



CODE OF
BUSINESS CONDUCT
TEGA INDUSTRIES LIMITED
and it's **Subsidiaries**

SEPTEMBER 2025



**MESSAGE FROM
MANAGING DIRECTOR
& GROUP CEO**

Dear Colleagues,

We have earned a worldwide reputation for conducting our business with integrity and with respect for all those with whom we transact. To maintain this reputation, it requires the highest standards of behaviour to be consistently observed by all of us. This Code of Business Conduct (the “Code”) intends to clarify the standards of acceptable behaviour in Tega Industries Limited, its Subsidiaries, and all joint ventures under its control (the “Tega Group”). Being a successful business does not just mean investing in growth and balancing short- and long-term interests. It also means caring about our consumers, employees, shareholders, investors, business partners, and the community in which we operate. We therefore want this Code to be more than a collection of magniloquent statements. It must have practical value in our daily conduct and each of us must follow these principles; both in letter and spirit. Acting with integrity means ‘consistently doing the right thing’, in compliance with our Code. This will ensure better performance of our business as well as our professional lives. Each employee must act with integrity. Each one of us is accountable for compliance. This is our commitment to all our stakeholders including our customers, suppliers, and colleagues globally. Should you have any questions or uncertainties regarding this Code, I encourage you to clarify your concerns with your line manager for guidance. We are all responsible for the reputation of the Tega Group, and I believe you will contribute to maintaining our standards.

Best Regards,

Mehul Mohanka
Managing Director & Group CEO





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INTRODUCTION

All companies in the Tega Group will conduct their business with responsibility, integrity, fairness, and transparency. The purpose of this Code is to lay out a broad policy, for all employees of Tega Industries Limited (the “Company”) and its Subsidiaries while discharging their duties and responsibilities, in all their interactions, internal and external, to promote healthy business practices in an efficient, professional, and ethical manner.

This Code applies to Directors and all employees across companies within the Tega Group. All individuals, including service providers, subcontractors, and business partners, are expected to adhere to our Code when engaging with us, representing us, or acting on our behalf.





CODE OF BUSINESS CONDUCT



WORKPLACE INTEGRITY

- Environment, Health and Safety
- Diversity, fairness and respect
- Equal Opportunities Employer
- Protecting Company Assets
- Information systems, email and social media



BUSINESS PRACTICED INTEGRITY

- Financial Reporting and Records: Accurate Recording and Reporting
- Anti-Bribery and Anti-Corruption Policy
- Conflicts of Interest
- Insider trading
- Prevention of Money Laundering
- Quality of Products and Services
- Public Representation of the Company and the Group



INTEGRITY IN THE COMMUNITY

- Human Rights
- Respect for Local Communities
- Political non-alignment
- Supplier and Contractor Responsibility
- Environment



I.1. NATIONAL INTEREST

All companies in the Group shall be committed in all their actions to benefit the economic development of the countries in which they operate and shall not engage in any activity that would adversely affect such objective. A company in the Tega Group shall conduct its business affairs in accordance with the economic, development, and foreign policies, objectives, and priorities of the nation's government. All companies in the Group are committed to maintaining the highest ethical and value standards in the process of corporate governance and ensuring compliance with all laws of the land. We are committed to providing timely, accurate, and complete information, as necessary to all concerned, including its stakeholders.

I.2. ENVIRONMENT, HEALTH AND SAFETY

We strive to create a healthy and safe environment for our employees, contractors, customers, and stakeholders. Our objective is to prevent any injuries while working with or for us, striving for zero harm. Achieving this goal stipulates the commitment of every individual. We ensure that every employee understands what she or he is accountable for, and what support they can rely on to achieve success. We aim to cultivate a culture of personal and collective accountability for Health and Safety (H&S), integrating it into every aspect of our business processes. Health and Safety are our core values. All companies in the Tega Group shall strive to provide a safe and healthy working environment and comply, in the conduct of their business affairs, with all regulations regarding the preservation of the environment of the territory in which it operates. All companies in the group shall be committed to preventing the wasteful use of natural resources and minimize any hazardous impact of the development, production, use, and disposal of any of its products and services on the ecological environment.



