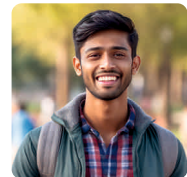


GUIDE TO BUSINESS CONDUCT



Dear Colleagues,

E.I.D. - Parry (India) Limited ("EID Parry") has always strived towards a reputation of trust, integrity, and ethical business practices, by consciously and continually reinforcing the importance of our values and beliefs. As an institution which is more than 230 years old and one of the oldest surviving enterprises in the world, we have developed our own ethos, traditions, and created precedents. Our challenge is to continue maintaining this high standard, even as we aspire phenomenal growth and work in multi-cultural environments.

To this end, we are adopting the 'EID Parry's Guide to Business Conduct (EGBC)' to set forth the principles which will guide our transactions with each other, our customers, value chain partners, governments, communities, shareholders, and other stakeholders. The essence of this code is based on the values and beliefs of the Murugappa Group and Code of Conduct.

To be a value-based Company, everyone must participate in the process of ensuring our business lives up to our ideals. The EGBC serves as the basis for the way we manage our business.

The EGBC is applicable to all employees across all locations. The standards apply while working on our premises, at offsite locations where business is conducted, at EID Parry sponsored business and social events, or at any other place where we represent EID Parry. We are committed to continuously review and update the EGBC to keep it aligned with the ever-changing business environment.

The EGBC serves as an ever-present reminder of our responsibility to build our relationships with our stakeholders on a platform of integrity, fairness, and humility. EID Parry's reputation is entrusted to each of us and to this end, I urge you to practice the EGBC in letter and spirit.

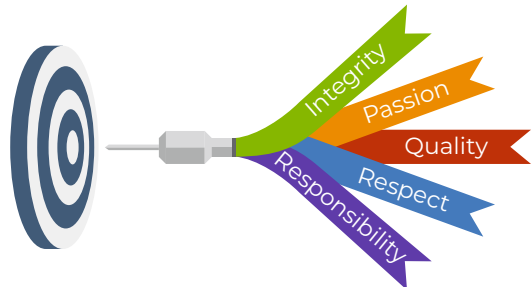
Sincerely,

Muthu Murugappan

Whole Time Director and
Chief Executive Officer



VALUES &
BELIEFS



A little sweetness can go a long way

Adherence and Upkeep of faith in EID Parry's Guide to Business Conduct

1. On accepting employment with EID Parry, the employee becomes accountable for adhering to all the provisions of the EGBC and all new employees should be provided a copy of the EGBC during the on-boarding/induction process.
2. The EGBC is intended to supplement and not replace the existing regulations & policies applicable to employees.
3. If the EGBC defines a higher standard of conduct than specified by law, then the EGBC shall prevail.
4. Any waivers from the EGBC should be approved by the Managing Director/Chief Executive Officer or a person nominated by him.
5. Managers should communicate the importance of adhering to the EGBC to all their subordinates.
6. In case of non-compliance or violation of the EGBC, employees should bring the same to the attention of the Functional Heads or the Human Resources Function.
7. It is incumbent upon every employee to make a full disclosure to the HR function of any interest, the employee or his/her Relative¹ may have in a Company, or a firm which is a value chain partner(s) or has other business dealings with EID Parry.
8. Employees should discuss with their Functional Heads or the HR function for any clarification regarding the interpretation of the EGBC.
9. Any employee who violates the EGBC will be subject to corrective or disciplinary action, irrespective of his/her competence and grade.
10. The upkeep and maintenance of the EGBC is the responsibility of the HR function and they should:
 - a. Ensure annual assessment and review of the EGBC.
 - b. Provide compliance training with the EGBC.
 - c. Respond to questions about the guidelines.
 - d. Check reports of violations of the EGBC.

¹'Relative', with reference to any person, means any one who is related to another, if—

- (i) They are members of a Hindu Undivided Family;
- (ii) They are husband and wife; or
- (iii) One person is related to the other as follows:
father, mother, son, son's wife, daughter, daughter's husband, brother, sister

Integrity

We value professional and personal integrity above all else. We achieve our goals by being honest and straightforward with all our stakeholders. We earn trust with every action, every minute of every day.





Do's

Integrity

1.1 Ethical Conduct of Employee

- a. Represent EID Parry with pride and display high moral and ethical standards and deal on behalf of EID Parry with professionalism, honesty, and integrity.
- b. Refrain from granting personal favours or display favouritism in any activity that is related to EID Parry.
- c. Surrender all items as mentioned in the Employee Clearance Form at the time of separation/transfer.
- d. Adhere to the guidelines as specified in the Delegation of Authority (DOA) Manual.
- e. Follow all terms and conditions as mentioned in the contract of employment.

