

Business Code of Conduct and Ethics Policy

Applicability: All employees of the company.

Code of Conduct:

1. It is the responsibility of all the employees to maintain and protect the reputation and integrity of Ocimum Labs Pvt Ltd (OL).
2. All employees must conduct themselves in a responsible and unbiased manner and keep the interests of the organization in mind.
3. During their association with the company, they must devote the whole of their time, attention, ability and energy in discharging the assigned duties with sincerity and dedication.
4. Employees must not engage in any paid or unpaid parallel employment which might adversely affect their performance, without the written permission of the employer.
5. Should any employee attend work or carry out duties in an undesirable manner, the employee will be subjected to disciplinary action, which may in certain circumstances lead to the employee's summary dismissal.
6. All the employees are expected to comply with both the letter and spirit of this statement and the Code of Conduct in their dealings with investors, service providers, business partners and fellow employees.
7. The following are the key guidelines:
 - 7.1 Obey all applicable laws, regulations and professional standards that govern the business.
 - 7.2 Recognize and value professionalism.
 - 7.3 Maintain an environment of honesty, trust and integrity.
 - 7.4 Respect the organization and your colleagues.
 - 7.5 Protect the property and interests of the organization.

Professional Work Environment

1. Treatment:

- 1.1. OL endeavors to create an environment where people are respected in their individual capacities and treated as equals, irrespective of their levels.
- 1.2. Employees are free to express and exchange their opinions and ideas which, according to company, is the best way to promote teamwork. This builds team spirit, fosters mutual respect and encourages them to contribute in a holistic manner to attain common goals.

- 1.3. The team OL consists of employees with diverse cultures, perspectives, skills and expertise. Irrespective of this diversity, we collectively conduct ourselves such that we represent OL's culture of openness, teamwork, striving for excellence and customer satisfaction.
- 1.4. As a member of OL, your conduct reflects not only on your personality, but also on the reputation and professional standards of our organization. We rely on your sense of responsibility and judgment to conduct yourself in a professional manner. All those who come in contact with any of our staff should be welcomed, made comfortable and respected. This applies to all situations that influence the work environment as a whole.
2. Equal Opportunities: OL believes that all its employees should be given equal opportunities. There shall be equity & fairness in respect of recruitment, placement, training & development, promotion, compensation and assignments, either in India or abroad. Merit & Performance are the only basis for all these opportunities. The Company does not discriminate in any opportunities or practices on grounds of race, colour, religion, sex, national origin, age or disability.
3. Nurturing Talent:
 - 3.1. Mechanism is in place to identify leaders who can rise to the emerging opportunities and challenges through a combination of self and sponsored learning. Senior management team constantly works towards identifying performers with high growth potential. The Company has adopted a competency
 - 3.2. based tiered approach to leadership pipeline & succession planning, with tier one having people who are ready to lead business now, tier two in the next 3 - 5 years, and tier three in another 5 - 7 years.

Employee Obligation:

1. The offer of employment is based on information provided by the employees in their application form, curriculum vitae and the interview process. Any false or misleading information including suppression of material facts will be considered as serious offence.
2. All the employees are required to enter into a confidentiality agreement which form part of the employment rules & regulations.
3. Employees are requested to bring to the notice of Management / Senior Team any acts of illegal nature at work place or otherwise relating to work, without any fear.
4. The employee is expected to disclose to the employer any injuries and/or illnesses previously suffered that may affect an employee's ability to effectively carryout the duties for which he/she has been appointed.

5. Smoking & Liquor consumption is prohibited at all the operational locations and Corporate Office. Employees who breach this policy shall be subjected to disciplinary action.
6. It is an offence for any employee to pass racist, defamatory, abusive or slanderous remarks or use provocative gestures likely to create ill-will among a group or shatter its team-spirit.
7. Sexual harassment or molestation will not be tolerated by the employer and suitable disciplinary action will be taken if allegations of the same are substantiated.
8. It is expected that all the members would notify HR any change in their personal data, viz. change of address, contact numbers, marital status (especially for nomination of spouse for the purpose of Provident Fund and Insurance), cases of births and deaths in the family, acquiring of any professional qualifications etc. It is the responsibility of the employee to update details as required for administrative purposes & Mediclaim Policy.
9. Any employee, convicted of criminal offence, excluding minor road traffic offence, should notify the same to HR Department immediately.
10. In case of ambiguity in work, Employees should remember the guiding values of the organization. Employees should seek guidance from his/her immediate supervisors or from the legal/compliance teams.
11. Employees will ensure they do not involve in any communications or practices that Prevent or reduce competition in our products / services market.
12. Any interaction with competitor(s) which involves material information and may potentially affect or undermine the competitors or the company's business prospects must be avoided and reported.
13. Employees are expected to be familiar with statutory laws applicable related to his/her duties and follow the same diligently. Any violations should be reported to Management / Senior Team.
14. Safety is of utmost importance for the organization. No Employees should indulge in any activities that may undermine the health & safety of any other person in the organization.
15. Employees should never indulge in any hostile physical contact, intimidation, threats, violence or possession of weapons of any kind while on company premises, at a company- sponsored event or while representing the company outside the workplace.
16. Employees should always use information systems responsibly by adhering to the company policy on information systems. No employee will indulge in activities such as unauthorized copy, modify, or share information, perform unlawful activities, disseminate information that may hurt sentiments of the fellow employees. In case of any unlawful activities, the employee bears all the legal consequences arising due to such acts.
17. All employees should abide by other policies framed by HR department. Employee shall not represent the company in public places unless authorized to do so.