I.3. DIVERSITY, FAIRNESS, AND RESPECT

Tega is fortunate to have an incredibly diverse workforce. We believe we have a responsibility to treat each other with dignity, which means appreciating diversity, whether that diversity exists because of race, religion, gender, sexual orientation, or any other difference. By embracing differences, we broaden our understanding of different perspectives and unleash our collective strength of who we can be at Tega. . Thus, we value and promote a workplace that is inclusive and fair, and that fosters respect for all our fellow employees, customers, and business partners. We are committed to cultivating an environment that upholds personal dignity, privacy, freedom of association, collective bargaining, and the individual rights and safety of every person as integral aspects of our daily work experience We have a zero-tolerance policy for threats or acts of violence. To maintain a work environment free from violence, abusive behaviour, or intimidation, all employees must demonstrate courtesy and respect, on company property and in all business-related interactions, including with customers and members of the community. Adherence to professional standards is mandatory at all times.

I.4. EQUAL OPPORTUNITIES EMPLOYER

All companies within the Group shall provide equal opportunities to all employees and eligible and/or qualified applicants for employment. We value diversity and recruit, develop, and promote individuals without discrimination based on race, caste, religion, colour, ancestry, marital status, sex, age, nationality, disability, or veteran status. Employee policies and practices shall be administered in a manner ensuring that in all matters equal opportunity is provided to those eligible and the decisions are merit-based.

All employees shall be treated with dignity and by the policy to maintain a work environment free of sexual harassment, gender biasedness, and discrimination. Harassment includes unwelcomed physical contact, obscene verbal remarks or texts, derogatory comments, discriminatory comments, intimidation, or any conduct that creates a hostile or offensive work environment.





The Company has a Zero Tolerance policy towards Sexual Harassment. We have in place a policy framed under Indian Laws under the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”. As a Group with a global presence, we follow the location-specific Sexual Harassment laws for the entity where we operate in. This is further elaborated in our standalone Prevention of Sexual Harassment (POSH) Policy document, which must be referred to for complete details and compliance requirements.



1.5. PROTECTING COMPANY ASSETS

Use of the TEGA Brand: The use of the TEGA name and trademark owned by the Company shall be governed by manuals, codes, and agreements issued by the Company. The assets of all companies in the Group should not be misused but utilized to conduct the business for which they are duly authorized for. These include tangible assets such as equipment and machinery, infrastructure, facilities, materials, and resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.

All employees are responsible for protecting our Company's assets and using good judgment to ensure that physical and intellectual property as well as financial assets are not damaged, stolen, misused, or wasted. Protecting physical assets, such as equipment, materials, and facilities, is instrumental to performing our day-to-day jobs. As employees of Tega, each of us has assumed responsibility for these assets and must safeguard them from theft, loss, misuse, and waste. In addition, we must make sure that all resources are used for appropriate business purposes.

Protecting Proprietary Assets: At the Company, we regularly produce valuable, non-public ideas, strategies, and other kinds of business information, which we own and need to protect as intellectual property. Such information is a large part of what we derive our competitive advantage from. Improper disclosure of such information is prohibited, and we must be mindful of the risks of improper disclosure of confidential information.

Employee and Third-party Confidential Information: Access to prospective, current, or former employee records and personal data, including performance evaluations, salary, pension, and benefits, is only permitted to persons with proper authority and by data privacy laws. In addition, we are responsible for protecting confidential information entrusted to us by our customers, suppliers, and other business partners as carefully as we protect our information.

1.6. INFORMATION SYSTEMS, EMAIL, AND SOCIAL MEDIA

Technology in the workplace enables us to serve our customers even more efficiently. We rely on it to support our processes and interactions around the globe. Internet access, email and other applications are provided for business purposes. All business communication and collaboration internally with other Tega employees and external third parties must be done using the Company's approved electronic communications and email accounts. In sending and receiving email communications and attachments you must apply the same standards of care as used in hard copy communications.