1.2 Ethical Dealing with Government

- a. Employee of EID Parry should not align himself/herself with any political party.

1.3 Ethical Dealing with Value Chain Partners

- a. Comply with all applicable laws and provisions governing procurement/import of raw materials and all other international transactions.
- b. Select value chain partners/contractors/service providers through a competitive bidding process or as permitted/provided under the Company's policy, unless it is decided as a business strategy to go with a specific service provider. Selection decisions should be based on objective criteria such as price, quality, service, reliability, integrity, etc.
- c. Protect the proprietary information of value chain partners or joint venture participants with the same amount of caution as exercised in protecting EID Parry's information.

1.4 Ethical Dealing with Customers

- a. Strive to meet and exceed customer's expectations of quality, cost, and delivery.
- b. Abide by all applicable statutes relating to the protection of consumer interests including the Consumer Protection Act and honour the privacy rights of its consumers.
- c. Maintain confidentiality of personal information such as names, emails, telephone numbers, addresses, and other business-related data collected from farmers or dealers for any product promotion or for database purposes.



1.5 Ethical Dealing with Competition

- a. Respect patents, trademarks, and copyrights of competition.
- b. Collect competitive information only through legally permitted sources and ethical means.
- c. Co-operate with competition in making industry representations to the government to solicit measures favourable to the industry.
- d. Participate in respected industry associations with a view to share the best practices and define dealer credit terms, payment practices, discount policies etc.

1.6 Accepting or Giving Gifts

- a. Gifts or personal benefits which have no likelihood of improperly influencing the employees.
- b. Adhere to the policy on gifts as mentioned in Anti-Corruption and Anti-Bribery Policy.
- c. For any queries on whether a particular gift is acceptable or not, contact Head HR/Company Secretary/Head Legal.

1.7 Maintain Accurate Financial Records and Reports

- a. Prepare and maintain the records of EID Parry's financial position fairly and accurately in accordance with the accepted accounting and financial reporting standards of the country in which EID Parry conducts its business affairs.
- b. Recognise revenue and expenses timely and properly. Value assets and liabilities appropriately.
- c. Ensure full, fair, timely and accurate disclosures or filing of communication with SEBI, Stock Exchanges, Government departments & agencies, or financial community.

1.8 Comply with all Applicable Statutes

- a. Employees should be knowledgeable/aware of the laws, regulations etc, laid down under statute as applicable to their jobs and areas of responsibility.
- b. Comply with all laws and regulations while carrying out your job, both in letter and in spirit, as applicable in the regions where we operate.



Do's

Integrity

1.9 Abstain from Insider Trading

- a. Adhere to the norms of insider trading as specified in EID Parry's Code² for Prohibition of Insider Trading.
- b. Trade in stocks or securities of EID Parry or other Murugappa Group companies only two business days after the material, non-public information, or the quarter or annual results of the company have been released by duly complying with the procedure as specified in the code.*
- c. Maintain confidentiality of non-public information, even after leaving EID Parry till it has been adequately disclosed to the public.

²'Code' shall mean the Code of Conduct to regulate, monitor, and report trading by the Designated Persons in securities of the Company as amended from time to time.

*This is applicable only to Designated persons as defined in the Code.



1.1 Conduct of Employee

- a. Don't compromise with the EGBC.
- b. Don't use EID Parry's funds or assets for personal use except those provided to employees for restricted personal usage.
- c. Don't submit wrong expense claims or submit false certificates to avail any benefit.
- d. Don't perform outside/personal work or solicit outside business while on EID Parry premises or while working on official time without notifying immediate superior or functional head.
- e. Don't bind the Company or enter into any transaction on behalf of the Company beyond the power vested in the employee by the DOA or the position or the letter of authorisation/power of attorney.
- f. Don't trade in stocks or securities of EID Parry or other Murugappa Group companies without complying with the code.

1.2 Dealing with Government

- a. Don't bribe any government official/representative to get any favourable results or influence their decisions/conduct to expedite the progress of work.
- b. Don't make a false statement or a false claim to a government official or conceal any documents regarding payment claims.
- c. Don't violate the Company's Anti-Corruption and Anti-Bribery Policy.

