



E.I.D. - Parry (India) Limited

Regd. Office: Dare House, 234, N.S.C. Bose Road, Parrys Corner, Chennai- 600 001, India.

Tel: 91 44 25306789 Fax: 91 44 25341609 / 25340858

CIN: L24211TN1975PLC006989

Website: www.eidparry.com

PARRYS CODE OF CONDUCT

Parry's 'Code of Conduct' is applicable to all employees of EID Parry (India) Ltd. ('Parry') and its wholly owned subsidiaries.

Parry's Code of Conduct has been in operation for many decades and the same is communicated to the employees and posted in the company's website. The framework of the code is derived from the three fundamental principles viz., Good Corporate Citizenship, Corporate Governance and Good Personal Conduct.

Parry is a professionally managed organization and the core values enshrined in the Five Lights of its corporate philosophy namely, Integrity, Passion, Quality, Respect & Responsibility. While the first two values fundamentally address who you are, the third and fourth address how you work and the fifth how you relate to the environment. It is therefore our responsibility to ensure that the organization is managed by these values in a manner that protects the interest of the stakeholders. It is also our belief that in order to serve the interest of the stakeholder, we should build Parry as an Institution on the core values.

A. GOOD CORPORATE CITIZENSHIP

In the conduct of the Company's business, the fundamental practice of good corporate citizenship is a prerequisite which embraces the following:

- In dealing with employees and stakeholders, one shall uphold the values which are at the core. These values form the basis of engagement in the organization. Parry will focus on meritocracy, equity and upholding of the core values in all the people processes including performance management systems, reward and recognition.
- Prevention of Sexual Harassment – Parry is committed to a gender free workplace. It seeks to enhance equal opportunities for men and women, prevent, stop and redress sexual harassment at work place. Parry demands its team members to demonstrate and promote professional behavior and respect for all employees.
- Relationship with Suppliers & Customers – All employees shall ensure that in dealing with the suppliers and customers, company's interests are never compromised. Accepting gifts and presents of more than nominal value from customers / suppliers will be viewed seriously as it could lead to compromising on company's interest
- Health & Safety – Parry gives great importance to health and safety of its employees. The company is committed to a safe work environment and in providing a good working condition with high standards of hygiene and housekeeping. Comprehensive training is provided to employees to increase awareness on safe working methods and ensure adherence to safety standards.
- Environment Policy – Parry believes in complying with all environmental standards by law and regulation. We believe that in our business, we must establish procedures for assessing the environmental impact of our present and future activities and adopt the best practices and standards.



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B. PERSONAL CONDUCT

1. Leading by example – The employee should set a high standard both in his words and actions, since these together depict the organization's behavior. Parry expects its employees to discharge their roles with passion and integrity.
2. Avoidance of conflict of interest - All employees must avoid situations in which their personal interest could conflict with the interest of the company. This is an area where it is impossible to provide comprehensive guidance but the guiding principle is to prevent the conflict if any.
3. Protection of confidential information – No employee shall at any time during his /her employment in the company or thereafter, divulge or disclose, directly or indirectly any sensitive information in respect of any business or operations of the Company, the products, drawings, plans, process, data, formula, or secret method which he / she may have invented, acquired or learned during the course of employment in the company. The employee agrees to (i) hold such confidential information received from the Company in strict confidence and shall exercise a reasonable degree of care to prevent disclosure to others; and (ii) upon the request or upon termination of his/her relationship with the Company, deliver to the Company any drawings, notes, documents, equipment, and materials received from Company or originating from its activities for the Company.
4. The employee shall comply with the data protection policy of the Company, as applicable from time to time, when handling personal data in the course of employment. The employee acknowledges that the Company will process data relating to the employee for a variety of purposes and that this may include sensitive personal data relating to the employee.
5. Part time employment outside Parry – As an employee one shall not directly or indirectly hold any office of profit outside the company without the written permission of the management.
6. Attendance, Punctuality & Orderliness at workplace - Employees at the factories / Branch / Head Office are required to punch their cards for their daily attendance. If the employee does not mark the attendance for any particular day, he/she will be marked absent. Employees are required to be on time at their respective work place. Frequent late coming will affect the performance and hence the career of an employee. All employees are prohibited from reporting to work under the influence of alcohol, chemicals & drugs, Banned Tobacco products which impairs one's ability to perform a normal work activity.
7. Transparency – All employees shall ensure that their actions in the context of the business are ethical and totally transparent. Such transparency shall be brought through appropriate policies, systems and practices including as appropriate,



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segregation of duties, tiered approval mechanism and involvement of more than one manager in key decisions and maintaining supporting records. It shall be necessary to voluntarily ensure that areas of operation are open to audit and the conduct of activities is totally auditable.

C. CORPORATE GOVERNANCE

Maintaining highest standard of Corporate Governance is the guiding conduct of the company affairs. It clearly delineates the roles, responsibilities and authorities of the governance structures. The Code of Conduct forms an integral part of the Governance policy. All employees are advised to adhere to the same.

1. Respect - Company respects the rights and dignity of every individual and aims to establish clear values and objectives so that all employees understand and are committed to the aims of the Company and clearly see their roles within it. It is expected that all employees in the Company treat people they interact with, both within and outside the company, with respect and in a manner that their self esteem and dignity are maintained at all times.
2. Legal & Statutory compliance - It is the Company's policy to comply fully with all applicable laws and regulations of the country of incorporation as well as the respective jurisdictions wherever the Company operates. Ensuring legal and regulatory compliance is the responsibility of the Head of the Businesses and all employees of the Company shall strictly comply with all applicable laws. In case of any doubt, the employees will promptly consult the Head of Compliance or Legal Department. The Company cannot accept practices which are unlawful or may be damaging to its reputation. Management Committees must satisfy themselves that sound and adequate arrangements exist to ensure that they comply with the legal and regulatory requirements impacting each business and identify and respond to developments in the regulatory environment in which they operate. In the event the implication of any law is not clear, the Company's Legal Department shall be consulted for advice.
3. Protecting company assets and data - Protecting the Company's assets is a key responsibility of every employee. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others, or sold or donated or mortgaged. Employees may not use Company assets for personal use, nor may they allow any other person to use Company assets. Every Employee undertakes not to take any information and data belonging to the Company after cessation of his/ her employment and any such use of Company's information or data whether during the employment or after cessation of employment for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited.
4. Every employee shall refrain from dealing in the securities of the Company except in accordance with the Company's code for prohibition of insider trading.
5. Every employee acknowledge that he/she will be bound by all the Company's policies, standard operating procedures (SOPs) and code of conduct as may



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be in force from time to time and agrees to adhere to and promote adherence to the aforesaid policies, SOPs and code of conduct, and to inform the employer of any incidents and activities in violation of such policies.

6. Reporting concerns - Every employee of the company shall promptly report to the Ombudsman of the group, when she / he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanour or act not in the company's interest. Such reporting shall be made available to suppliers and partners, too. An employee can choose to make a protected disclosure under the whistleblower policy of the company, providing for reporting to the Ombudsman. Such a protected disclosure shall be forwarded, when there is reasonable evidence to conclude that a violation is possible or has taken place, with a covering letter, which shall bear the identity of the whistleblower. The company shall ensure protection to the whistleblower and any attempts to intimidate him / her would be treated as a violation of the Code.

Non-adherence – Any instance of non-adherence of the Code of Conduct or any other observed unethical behavior on the part of the employee covered under the Code of Conduct should be brought to the immediate attention of the Reporting Officer who shall report the same to the Head of Human Resources for necessary action.



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