

**LA TIM METAL & INDUSTRIES LIMITED**  
**(Formerly Known as Drillco Metal Carbides Limited)**

**CODE OF CONDUCT FOR EMPLOYEES**

**Introduction:-**

Ethical business conduct is critical to all business. La Tim Metal & Industries Limited (“the Company”) has adopted a Code of Business Conduct to provide guiding principles for Employees to conduct business with honesty and integrity.

No Employee should engage in any conduct, professional or personal, nor make any statement that is likely to prejudice the Company's business or to harm, defame or otherwise bring discredit upon or denigrate the Company, its Directors, employees, suppliers or customers.

The Company expects all Employees to maintain a co-operative, efficient, harmonious and proactive work environment. This Code applies while working on-site or off-site or any other place where the Employee is a representative of the Company.

Since no code or policy can anticipate every situation that may arise, Employees may discuss questions about the Code's application to particular circumstances with the Managing Director or the Company Secretary. The basic premise is that an Employee should not only avoid any wrong-doing but should also avoid any appearance of wrong-doing.

**Purpose**

The purpose for this Code of Conduct is to sets out the fundamental standard which is to be followed by employees in their everyday actions on behalf of the Company. Further guidance on the Company's standards in specific areas will be providing through policies and guidelines.

**Scope:-**

This Code of Conduct applies only to La Tim Metal & Industries Limited within all Sectors, regions, areas and functions.

## **Policy:**

Each La Tim Metal & Industries Limited employee must:-

- Conduct the Company's business with honesty and integrity and in a professional manner that protects the company's good public image and reputation.
- Build relationships with customers, vendors and fellow employees based on trust and treat every individual with respect and dignity in the conduct of Company business.
- Become familiar with and comply with legal requirements and Company policy and procedures.
- Avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to the Company's reputation or image.
- Avoid actual or potential conflicts or interests with the Company, or the appearances thereof, in all transactions.
- Provide accurate and reliable information in records submitted, safeguard the Company's confidential information, and respect the confidential information of other parties with whom the Company does business or competes.
- Promptly report to the Company any violations of law or ethical principles or Company policies that come to the employee's attention and cooperate fully in any audit, enquiry, review or investigation by the Company.
- Every employee has a duty of undivided loyalty to La Tim Metal & Industries Limited. This means that employees should make decisions objectively and in the Company's best interests. Competing personal interests can interfere with an employee's judgment.

For these reasons, each employee should either avoid or fully disclose in writing to the company any activity, interest, association or relationship that could conflict with the independent exercise of his or her judgment in the best interests of the Company. La Tim Metal & Industries Limited believes that most questions involving a potential conflict of interest can be equitably resolved if adequately disclosed to and reviewed by management.

No policy can set out a complete list of all possible conflicts of interest. Some circumstances will clearly indicate a conflict, and in those cases, an employee should on his own initiative resolve or avoid the conflict. In many cases, it will be difficult to judge whether a conflict prohibited by this policy exists, and employees are encouraged to consult with their supervisors, Human

Resources before taking any action. Particularly difficult questions should always be discussed with the most senior executive responsible for the functional area or business group involved, or the Managing Director and CFO of the Company.

### **Responsibility**

- All employees must uphold these standards in the conduct of Company business and the Company must handle, in a manner consistent with these standards and related policies, all actual and apparent conflicts of interest between personal and professional relationships and all other matters governed by this code and such related policies. If a decision about a particular action is not covered specifically by this code or related corporate policies, employees are required to seek guidance from their supervisor or appropriate internal resources, such as the Human resources or Compliance Officers.
- Senior management should be a role-model for these standards by visibly demonstrating support and by regularly encouraging adherence by managers. The Management should ensure all their employees receive guidance, training and communication on ethical behavior and legal compliance relevant to their duties for the Company.
- Failure by any employee with this or any La Tim Metal & Industries Limited policy will subject employees to disciplinary up to and including separation from employment with the Company.

### **Reporting Violations**

To report violations of the policy without fear of restriction, or to request advice when in doubt about the propriety of some action, call or write to:-

Mr. Juggal Mimami

La Tim Metal & Industries limited

201, Navkar Plaza, Bajaj Road,

Vile Parle (West), Mumbai, Maharashtra -400056

Contact No. 022-26203399/3434

## **Acceptance of Code of Conduct**

### **Quote**

I have received and read the Company's Code of Business Conduct. I understand the requirements of this Code and the ethical behavior expected from an Employee. I further agree to comply with the Company's Code of Business Conduct. If I have questions concerning the meaning or application of the Code of Business Conduct, or Company's policies or the legal and regulatory requirements, applicable to my job, I know I can consult my Superior, the Company Secretary or Managing Director, knowing that my questions or report to these queries will be maintained in confidence.