1.3 Dealing with Value Chain Partners

- a. Don't seek to get any unjustifiable discounts or benefit while purchasing any product or services from value chain partners for personal use.

1.4 Dealing with Customers

- a. Don't use prices, promotional allowances, credit and service assistance, etc., as a means to extend personal favours to customers, unless it is decided as a business strategy.
- b. Don't share personal information, such as names, emails, telephone numbers, addresses etc., collected from customers, with any third party without the permission of the concerned person, unless required to help EID Parry provide service to its customers, and that too only if such third party agrees to protect the privacy and security of such information.
- c. Don't support business or marketing plans that involve inappropriate or unauthorised collection, use or disclosure of individual customer information.



Don'ts

Integrity

1.5 Dealing with Competition

- a. Don't infringe upon the trade secrets, intellectual property rights and proprietary, and confidential information of competition.
- b. Don't force an employee who has worked with a competitor previously to share the proprietary information of that competitor.
- c. Don't employ unfair practices to obtain data about competitor activities, competitor strategy, and other trade secrets or proprietary information.
- d. Don't indulge in industrial espionage or make misleading statements about competitor's products and services to sabotage competition.

1.6 Accepting or Giving Gifts/Bribes

- a. Don't accept, either directly or indirectly, through money, gifts of significant value, donations, personal benefit of monetary value from existing or potential competitors, customers, value chain partners, or other third parties which have or are seeking to have business dealings with EID Parry.
- b. Don't receive any money, rebate or anything of value from any government official or agency for extending them any favourable treatment.
- c. Don't give any gift, or make any illegal payment to an executive or employee of any contractor, value chain partners, or competitor which results in EID Parry obtaining an improper advantage.

1.7 Financial Records and Reports

- a. Don't make willful omissions or misleading transactions in the books and records of EID Parry, and no fund, asset or account of EID Parry may be established, acquired, or maintained without being properly reflected in the books.



1.8 Insider Trading

- a. Don't proliferate insider information³ including Unpublished Price Sensitive Information⁴ (UPSI) to outsiders, friends, relatives, or derive any benefit, for ourselves or family, from the access to and possession of any material information about the Company.
- b. Don't participate in insider trading, stock tipping, trade in stocks of EID Parry or other Group Companies in violation of the Code for Prohibition of Insider Trading, either by your immediate relatives⁵ or yourselves.

³Insider information - Material information about the company's activities that has not been disclosed to the public.

'Insider; means any person who is

- A connected person or
- In possession of or having access to unpublished price sensitive information

Connected person means any person who is or has during the six months prior to the concerned act been associated with the company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being an employee of the company that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access. Any Immediate Relative of such person shall also be deemed to be a connected person.

⁴Don't proliferate insider information including Unpublished Price Sensitive Information (UPSI) means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities of the Company and shall, ordinarily include but not be restricted to, information relating to the following:

- i. Financial results
- ii. Dividends
- iii. Change in capital structure
- iv. Mergers, de-mergers, acquisitions, delistings, disposals, and expansion of business and such other transactions
- v. Changes in Key Managerial Personnel.

⁵Immediate relative shall mean- A spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

Passion

We play to win. We have a healthy desire to stretch, to achieve personal goals, and accelerate business growth. We strive constantly to improve and be energetic in everything that we do.





Do's

Passion

2.1 Workplace Drive

- a. Be passionate about advancing EID Parry's common goal of bringing innovative products to the marketplace to constantly improve the life of the customer.
- b. Have a "can do" attitude and believe in making possibilities realities.
- c. Take pride in maintaining high standards of quality and continuously improving and excelling in work and behaviour.
- d. Strive to exceed the expectations of the role. Believe in your potential and maximise that potential.
- e. Have a passion for something that's fun, worth doing, or never been done.
- f. Venture where others would not dare and provide distinctive, original, and impactful work.
- g. Protect and promote the values driving the business.
- h. Say "no" to questionable business deals.
- i. Demonstrate passion and stand up for the Company's convictions.
- j. Use passion to activate minds, expand awareness, and challenge thinking out of the conventional box.
- k. Make a difference in the communities where we operate, work, and live.
- l. Fearlessly ask tough questions while searching for the best answers.
 - Are we working on things we are truly good at?
 - Do our people go home at the end of the day emotionally charged or emotionally drained?
 - Will the projects we are working on today be remembered five years from now?
 - Are we proud of the work we do?