Bribery, Corruption & Fraud:

1. A bribe is a reward (monetary) advantage or other benefit made to influence or secure an improper advantage. Typically, a bribe is used to secure or retain a business and/or license. Kickback, i.e., return or receipt of a percentage of money received under a contract is also a form of bribe. A bribe can be made to induce a person to act in an improper way or violate an official duty. It can also be made to induce a person not to act in a particular way or favour a decision. Bribery can take the form of monetary instruments, such as cash, or can be anything of value (e.g., travel, services, discounts, gifts, etc.). Ocimum Labs (or its subsidiaries) Employees must not engage in any form of bribery, either directly or indirectly.
2. Bribery is a form of corruption, but corruption also includes many other dishonest practices such as embezzlement, fraud, nepotism, collusion and abuse of power. Ocimum Labs (or its subsidiaries) Employees must not engage in any form of such activities.
3. Fraud is if a person lie in order to deprive a person or organization for their money or property. Ocimum Labs (or its subsidiaries) Employees must not engage in any form of such activities.

Gifts: Ocimum Labs (including subsidiaries) Employees must not offer or accept any gift or hospitality other than business gifts of very small intrinsic value. For example, diaries, calendars and other low value corporate branded goods, candy boxes, sweets (of limited quantity) may be accepted or given.

Hospitality: Though modest hospitality is an accepted part of commercial life and business relationships, an Employee or any member of their family should not, directly or through others, accept or offer hospitality that could influence or reasonably give the appearance of influencing the relationship with that organization or individual.

Employee Responsibility: Every employee must ensure that he / she reads, understands and complies with this policy. The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for Ocimum Labs. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any violations should be reported to the HR / Senior Team / Management.

Conflicts of interest: Our employees shall always act in the interest of our company and ensure that any business or personal association including close personal relationships which they may have, does not create a conflict of interest with their roles and duties in our company or the operations of our company. Further, our employees shall not engage in any business, relationship or activity, which might conflict with the interest of our company or our group companies.



Diversity, Equity and Inclusion: Ocimum Labs is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion. Ocimum Labs ensures that all the employees have responsibility to treat others with dignity and respect all the times. It allows employees to seek assistance from immediate superior or HR representative if the employees who believe they have been subjected to any kind of discrimination. Ocimum Labs will take disciplinary action if any employee found to have exhibited any inappropriate conduct or behaviour against others.

Anti-competitive Practice: Prohibited exchange of confidential information (such as prices, costs or profits) occurs where parties who compete with one another, even if contemplating a transaction or the exchange of information in another context, engage in discussions or information exchanges that adversely impact competition between them. Ocimum Labs will take disciplinary action if any employee found doing any such activity.

Freedom of Association: Employees may be interested in joining associations or involving themselves in Association activities in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.

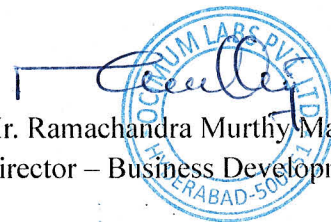
Training and awareness: All employees are trained on this code of conduct and ethics policy as part of their induction training and was open to everyone (suppliers, customers and other internal and external stakeholders).

Violation of Policy: Any violation of this Business Code of Conduct and Ethics Policy by any employee / other stakeholders shall be viewed seriously by the Company. Any employee can report any incident or event of violation of this Policy to HR Department of the Company and HR Department will take suitable action and report the same to the Management. Company hereby assures the employees that the information of the employee who reports any incident of violation of this policy shall be kept strictly confidential.

Power to Amend: The management may at its discretion amend or withdraw any or all of the above provisions of this policy at any time with/without notice.

Date: 01st January 2025

Mr. Ramachandra Murthy Mandala
Director – Business Development.



Page 5 of 5

Ocimum Labs Private Limited
(An ISO 9001:2015 Certified Company)

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