

Document	STANDARD OPERATING POLICY		
Department	Human Resources.	Effective Date	01-January-2022
Document No.	JBCPL / HR / 062 / 2022	Valid Upto	31-December-2025
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Code of Conduct Policy

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1.	<p>Introduction:</p> <ul style="list-style-type: none"> – This Code of Conduct of J.B. Chemical & Pharmaceuticals Limited (‘The Company’ or ‘We’ or ‘JBCPL’) resonates our company’s commitment to ethical business conduct, applicable laws, bye-laws, regulations, international as well as domestic, and transparent corporate policies and procedures. – This Code of Conduct complies with legal and regulatory requirements under Regulation 17 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR). This code of conduct provides the guidelines for expected behaviour in line with organizational values.
2.	<p>Definitions:</p> <ul style="list-style-type: none"> – Employees – For the purpose of this Code, employees shall mean permanent, temporary, contractual employees, trainees, interns, and apprentice. – Workplace: For the purpose of this Code, workplace shall mean the physical premises, offices, factories, and other physical units of JBCPL in India as well as across the globe. The term workplace also includes virtual workplace such as virtual meetings and calls, formal and informal communication (textual, audio or audio-visual) among employees and/or between employee(s) and third-parties, and other such physical and non-physical places where the Company representative visits during normal business activity. – Third-party: For the purposes of this Code, ‘third-party’ shall mean agents, franchisees, intermediaries, vendors, suppliers, sub-contractors, resellers, contractors and agency staff, contract manufacturers, stockists, distributors, HCP, HCO and consultants with whom JBCPL may enter into agreement(s) for purchasing directly or indirectly materials and/or services.
3.	<p>Scope and Applicability:</p> <ul style="list-style-type: none"> – This Code of Conduct is applicable to all employees working at JBCPL either full-time or part-time, contractual, or permanent. Any Third-party operator engaged by the Company for business, transactional dealing or any other work would also be covered by this Code. – Any such third-party engaged by the Company for business purposes shall be made aware of this Code’s existence and contents and shall comply with the same. Any contractual arrangements entered by the Company for business purposes shall be in accordance with the contents of this Code.
4.	<p>Adherence: This Code of Conduct and all its clauses shall be always adhered to in letter and spirit by all employees of the Company.</p>

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5.	<p>Compliance with all laws and Policies:</p> <ul style="list-style-type: none"> – All employees shall strive to comply with all applicable laws, regulations, bye-laws, codes and company policies. – The company, its employees and third-parties engaged shall be compliant with all applicable laws, regulations, bye-laws and policies in force or agreed upon.
6.	<p>Observance of Ethical standards:</p> <p>All employees of the company shall maintain highest level of ethical standards in their day-to-day activities and decision-making roles.</p>
7.	<p>Prevention of Harassment at Workplace:</p> <ul style="list-style-type: none"> – Harassment of any nature will not be tolerated by the Company at any time. No employee shall endeavour to harass any colleague/ coworker/ subordinate/ peers etc. while performing their duties. In addition, JBCPL has a mechanism to redress PoSH complaints and has put in place the Internal committee. Any PoSH related incident shall be reported to the PoSH Internal Committee: posh@jbcpl.com – No employee shall engage in a behaviour which makes other employees uncomfortable and creates a hostile working environment. – Every employee shall conduct themselves in a manner wherein they treat others with dignity and respect. – Any action or attempt by any employee of our Company in deviation from above description as well as from the ‘Prevention of Sexual Harassment at Workplace Policy’ established by the Company shall be dealt with appropriate disciplinary action as deemed fit.
8.	<p>Workplace Ethics and Substance Abuse:</p> <ul style="list-style-type: none"> – Every employee at our Company’s premises shall not possess or consume alcohol, cigarette, tobacco or any other illicit substance while on the premises of the Company or during working hours whether working from home or from some other location virtually. – Any violation of the same, may lead to immediate termination from the employment and any third-party worker, client or visitor found intoxicated at Company premises may be asked to vacate the premises immediately without any prior notice.

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9. **Conflict of Interest:**

- A conflict of interest occurs when a possibility of an indirect or direct personal benefit influences the job roles, responsibilities, and duties of an employee.
- All employees shall disclose any conflict of interest (actual or probable) with the Company. Any conflict-of-interest situation shall be handled in a manner which is not detrimental to Company's business interests. For any queries, we can be reached at secretarial@jbcpl.com

The following are prohibited:

- Operating a business or accepting an employment or a position of responsibility outside work that impacts an employee's job duties and overall performance at JBCPL.
- Giving business or recommendations to close friends, family or acquaintances with a view of gaining direct or indirect personal benefits.
- Undertaking scientific drug tests of other companies in JBCPL's labs/facilities.
- Using resources of JBCPL for making payments, reservations, and bookings for a relative or an acquaintance.
- Having a financial interest in a competitor's, supplier's, distributor's or vendor's business other than as an investor in public listed companies.
- Making recommendations for suppliers or vendors who might be related to or associated with or giving preference to such associations without considering the qualifications, pre-requisites or specifications of the company.

10. **Anti-Bribery and Anti-Corruption:**

- JBCPL is strictly against corrupt practices such as bribery, forgery, money-laundering, and misreporting, to name a few. All employees of the Company shall adhere strictly to standards of ethically correct practices and not indulge in corruption or practice of bribery in any manner.
- Further, Political or Charitable contributions, Sponsorships, interaction with Health Care professionals and Health Care Organizations shall at all times be in accordance with the 'Anti-Corruption and Anti-Bribery Policy' established by the Company. For any queries, we can be reached at compliance@jbcpl.com

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11. **Gift and Hospitality:**

- Employees shall be vigilant while offering or receiving Gift and Hospitality at all times, with no intention of influencing decision-making. For any queries, we can be reached at compliance@jbcpl.com
- Any deviation by an employee or on behalf of an employee from above, shall be dealt with strictest disciplinary action.