If we can answer "yes" to these questions, we can cultivate the kind of passion that enables us to live more fulfilling lives, lead courageously, engage in work we are proud of, and stride boldly into a successful future.

2.2 Promote Innovation, Creativity, and Freedom as a Way of Life

- a. Treat subordinates as individuals, encourage creative and innovative thinking among them, and provide them the freedom necessary to demonstrate passion on the job.
- b. Share team relationships based on mutual respect and trust. Assume equal responsibility to achieve departmental objectives with a passion to win.
- c. Strive to arrive at innovative solutions for every problem.
- d. Reward and recognise creativity in public forums.



Do's

Passion

2.3 Workplace Ambience

- a. Ensure that the workplace is lively and releases positive energy to make it exciting and productive.



Don'ts

Passion

2.1 Workplace Drive

- a. Don't choose career paths to please others - focus on what you enjoy doing.
- b. Don't stop striving for higher levels of excellence in all areas of work.
- c. Don't avoid challenging goals - they present opportunities to discover true potential.
- d. Don't refrain from supporting colleagues if they fail despite giving their best - encouragement may help them succeed the next time.
- e. Don't allow indiscipline and discouragement to pervade the work culture.
- f. Don't neglect upholding the Company's values in all aspects of work life.
- g. Don't be late for duty.
- h. Don't allow a day to pass without achieving something.

2.2 Promote Innovation, Creativity, and Freedom as a Way of Life

- a. Don't be afraid to think differently, innovate, and make a positive difference at work.

2.3 Workplace Ambience

- a. Don't compromise on the need for a safe work environment.
- b. Don't treat employees without dignity and respect.
- c. Don't make the workplace dull and routine.

Quality

We take ownership of our work. We unfailingly meet high standards of quality in both what we do and the way we do it. We take pride in excellence.





Do's

Quality

3.1 Commitment to Quality of Products

- a. All EID Parry's products sold in the market should meet the statutory norms as applicable to the product and confirm to the Company's quality policy.
- b. Customer satisfaction, trust, and goodwill are of utmost importance to EID Parry and hence their opinions, concerns and enquiries regarding our products should be attended on priority.
- c. Be courteous to all customers. Customer dissatisfaction and complaints should be addressed promptly and courteously.

3.2 Advertising

- a. Any advertising done by EID Parry, either for its products or services, for Company brand building or for recruitment purposes should be accurate, honest, and not misleading.
- b. Design creative and innovative advertisements to promote EID Parry's products.
- c. Any claim made towards the performance or any other attribute of any of EID Parry's products should be supported and substantiated by clinical and field trial results, wherever possible.
- d. Adhere with all the legal requirements regarding trademark rights and competitor infringement policies.
- e. In case of product endorsement, secure signed documents from the endorsers attesting to their experience with our products, prior to the release of such communication.



Don'ts

Quality

3.1 Advertising

- a. Don't showcase EID Parry's advertisements in media that have anti-social or anti-national undercurrents.
- b. Don't stereotype individuals or portray/depict competition or any community, race, religion, or gender in a demeaning or ill-humouredly manner, either directly or indirectly in our advertisements.
- c. Don't resort to puffery⁶ while advertising EID Parry's products.
- d. Don't plagiarise well known slogans or advertising themes.

⁶Puffery refers to an expression of opinion by a seller that isn't made as a representation of fact.

Respect

We respect the dignity of every individual. We are open and transparent with each other. We inspire and enable people to achieve high standards and challenging goals. We provide everyone equal opportunities to progress and grow.





4.1 Value Employees as Organisational Assets

- a. Demonstrate EID Parry's commitment towards caring for its employees by promoting a culture of recognition for individual and team achievements.
 - b. Employee practices and policies should ensure equal opportunities for all employees and all qualified applicants for employment, without any discrimination based on race, religion, gender, age, caste, region, marital status, or a disability unrelated to the requirement of the position.
 - c. Respect human rights and appreciate human dignity irrespective of grade and designation.
 - d. Respect the importance of work-life balance.
 - e. Recognise the value of gender diversity and a diverse workforce and respect, appreciate, and value individual differences.
 - f. Regularly counsel subordinates and discuss with them about their work-related problems and provide necessary developmental support.
 - g. Respect individual privacy and dignity of employees and acquire only that personal information which is statutory or as required by EID Parry's HR Process Manual.
 - h. Prohibit any act of harassment to employees, whether physical, verbal, or psychological.
 - i. Adhere to all the Companies policies including the following:
 - Whistleblower Policy and Vigil Mechanism
 - Policy on Prevention of Sexual Harassment (POSH)
 - Business Continuity Policy (BCP)
 - Anti-Corruption and Anti-Bribery Policy
 - Social Media Policy
 - Equal Opportunity Policy
 - Human Rights Policy
 - Safety, Health, and Environment Policy
 - Policy on Preservation and Archival of Documents
 - Policy for Determination of Materiality for Disclosure of Information / Events to the Stock Exchanges
 - Disclosure of Information / Events to the Stock Exchanges
 - Cyber Security Policy
 - Energy Policy
 - Food, Safety, and Quality Policy
 - Risk Management Policy
 - Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information
 - Investors Relation Policy
 - Code for Prohibition of Insider Trading
- The policies as may be framed by the Company from time to time and such other policies are available on the Company's Intranet.