It is prohibited to disclose externally (including to press, investors or otherwise) or post to social media sites, internal Tega/Company's information, or communications without authorization. You must not abuse the "Company's IT systems", Internet access, email accounts, or any other information and communication media for illegal or unethical purposes. Searching, downloading, or forwarding information that is abusive, or offensive may lead to disciplinary measures. You must also be aware that you are not allowed to use or copy software or data from the "Company's IT systems" for private purposes unless explicitly authorized by the IT department. Social media allows us to communicate instantly and widely. You must follow the company's social media policy before disseminating images or text involving your work colleagues or workplace. Unforeseen consequences could include damage to the reputations of Individuals or the Company. The detailed guidelines issued as per the Company's IT policy are required to be followed at all times.





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BUSINESS PRACTICES INTEGRITY

2.1. RECORDING AND REPORTING

All companies in the Group shall prepare and maintain their accounts fairly and accurately, in accordance with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws, and regulations of the country in which the entity conducts its business in.



Internal accounting and audit procedures shall fairly and accurately reflect all the business transactions and disposition of assets. All required information shall be accessible to Company auditors and other authorized parties and government agencies. There shall be no willful omissions of any Company transactions from the books and records, no advance income recognition, and no hidden bank account and funds. Any willful material misrepresentation of and/or misinformation on the financial accounts and reports shall be regarded as a violation of the code, apart from inviting appropriate civil or criminal action under the relevant laws.

In all our dealings and every form of communication, we are accurate and truthful. This is what is expected of us in all our relationships with investors, customers, employees, and business partners, as well as with the public and all government offices. Falsification or improper alterations of records is prohibited. You must never instruct someone else to prepare or approve a false or misleading record or to do so yourself at the direction of another person. When preparing records, we must all act with integrity so that information is not incorrectly withheld, incomplete, or misleading.

2.2. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

We are committed to conducting business with integrity and in compliance with all applicable laws and regulations. We commit to supporting and enabling the healthy growth of communities in which we operate. We see this as a fundamental duty that comes with the license to operate. Abiding by the rule of law and setting an example of how to conduct ethical business is one of the many ways for us to put this commitment into action. We recognize that paying bribes, regardless of their size, is never acceptable in business. Bribery in any form contradicts the culture of integrity at Tega and is not sustainable. We are committed to complying with international anti-corruption laws in all our global operations.

It is not acceptable to offer, give, authorize, or receive any form of bribe or kickback, including any public official or private entity. We do not engage or authorize third parties to perform actions that we ourselves are prohibited from undertaking, such as offering or paying bribes. Third parties acting on behalf of us must therefore never give or receive bribes. The term “third parties” can include consultants, subcontractors, franchisees, sales agents, resellers, customs brokers, accounting or law firms, or companies that assist with obtaining visas, permits, or inspection certificates, and joint venture partners.

We have established guidelines and procedures to prevent bribery and corrupt practices within our organization related to the manufacturing of metal and rubber-based mining products. All employees, directors, officers, and business partners are expected to comply with this policy and refrain from engaging in any form of bribery.

Compliance with Anti-Bribery Laws:

The Company will comply with all applicable anti-bribery laws and regulations, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Employees, directors, officers, and business partners must familiarize themselves with the relevant laws and comply with their provisions.

Reporting Bribery Concerns:

Employees must report any suspected or actual instances of bribery or corrupt practices to their immediate supervisor, the Compliance Officer, or through a designated whistleblowing channel. The Company will protect whistleblowers from retaliation and maintain confidentiality to the extent permitted by law. The Company will promptly and thoroughly investigate any reports or suspicions of bribery or corrupt practices. If allegations are substantiated, appropriate disciplinary action will be taken, which may include termination of employment or the termination of business relationships.