The following shall be kept in mind while offering or receiving Gift and Hospitality:

- Do not make illegal payments, take favours, accept business courtesies or entertainment.
- Do not send gifts at the residence of representatives of Third Parties including Government Officials and HCPs. (Health Care Professionals)
- No cash, and cash equivalents (gift vouchers, shopping cards etc.) gold or silver accepted or given.
- Lavish or extravagant Gift or Hospitality like, expensive electronics, stay in recreational resorts etc. shall be avoided.
- Necessary approvals to be taken for any gift to be given with valid receipts.
- Airline travel or overnight accommodation; if it is to be accepted from or provided
- needs to be stated in the agreement with Third Party.
- All expense reimbursements must be supported with valid receipts of expenses and
- approvals must be accurately and completely recorded in the Company's books.
- Ensure that the recording of the expenditure associated with meals, lodging, travel or entertainment clearly reflects the true purpose of the expenditure.

12. **Insider Trading:**

- Insider trading refers to an insider who is trading in securities based on unpublished price sensitive information (UPSI). No employee, or persons in possession of privileged information (as defined under 2015 Regulations) shall resort to practices that will fall within the meaning of insider trading. As a commitment to our valued shareholders, we shall put adequate safety controls to ensure that the practice of insider trading within the Company shall be avoided.
- In accordance with Regulation 8 of SEBI (PIT) Regulations, 2015, our Company has put in place 'Code of Practices and Procedures for Disclosure of Unpublished Price Sensitive Information' and any disclosure of unpublished price sensitive information (UPSI) shall be in consonance with procedure laid out in the Code of Practices. For any queries, please reach at secretarial@jbcpl.com

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The following shall be kept in mind:

- Do not share confidential information.
- Do not share sensitive information.
- Do not share confidential information with family.
- Do not spread false information
- Know your company trading policies
- Stay updated about current trading laws
- Report to the relevant authority in case of any wrongdoing.

13. Reporting and Accounting Integrity:

- All employees shall ensure that disclosures made in financial reports are full, fair, accurate, timely and undisputed. This obligation extends to third-party financial and accounting executives, having been assigned the responsibility for preparation of such reports, including drafting, reviewing and signing or verifying the information contained therein.
- Employees should inform the Management, HR or Finance department if they learn that information in any filing or public communication were untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

14. Use of Company Assets & Information:

- Company assets, including time, material, equipment, and information, are provided for company business use only.
- In order to protect the interests of our fellow employees, company reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device. The company shall not tolerate the use of company's assets to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate in nature.
- All employees are expected to be proactive in reporting any unauthorized use of the Company's intellectual property namely copyrights, trademarks, patents, trade secrets, design rights, logos and brands. For any assistance regarding the same, the Legal Department of the Company may be contacted at the earliest.
- All employees shall protect confidential information from unauthorized use or release either in physical office space or through virtual mode of operation. Unauthorized disclosure of confidential information may harm our business, consumers and valued stakeholders; therefore, any such usage or disclosure will be a ground for termination from employment.

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15.	<p>Use of Social Media:</p> <ul style="list-style-type: none"> – Interactions on internet and public platforms can result in unintended and disastrous consequences which often lead to unwarranted and unnecessary complications, both professionally and personally. Employees of JBCPL shall conduct themselves morally and sensitively while projecting their views on social media and interacting with internal or external persons on public platforms. – All inquiries received for company through social media networks, blogs and other types of online content which generate press and media attention shall be addressed by an authorized spokesperson as appointed by JBCPL. – Employees shall refrain themselves from engaging in any online communication which could hamper company’s reputation at any time. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>The following shall be avoided at all times:</p> <ul style="list-style-type: none"> • Sharing proprietary and private information • Making derogatory comments about company, employers or their practices. • Spreading rumors. • Making derogatory comment on customers and competitor company. • Making religious or political comments </div>
16.	<p>Whistle-Blower Mechanism:</p> <ul style="list-style-type: none"> – Whistle Blower refers to an employee or any other stakeholder making a protected disclosure under the Policy. Any disclosures made under the framework of Whistle-Blower mechanism is kept anonymous and law mandates companies to take no arbitrary action against persons making bona fide disclosures. – As part of our commitment towards building a transparent professional environment, we have instituted a ‘Whistle-Blower Policy’ in line with SEBI (Listing Obligation and Disclosure Rights) Regulations 2015 and Companies Act 2013. For any queries, we can be reached at secretarial@jbcpl.com – All employees at JBCPL are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure. – No employee at JBCPL is permitted to engage in retaliation, retribution, or any form of harassment against another employee for reporting any concerns. Any retribution, retaliation, or harassment shall be met with firm disciplinary action.

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17.	<p>Publication: This Code has been duly approved by the Board of Directors of JBCPL after necessary deliberation. Any questions of interpretation or clarification regarding the Code and its provisions shall be dealt by an authorized person as appointed by the Board.</p>
18.	<p>Amendment: For any amendment to this Code or any of its provisions, approval of the Board of Directors of the Company is necessarily required.</p>
19.	<p>Consultation & Exception: The Code is applicable equally to all the persons mentioned in the Applicability clause. Any waiver from application of this Code to specific person shall be subject to approval from the Board of Directors of JBCPL.</p> <p>All the related policies are available on HRMS Portal: https://hrms.jbcpl.com/ Path - Login to Workline > Homepage > Knowledge Base > JBCPL Policies.</p>
20.	<p>General Guidelines: The management reserves the right to amend / change the above policy at any time as it deems fit, without giving any notice or intimation thereof.</p>