4.2 Respect Employee Fundamental Rights

- a. Respect employee participation in lawful associations and encourage discharge of their fundamental and constitutional rights and duties.

4.3 Climate of Team Spirit, Trust, and Mutual Respect

- a. Our dealings with peers, subordinates, and superiors should be governed by an overriding commitment to EID Parry's success. Company priorities supersede all individual and functional priorities.
- b. As peers, fulfill responsibilities as a member of a winning team and provide requisite support to other team members to achieve mutual objectives.
- c. As superiors, facilitate setting of objectives and clearly define the standards of performance desired and create an open, fearless environment that is conducive to teamwork.
- d. As subordinates, demonstrate an attitude of ownership to tasks and promote team spirit and inquisitiveness for knowledge.

4.4 Workplace Ambience

- a. Be punctual for all official engagements i.e., arriving on time for work, arriving on time for all official meetings.
- b. Strive towards meeting ergonomically prescribed standards in the workplace.
- c. Maintain adequate decibel levels while conversing over phone so as to not disturb others.
- d. Keep mobile phones in a silent mode or non-disturbing mode during meetings/presentations.
- e. As a brand ambassador of EID Parry, uphold EID Parry's image by conducting yourself properly in public. Dress appropriately on working days and for official/business meetings & get-togethers in a manner consistent with the dress code of the location or any dress code as may be specified.
- f. Comply with all applicable health and safety policies to eliminate workplace hazards and provide a safe, healthy, and stress-free work environment for employees.

Appropriate Dressing:

Corporate, Bangalore & Delhi office

- Mon to Thur - Business Formals
- Fri - Business Casuals

Sales Team

- Mon to Sat - Business Formals

Factories

- Mon to Sat - Uniform



4.5 Culture of Openness

- a. Practice an open culture across the organisation both in letter and spirit.
- b. Practice an open-door policy.
- c. Foster a culture of informality and refer to others on a first name or surname (with appropriate title) basis, whichever is comfortable with the employee, instead of addressing or referring by designation.
- d. Share information about EID Parry's business developments and key happenings on a need-to-know basis and in accordance with the Code of Practices and Procedures for fair disclosure of UPSI with everyone in the organisation.

4.6 Protect and Prevent Misuse of EID Parry's Assets

- a. Employ EID Parry's tangible, intangible and IT assets only for conducting the business for which they are duly authorised, other than those provided as benefits and should not be used for any personal/outside work.

Tangible Assets (Illustrative): includes equipment and machinery, facilities, transport, raw materials, unfinished product, unsold inventory, office space, and corporate credit cards etc.

Intangible Assets (Illustrative): includes proprietary information, trade secrets, goodwill, customer & supplier relationships, and IPR etc.

IT Assets (Illustrative): includes all personal computers, laptops, network servers and all other associated computer hardware and software technologies, voice mail and voice systems, EID Parry's intranet and internet access etc., that is owned, leased, or rented by EID Parry.

- b. All EID Parry employees, agents, and contractors should protect and prevent misuse of all Company assets and ensure that assets are not misappropriated.
- c. Care for the equipment provided by EID Parry for our efficient and effective working. Use it responsibly and take precautions to protect it from theft or damage. Return all equipment at the time of separation from EID Parry.



Don'ts

Respect

4.1 Employees as Organisational Assets

- a. Don't be a party to any act of sexual harassment of employees, customers, vendors, or other value chain partners, whether physical, verbal, or psychological.

