassment by or against our employees.

The employees for the effective functioning of the Company must abide by the principles of respect and dignity. It is the duty of employees to be vigilant and report in a timely manner any incidences of harassment to the authorities. The company shall take necessary actions including legal and disciplinary actions as per the set anti-harassment policies of the company.

16. Corporate Responsibility and Sustainability

The company is a responsible corporate and is committed to the cause of sustainability. We conduct activities in an environment-friendly and sustainable manner. The employees shall not only be in compliance with relevant laws and regulations but also strive to assist in the improvement of quality of life in communities and geographies in which it operates. We encourage our employees to volunteer and collaborate with community groups to lead by example.

17. Reporting

Every BCS employee shall promptly report to the management, and/ or third-party ethics helpline, when she/he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanour or act not in the company's interest. We are committed to anti-retaliation and will not tolerate any ill-treatment/harassment of an employee who has reported misconduct/violation in good faith.

Any BCS employee can choose to make a protected disclosure under this policy, providing for reporting to the chairperson of the audit committee or the board of directors or specified authority. Such a protected disclosure shall be forwarded when there is reasonable evidence to conclude that a violation is possible or has taken place.

Failure to comply with the standards laid in this code is a serious violation and is subject to disciplinary action including termination of the employment.

Ethics Helpline Details

Contact: Ieeshan Sharma

Email: ieeshansharma.3@gmail.com

Address: HD-281, Sector-135, Noida

ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING OF CODE OF CONDUCT

I have received and read the BCS Code of Conduct. I understand the standards and policies contained in the Code and understand that there may be additional policies or laws specific to my job. I agree to comply with the Code. If I have questions concerning the meaning or application of the Code, any Company policies, or the legal and regulatory requirements applicable to my job, I understand that I can consult the HR department or the finance department, or the Ethics Committee and that my questions or reports to these sources will be maintained in confidence

Employee Name:

Unit Name:

Signature

Date