

HARIOM PIPE INDUSTRIES LIMITED

Code of Conduct on Ethics ,Transparency and Accountability

Hariom Pipe Industries Limited (referred to as "HPIL" or the "Company") is dedicated to establishing and upholding a workplace culture rooted in ethical behaviours, openness, and exemplary behaviour. This Code of Conduct (referred to as the "Code") establishes the framework for our behaviour within the Company, as well as our interactions with stakeholders, aligning with our commitment to uphold the utmost levels of business ethics and modesty.

The Code applies to all the Employees of the Company including Members of the Board, Senior Management Personnel (hereby collectively referred to as "Employees"). The principle enshrined in this Code are general in nature and lay down broad standards of Company's relentless endeavour to carry out business with highest ethical standard and also in accordance with various regulatory provisions including Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time).

The foundation of the Code rests upon the Company's core values encompassing Purposeful Entrepreneurship, Customer Focus, Innovation and Implementation, Collaboration, and Environmental and Social Responsibility. This Code aims to elevate ethical standards and transparency in the Company's governance, consequently strengthening the faith and assurance of diverse stakeholder groups.

1. RESPONSIBLE BUSINESS PRACTICES:

1.1 Conduct of Business

- i. The Board Members, the Senior Management Personnel and the Employees shall conduct the Company's business in an efficient and transparent manner and in meeting its obligations to shareholders and other stakeholders.
- ii. The Board Members, the Senior Management Personnel and the Employees shall not be involved in any activity that would have any adverse effect on the objectives of the Company or against national interest. The corporate objectives to be pursued shall be to sustain the competitive edge of the Company and not to indulge in any activity, which is detrimental to the society at large.

1.2 Quality Services

All Employees shall be committed to rendering services of the highest quality standard as per the requirements of the clients to ensure their total satisfaction. The quality standards shall be in consonance with national/international standards.

1.3 High Level of Ethical Standards

Both in their personal and work lives, every member of the Board of Directors, Senior Management Personnel, and Employees within the Company must uphold elevated ethical norms and refrain from engaging in any actions that reflect moral misconduct.

1.4 Corruption and its associated unlawful practices

HPIL has zero tolerance against any intencancies of corruption, bribery, extortion or malpresentation of financial statements. All Employees, in their individual capacity or while representing the Company, are strictly prohibited from engaging in any form of corruption or giving or accepting any kind of bribe, kickbacks or facilitation payments, directly or indirectly. None of the Employees shall indulge in giving or receiving extravagant, lavish or uncustomary gifts to government or public authorities, during or after business hours. In the situation that accepting a bribe bears a direct threat to their lives, Employees should immediately inform their immediate manager.

1.5 Fair Competition

The Board, the Senior Management Personnel and Employees shall ensure that the Company's services are made available to the clients freely and shall not make false/misleading statements about the competitors' services or indulge in any unfair trade practices. None of the Employees should be involved in practices such as price fixing, rigging bidding processes and colluding in markets. It is expected that the credentials, achievements, qualifications and corporate affairs of HPIL are discussed with honesty and accuracy. The Employees shall not exchange Company related confidential and sensitive information with competitors, peers, customers, or any of their representatives in any way that will improperly influence the marketplace or outcome of a bidding or negotiation process.

1.6 Wealth Creation

Every employee must consistently work towards increasing shareholders' net wealth and strictly adhere to all regulations and laws governing shareholders' rights.

2. OUR ETHICAL COMMITTEMENT:

2.1 Protecting Company's Assets

No Employee should indulge or encourage any activity, which would result in misuse of the Company's tangible and intangible assets. All Employees are responsible to take

utmost care of Company resources provided to them and report loss, theft, or damage of any company assets.

2.2 Confidentiality

All Employees shall ensure and take all reasonable measures to protect the confidentiality of non-public information about the Company, its business, clientele, affiliates, and other materially significant information obtained or created in connection with any activities with the Company and to prevent the unauthorized disclosure of such information unless required by applicable laws or regulations or legal or regulatory process. The confidential information also extends to any employee data, personal data or third party information as shared by the Company. The Employees shall take appropriate measures by instruction prior to disclosure of any of the confidential information and safeguard and assure against any unauthorized use or disclosure of such information. The Employees agree to notify the Company promptly if it learns of any use or disclosure of the Company's Confidential Information in violation of this Code.

2.3 Consumption of Intoxication drinks and drugs

The Directors and Employees shall:

- ❖ Strictly abide by any law relating to liquor, narcotics, or any other form of intoxication drugs in force in any particular locality or nation they may happen to be for the time being.
- ❖ During the course of their duty, not to be under the influence of any liquor, narcotics, or any other form of intoxication drugs and shall take due care that the performance of their duties at any time is not affected in any way by the influence of such drinks or drugs. Repeated indulgence in liquor on regular basis results in addiction, affects health of the resource concerned and ability to think & work in a normal way due to mental & physical tiredness.

2.4 Misrepresentation and Political involvement

Employees are prohibited from making untrue statements or offering deceptive information about the Company's products, services, and achievements. This includes the safety and environmental characteristics of the products or services. Furthermore, employees must avoid presenting themselves as representatives or spokespeople while participating in any political party or political activities in their personal capacity.

3. OUR RESPONSIBILITY TOWARDS THE ENVIRONMENT AND THE COMMUNITY:

3.1 Environmental compliance

HPIL complies with essential environmental laws and regulations and ensure that our operations have little to no negative impact on our surroundings. The Company is committed to protecting and preserving the natural ecosystem. All facilities and offices should ensure the efficient use of natural resources through a robust environmental management mechanism.

3.2 Community Development

HPIL is responsible for the community and the surroundings that the company operates in. With this in mind, HPIL engages with the community through its Corporate Social Responsibility (CSR) initiatives to make a positive impact on the community by imbibing values of sustainable development.

4. VARIATION OF THE CODE AND WAIVERS:

The Code shall be reviewed from time to time for updation thereof. Any variation in the Code or any waivers from the provisions of the Code shall be approved by the Board Directors of the Company and shall be disclosed on the Company's website.