4.2 Workplace Ambience

- a. Don't solicit or promote support for any cause or organisation by distributing or circulating any literature or printed material during the official working time.
- b. Don't conduct EID Parry's business under the influence or possession of alcohol, illegal drugs, or controlled substances.
- c. Don't carry any weapons or firearms on EID Parry premises, including in vehicles or on other private property that may be visited while conducting EID Parry's business.
- d. Don't enter any EID Parry manufacturing facility without complying with requisite safety precautions and procedures.

4.3 Culture of Openness

- a. Don't promote hierarchical differences as hindrances for open communication.

4.4 Use of EID Parry's Assets

- a. Don't use EID Parry's IT or communication assets for promoting discriminatory, offensive, defamatory, or threatening messages or downloading and viewing pornographic material or for sharing EID Parry's confidential and proprietary information, trade secrets, IPR etc.
- b. Don't destroy information belonging to EID Parry or carry EID Parry's proprietary assets, training material provided by the company, software installations or packages, and any other such material at the time of termination of employment with EID Parry.
- c. Don't cause security breaches in computers, laptop, networks, websites, and other hardware and software applications.
- d. Don't use unauthorised software in EID Parry's IT resources.

Responsibility

We are responsible corporate citizens. We believe we can help make a difference to our environment and change lives for the better. We will do this in a manner that befits our size and reflects our humility.





Responsibility

5.1 Corporate Governance

- a. EID Parry is committed to serve the best interest of shareholders and enhance shareholder value by protecting their investments and providing consistent growth and fair rate of return on their investment.

5.2 Stakeholder Governance

- a. EID Parry is committed to carry out its operations and activities without unfavourably impacting the environment and progress towards a sustainable future.
- b. As employees of EID Parry, it is important to entrench ESG⁷ principles and the United Nations Sustainable Development Goals (UN SDG)⁸ into practice by integrating the same in every aspect of Company's operation and business strategy.

⁷ESG means "environmental, social and governance". It is a framework used to assess an organisation's business practices and performance on various sustainability and ethical issues and helps stakeholders understand how an organisation is managing risks and opportunities related to environmental, social, and governance criteria. Investors, regulators, as well as consumers and employees expect that companies should not only be good stewards of capital but also of natural and social capital and have the necessary governance framework in place.

Environmental

The main issues reported under Environment are greenhouse gases emissions and air, water, and ground pollution. Whether a company uses virgin or recycled materials in its production processes and how a company ensures that from cradle to grave the maximum material in their product is cycled back into the economy rather than ending up in a landfill.

Social

Under the Social Pillar companies are expected to report on how they manage their employee development and labour practices, safety and quality of their product, supply chain labour, and health and safety standards.

Governance

The main issues reported under the Governance Pillar are shareholders rights, board diversity, executives compensation and how it is aligned with the company's sustainability performance and includes matters of corporate behaviour such as anti-competitive practices and corruption.

⁸(UN SDG)

The Sustainable Development Goals (SDGs), also known as the Global Goals, adopted by the United Nations in 2015 are a collection of seventeen interlinked objectives designed to serve as a shared blueprint for peace and prosperity for people and the planet, now and into the future. The SDGs are a call for action by all countries – poor, rich, and middle-income – to promote prosperity while protecting the planet.



5.3 Public Representation and Response to Media Queries

- a. Only specifically authorised directors and employees shall disclose Company and business information to public constituencies such as media, financial community and shareholders.
- b. Any Company Press Release should go only from the desk of the Managing Director/CEO, or any person authorised by him/her.

5.4 Endeavour to Further National/Societal Interests

- a. EID Parry is committed in all its activities to benefit the economic development of the nation in which it operates and strives to make a positive contribution to the achievement of objectives and priorities of the Nation.

5.5 Concern for Environment Reflected in Product and Packaging

- a. Continuously endeavour to develop new and enhanced products without unfavourably impacting the environment.
- b. Use, wherever practicable, product-packaging material that is eco-friendly, recyclable, or biodegradable.

5.6 Concern for Environment Reflected in Managing Manufacturing Facilities

- a. EID Parry's facilities should have a defined Safety, Health, and Environment (SHE) policy and adhere to statutory norms, and comply with practices as per prevailing standards is mandatory.
- b. The effluents and stack emissions from the manufacturing processes at all our facilities should comply with the respective Pollution Control Board (PCB) norms for environment, including air, water, and land etc., and where specifications are not defined, internal specifications both upon National/International Standards should be developed and complied.
- c. Prevent wasteful use of natural resources and ensure safe disposal of all hazardous waste and communicate with all local communities the environmental safety of our operations.
- d. Make efforts to improve energy efficiency in existing operations and in new equipment and facilities.
- e. Make efforts to reduce Green House Gases (GHG) emission.
- f. Make efforts to use only Renewable Energy.



