<u>Corporate Citizenship</u> (CSR)

A RR Global company shall be committed to be a good corporate citizen not only in compliance with all relevant laws and regulations but proactively assisting in the improvement of the quality of life of the people in the communities in which it operates. Areas where active intervention is being initiated are in the field of community health & family welfare, water management, vocational training, education and literacy, encourage incorporation & application of modern scientific and managerial techniques and expertise.

The company would also not treat these activities as optional ones, but would strive to incorporate them as an integral part of its business plan. The company would also encourage volunteering amongst its employees and help them to work in the communities. RR Global companies are encouraged to develop social accounting systems and to carry out social audit of their operations at respective manufacturing locations.

Cooperation of RR Global Companies

A RR Global company shall cooperate with other RR Global companies by sharing physical, human and management resources as long as this does not adversely affect its business interests and shareholder value.

In the procurement of products and services, a RR Global company shall give preference to another RR Global company as long as it can provide these on competitive terms relative to third parties.

Public Representation of the Company and the Group

A RR Global company honors the information requirements of the public and its stakeholders. In all its public appearances, with respect to disclosing company and business information to public constituencies such as the media, the financial community, employees and shareholders, a RR Global company or the RR Global Group shall be represented only by specifically authorized directors and employees. It will be the sole responsibility of these authorized representatives to disclose information on the company.

Use of the RR Global Brand

The use of the RR Global name and trademark owned by RR Global shall be governed by manuals, codes and agreements issued by RR Global. The use of the RR Global brand is defined in and regulated by the RR Global - Brand Manual.

Ethical Conduct

Every employee of a RR Global company, which shall include whole-time Directors and the Managing Director, shall deal on behalf of the company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be such by third parties.

Every employee shall be responsible for the implementation of and compliance with the code in his professional environment. Failure to adhere to the code could attract the most severe consequences including termination of employment.

Regulatory Compliance

Every employee of a RR Global company shall, in his business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which he operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the code, then the standards outlined in Ratna Path shall prevail.

Concurrent Employment

An employee of a RR Global company shall not, without the prior approval of the Managing Director of the company, accept employment or a position of responsibility in any other organization or provide freelance / honorary services.

Conflict of Interest

An employee of a RR Global company shall not engage in any business, relationship or activity, which might detrimentally conflict with the interest of his company or the group. A conflict of interest, actual or potential, may arise where, directly or indirectly,

- (a) An employee of a RR Global company engages in a business, relationship or activity with anyone who is party to a transaction with his company,
- (b) An employee is in a position to derive a personal benefit or a benefit to any of his relatives by making or influencing decisions relating to any transaction, and
- (c) An independent judgment of the company's or group's best interest cannot be exercised. The main areas of such actual or potential conflicts of interest would include the following:
 - Financial interest of an employee of a RR Global company or his relatives including the holding of an
 investment in the subscribed share capital of any company or a share in any firm which is an actual or
 potential competitor, supplier, customer, distributor, joint venture or other alliance partner of the RR

- Global company. (The ownership of up to 1% of the subscribed share capital of a publicly held company shall not ordinarily constitute a financial interest for this purpose.)
- An employee of a RR Global company conducting business on behalf of his company or being in a position
 to influence a decision with regard to his company's business with a supplier or customer of which his
 relative is a principal, officer or representative, resulting in a benefit to him or his relative.
- Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of a RR Global company where such an individual is in a position to influence the decision with regard to such benefits.
- Acceptance of gifts, donations, hospitality and/or entertainment beyond the customary level from
 existing or potential suppliers, customers or other third parties which have business dealings with the
 company.

Notwithstanding that such or other instances of conflict of interest exist due to any historical reasons, adequate and full disclosure by the interested employees should be made to the company's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, which would include parents, spouse and children, may have in a company or firm which is a supplier, customer, distributor of or has other business dealings with his company.

Every employee who is required to make a disclosure as mentioned above shall do so, in writing, to his immediate superior who shall forward the information along with his comments to the person designated for this purpose by the MD.

If an employee fails to make a disclosure as required herein and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management would take a serious view of the matter and consider suitable disciplinary action against the employee.

Protecting Company Assets

The assets of a RR Global company should not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.