



Voltamp Transformers Limited Code of Conduct

PREFACE:

As part of our efforts to deliver our Sustainability Vision, we at Voltamp Transformers Limited ('Voltamp') have established this Policy to demonstrate our commitment to embed sound governance, deliver transparency, tackle corruption, manage risks and provide value through strong governance and robust business ethics.

The Voltamp Codes of Conduct consist of rules and principles intended to assist officers and employees in making decisions and taking actions in accord with the Voltamp Identity. All officers and employees of Voltamp shall understand and follow the Codes of Conduct and act with sincerity and fairness in a highly ethical manner.

We aim to ensure that all our employees conduct themselves in accordance with the highest standards of honesty, integrity and fairness, exercising utmost good faith, judgement and due care in the performance of their duties. And to achieve this we have adapted below practice:

- Provide every employee with sufficient knowledge and understanding of Voltamp's business to enable them to ethically uphold the interests of our business and its stakeholders;
- Ensure our employees:
 - Only act within the authority conferred upon them;
 - Dedicate sufficient time and attention to the Voltamp's business to ensure the diligent performance of their duties;
 - Are provided with the means and opportunity to actively participate in the discussion and decision making in meetings or at appropriate forums;
 - Maintain the confidentiality of any information concerning Voltamp's business, its customers, suppliers, business partners, etc.

We also aim to ensure that we have in place the most effective systems to support our employees in delivering the highest standards of business ethics. And to achieve this we have adapted below practice:

- Establish a governance structure that promotes business conduct, that is ethical, transparent and accountable;
- Ensure that our systems and employees design, produce and make available goods and services that are safe, resource-efficient, create value, are competitively priced, easy to use and safe to dispose of, whilst minimising any adverse environmental or social impacts;
- Ensure we have an effective, confidential and accessible internal grievance system through which any instances where our strict approach to business ethics appear to have been compromised can be raised, investigated and addressed firmly and uncompromisingly.
- Ensure there are robust systems to protect from discrimination or disciplinary action any employee who makes a bona fide report to management (or, as appropriate, to the

competent public authorities) regarding a potential or actual infringement of our business ethics;

- Ensure we have an effective, confidential and accessible external grievance system through which any consumer concerns and feedback, any potential and actual conflicts of interest, any suspected incidents of bribery or corruption, etc. can be highlighted, investigated and addressed;
- Provide appropriate training to supervisory and managerial employees with regard to how to comply with our policies and systems for ensuring the highest standards of business ethics;
- Educate our employees about business ethics, what this term covers, and how, with our help, we can ensure they are able to deliver the highest standards to which we aspire;
- Establish monitoring and auditing activities, that will show how well we are doing in ensuring our standards for business ethics are being met, and report on our performance against these measures to our stakeholders.
- Though the company does not have any employee associations. However, the Company recognize the right to freedom of association and does not discourage collective bargaining.

We aim to promote the ethical conduct of business across all our suppliers and business partners.

And to achieve this we have adapted below practice:

- In selecting suppliers, thoroughly review the quality, reliability, delivery time, and price of the materials they provide as well as their business stability and technological capability. We will give due consideration to their adoption of social responsibility practices, including areas such as the abolition of unfair discrimination, the elimination of child labor and forced labor, and environmental conservation.
- Not accept any personal benefits from suppliers in procurement transactions.

We aim to do what we can to embed sound governance, deliver transparency, fair business activities and tackle corruption in businesses within our local communities and across India. And to achieve this we have adapted below practice:

- Ensure fair and open competition, observe the fundamental rules of trade, including domestic and overseas competition laws and regulations, and act in compliance with legislation and sound corporate ethics.
- Support local and national projects that aim to promote sound business ethics and tackle corruption;
- Strictly prohibit and will have no involvement in bribery and other corrupt business practices. Neither give or receive gifts nor extend or accept invitations to business entertainment beyond socially accepted limits, as we recognize that such practices can foster corruption. When working with political entities, build and maintain sound and transparent relationships.
- Not trade equity shares using undisclosed information regarding the Company, or customers that could affect the judgment of investors (insider information).

We will continue to be fully committed to our statutory and voluntary obligations relating to governance and business ethics. These include:

- National Guidelines on Responsible Business Conduct;
- All local and national statutory regulations relating to the governance and business ethics;

Relationship with Customers

- We will provide products and services that meet the needs and requirements of our customers, complying with relevant laws and standards and ensuring quality and safety by setting additional standards of our own where necessary.

- We will communicate with customers sincerely, address defects and customer complaints quickly and in good faith, and strive to determine causes in order to eliminate them and prevent recurrence.

Delivering Transparent Disclosure

We will ensure that we disclose fully and transparently, ensuring the validity of all financial and nonfinancial information, by following below practice:

- We will ensure to disclose at an appropriate frequency and in a manner best suited to our stakeholders, the following material information:
 - Our financial and operating results;
 - Major share ownership and voting rights, including the structure of the Group and intragroup relations;
 - Remuneration policy for members of the board and key executives;
 - Governance structures and policies, in particular, the content of any corporate governance code or policy and its implementation process;
 - The sustainability performance of our business;
- We will ensure the validity of the information that we disclose is confirmed through the use of auditing and verification services provided by reputable third parties.

Ensure Fair Competition

We will ensure that we do not engage in any anti-competitive practices, by following below practice:

- Ensure any and all of our representatives are fully trained to ensure they do not discuss or enter into any formal or informal agreements with any competitor about prices, or matters affecting price, production levels, etc.
- Co-operate fully and openly, if and when requested, with any investigating competition authorities.

Influencing Public Policy

We will ensure that, when we engage in the influencing of public and regulatory policy, we do so in a manner that is responsible and transparent, by following below practice:

- Ensure, to as great an extent as possible, that we undertake policy influence and advocacy through trade and industry chambers and associations, and other similar collective platforms;
- Ensure that our policy influence and advocacy positions promote sustainability, fair competition and respect for human rights.

Involvement in Local Political Activities

We aim to ensure that the Voltamp brand is protected from improper or unethical involvement in any local political activities, by following below practice:

- Ensure all site management abstain from any involvement in local political activities;
- Discourage the involvement of employees in any local political activities that could be deemed illegal, discriminatory, inappropriate or improper, and ensure all employees are aware of this requirement.

Meeting Our Financial Obligations

We will ensure that we contribute to public finances by timely and complete payment of all applicable taxes in accordance with the letter and spirit of the laws and regulations governing such payments, by following below practice:

- Provide to the relevant authorities with timely information that is relevant or required by law for the purposes of the correct determination of taxes;
- Encourage our employees to fulfil their own tax obligations in a full and timely manner.

Information Management and Communication

- We will properly manage and protect confidential information related to our business activities in compliance with domestic and international laws and regulations as well as our internal rules and policies.
- In order to maintain and expand our trusting relationship with the Voltamp's diverse stakeholders, we will disclose information openly and transparently, and respond to stakeholders responsibly through dialogue and other means of communication.

Securing Corporate Assets

We will use all our corporate assets only for business activities and other appropriate purposes, and manage them properly to protect their value.

Responsibilities of Employees

Employees shall pledge to comply with the Codes of Conduct. If they become aware of any noncompliant activity, they shall immediately report to their manager or via the internal reporting system.

Responsibilities of Top Management

Top managers shall take the initiative in complying with the Codes of Conduct and make their best efforts to conduct business based on corporate ethics and the law. In the event of violation of the Codes of Conduct, top managers shall swiftly take corrective measures and actions to prevent the recurrence of similar incidents, while at the same time strictly disciplining themselves as well as those involved in the violation.