Do's

Responsibility

5.7 Concern for Environment Reflected in Business/Workplace Decisions

- a. Regularly evaluate the environmental, safety and health conditions at all offices and manufacturing facilities.
- b. The top management should review all existing and potential SHE issues before making any acquisitions or entering into joint ventures.
- c. Use, wherever possible, recyclable, or biodegradable office accessories, furniture, and stationery such as printing paper, cups, notebooks, carpets etc.

5.8 Avoid Conflict of Interest of Employee and EID Parry's Interests Industry Acquaintance

- a. If any of your relative is a competitor or a value chain partner of EID Parry or is employed by one, then such situations should be reviewed with the respective Functional Head in consultation with the Head HR to assess the nature and extent of any conflicts and how they can be resolved.
- b. Notify and obtain approval from Functional Head/Managing Director/CEO before doing transactions/business or making any decisions on EID Parry's behalf with any company, value chain partner, or competitor in which you or your immediate relative may in any way benefit from such actions.
- c. Engage with all value chain partners to have a defined SHE policy and for adhering to statutory norms, compliance with ESG Practices as per prevailing National standards.



5.9 Protect EID Parry's Trade Secrets and Proprietary Information

- a. Maintain the confidentiality of all proprietary information⁹ and trade secrets,¹⁰ whether patented or not, that gives EID Parry an opportunity to obtain an advantage over competitors.
- b. Enter into a confidentiality agreement, when disclosing any proprietary/confidential information or trade secrets to customers, vendors, value chain partners, consultants, service providers, or joint venture participants, to maintain secrecy of all such information.
- c. Ex-EID Parry employees are required to protect all proprietary information or trade secrets till such information comes into the public domain.

Illustrative Examples of Information that Qualify as Proprietary Information:

Business

Potential Merger, Acquisition, Expansion or Divestment Plans, Business Restructuring Plans, Business Plan, Balanced Scorecard, Policy Deployment charts of employees, Annual Budgetary Estimates, Sales Projections, Raw Material Costs, Supplier and Customer information, SAP Reports, and Copyright Documents.

Financial

Capital expenditures, raising or buying back equity capital, issuing/retiring debt, cost structures, profits, earnings and proposed dividends.

⁹Proprietary information - Material and information such as trade secrets, confidential commercial, or financial information associated with a company's products, business, or activities, on which the company/management has property right and have been marked as 'company confidential information'.

¹⁰Trade Secrets - All forms and types of financial, business, scientific, technical, economic, or engineering information, whether tangible or intangible, and whether or how stored or compiled, if it is kept secret by the owner and derives independent economic value from not being generally known and not ascertainable through proper means.



Do's

Responsibility

Sales/Marketing

New product developments, proposed promotion and advertising campaigns, product launch, marketing and distribution strategies, dealer policies, market research data, customer requirement/preferences and personal information, product pricing information.

Production

Plant design, Input parameters, R&D reports, product formulas, in-house production improvements.

Patents

All unpublished product/process/material patent data.

5.10 Steps to be taken to Preserve Information Confidentiality (Illustrative)

- a. Ensure all confidential documents on our desk are covered or locked before we leave our workstation.
- b. Shred sensitive documents that are no longer needed.
- c. Erase whiteboards in conference rooms after the meeting is over.
- d. Label extremely confidential documents as 'Confidential - EID Parry Proprietary Information' and keep a central record of all such 'confidential' marked documents. Computer disks containing confidential information should be treated with the same degree of care as confidential papers.
- e. Lock computer/laptop before leaving workstation. Confidential information should be kept password protected.

5.11 Cooperation with other Murugappa Group Companies

- a. Cooperate with other Murugappa Group Companies by sharing physical, human, and management resources as per prevailing Company Policy from time to time.
- b. Ensure that the business decisions and strategies of EID Parry and our actions and activities are in harmony and not in conflict with Murugappa Group's business interests.
- c. Give preference to other Group Companies for procurement and selling of products and services, if the terms are competitive, relative to third parties and comply with the statutory provisions relating to Related Party Transaction as enunciated under the Companies Act, 2013 and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.



Don'ts

Responsibility

5.1 Public Representation and Response to Media Queries Including Social Media

- a. Don't entertain any requests for data or queries regarding Financial or Business information, which is not publicly available, from print or electronic media or financial community. Refer such queries to the Chief Financial Officer/Company Secretary/Managing Director.
- b. Don't agree for interviews in print and electronic media relating to EID Parry without informing the Chief Financial Officer/Company Secretary/ Managing Director.

5.2 National/Societal Interests

- a. Don't engage in any activity or undertake any project that would be detrimental to the nation's interests, or have an adverse impact on the social and cultural life patterns of its citizens.
- b. Don't use child labour for any activity within the Company.

5.3 Business/Workplace Decisions Affecting Environment

- a. Don't waste natural and scarce resources such as water, electricity, paper, food, etc.
- b. Don't litter the office environment and ensure clean office surroundings.

5.4 Conflict of Interest of Employee and EID Parry's Interests

- a. Don't engage in any business, relationship, association, or activity which is detrimental or conflicts or appears to conflict with the best interest of the Company.

5.5 Work Ethics and Competing Against EID Parry

- a. Don't agree to do any work for any organisation including a competing organisation, while still in employment, without the approval of EID Parry.

5.6 Employee and Supplier Hats

- a. Don't be a value chain partner to EID Parry or represent a value chain partner to EID Parry while you are an employee of EID Parry.
- b. Don't work for a value chain partner or a customer while working for EID Parry (does not include secondments), or provide any assistance to any value chain partner even after work hours that may adversely affect your performance or judgment on the job.



Don'ts

Responsibility

5.7 Financial Interests and Investments

- a. Don't buy shares of Group Companies without taking prior approval of the Company in accordance with the code before buying the shares.

5.8 EID Parry's Trade Secrets and Proprietary Information

- a. Don't use EID Parry's proprietary information for own benefit or disclose it to outsiders.
- b. Don't carry any printed documents or records carrying such proprietary information at/after the time of termination of your association with EID Parry.
- c. Don't share or provide proprietary information/trade secrets of EID Parry to competition in the event of leaving EID Parry and joining competition, till the time the information comes into public domain.

5.9 Steps to be taken to Preserve Information Confidentiality (Illustrative)

- a. Don't discuss confidential documents over speakerphone or in public places.
- b. Don't discuss EID Parry's proprietary information with family members, relatives, or social acquaintances.
- c. Don't take part in any survey, data collection, or benchmarking exercise without the approval of the Functional Head.
- d. Don't leave documents and other material unattended in conference rooms.
- e. Don't retain confidential documents with you after the work is over, or provide them to third parties in the absence of a written confidentiality agreement.
- f. Don't share computer password with others outside workgroup unless required.
- g. Don't share confidential information without entering into a confidentiality agreement.

Making a Positive Impact

“Our code of conduct is definitive; it is not negotiable.”

Thomas S. Monson

The matters covered in this Guide to Business Conduct are of utmost importance to our Company, shareholders, value chain partners, and essential to the conduct of our business. We expect all our employees to adhere to this Guide to Business Conduct in carrying out their duties and responsibilities. Business Ethics plays a significant role in making better business decisions, improves relationships with employees, improves the goodwill of the business, plays an important role in the protection of society, helps in increasing business profitability, safeguards interest of the industry, helps in making a positive impression in the market and protects consumer rights.

It is also pertinent to note that as a Company, we are absolutely committed to upholding the principles outlined in the National Guidelines on Responsible Business Conduct (NGRBC) and Business Responsibility and Sustainability in both substance and spirit. The first principle of NGRBC and Business Responsibility and Sustainability being that “businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.”

We take violations of the Guide to Business Conduct seriously and where appropriate, the Company will take corrective or disciplinary action, up to and including termination of employment. We urge all our employees and officers to take time to read the Code and appreciate the principles enshrined in this Guide to Business Conduct, use them to guide your behaviour in serving the best interests of the Company and its stakeholders.

Ultimately, the Company's reputation depends on the extent to which we demonstrate integrity and live up to the values and beliefs. Each of us serve as an ethical role model in everything we do and say, and the Company expects each employee to strive to create a positive work environment by imbibing our values and beliefs.

Notes

This image shows a full page of white paper with horizontal dashed lines. The lines are evenly spaced and run across the entire width of the page, providing a guide for handwriting practice. There are no margins, text, or other markings on the paper.

The Spirit of the Murugappa Group

Integrity

Responsibility

Passion

The five lights

The values, principles and beliefs that have
always guided us and continue to show the way forward.

Respect

Quality



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