2.3. GIFTS, HOSPITALITY, AND ENTERTAINMENT

If the gift is anonymous, the recipient must deliver the gift to the HR Head, who will decide its usage or disposal in consultation with the Compliance Officer. For clarity “Gift” includes any item, benefit, or gesture (of value or not) to employees and/or their families.

At Tega, all employees (including all permanent, part-time, temporary, and contract employees) will abide by the ‘No Gift’ Policy of the organization. Violation of the No Gift policy will subject an employee to disciplinary action, including termination from employment. Employees are encouraged to inform vendors, potential vendors, and others about the no-gift policy. Upon being offered a gift prohibited by this policy, an employee must notify the gift giver of this policy and graciously decline or return the gift.

Gifts include but are not limited to the following:

- 1 Bestowal of money
- 2 Any item of value
- 3 Loan
- 4 Thing or promise
- 5 Service (eg., Hospitality such as free hotel rooms)



-  6 Payments for travel, entertainment, food etc.
-  7 Any sort of personal advantage like employment or business opportunity for the family, relatives, or friends in your companies/firms
-  8 Business courtesy offered such as a product discount or rebate on the price of anything of value or any other benefit extended.

We believe that strong business relationships are founded on trust and mutual respect, reflecting the value we place on our customers and business partners. Gifts to third parties including Government officials (including employees at all levels) must be guided by the company's policies and directives in this regard.

Gifts of cash and cash equivalents are strictly prohibited. Employees may be given Tega-branded promotional items in moderation to third parties. In case of any ambiguity about the gifting policy, one may consult with the compliance officer. All gifts and hospitality if offered, or provided on behalf of the Company must be properly reflected in the Company's books and records and duly approved by the Managing Director.

Hospitality:

Hospitality includes meals and refreshments, as well as cultural, entertainment, or sporting events where at least one Tega's employee acts as a host and attends. If no Tega employee is attending, then the hospitality is a "gift" and subject to the rules on gifts.

Donations:

Tega employees shall neither receive nor offer or make, directly or indirectly, donations or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favours for the conduct of its business. Any donation made by the Company shall be as per the prevailing law of the land and with prior written approval of the Managing Director.

2.4. COMPETITION

We are committed to fair and transparent competition, and we comply with all relevant competition laws. All companies within the Group are committed to supporting and advancing a competitive, open market economy in every country and market where we operate. We will actively cooperate in efforts to promote the progressive and responsible liberalization of trade and investment by each nation.

A company in the Group shall not engage in activities that generate or support the formation of monopolies, dominant market positions, cartels, and similar unfair trade practices.

All companies in the Group shall market their products and services on their own merits and shall not make unfair and misleading statements about competitors' products and services. Any collection of competitive information shall be obtained only through legally permitted sources and means.

Employees must never directly or indirectly enter into agreements, understandings, or coordinate activities with actual or potential competitors to fix prices, premiums, or any specific elements thereof, limit or restrict the kind or quantity of products or services supplied, exchange competitively sensitive information or engage in any other behaviour that would otherwise limit competition in breach of applicable laws and regulations. Many forms of conduct may be subject to antitrust laws.



2.5. CONFLICTS OF INTEREST

We expect all our employees to act and make business decisions in the best interests of the Company, and they are required to do so without consideration of personal interests. Conflict of interest may arise when our interests interfere or may be perceived as interfering with our ability to perform our jobs effectively and fairly. Where we can, we avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing business on behalf of Tega Industries or any of the companies in Tega Group.

A conflict of interest could be any known activity, transaction, relationship, or service engaged in by an Employee, his/her immediate family (including parents, siblings, spouse, partner, and children), relatives, or a close personal relationship, which may cause concern (based upon an objective determination) that the Employee could not or might not be able to fairly perform his/her duties to our Company.

When encountering such relationships or activities that cannot be avoided, you must promptly disclose them to your supervisor, HR, or competent authority. Similarly, any personal interests that could be perceived as influencing the execution of your professional duties should be disclosed. When in doubt, disclosing such relationships or activities is in your best interest. Transparency often removes any perception of improper activity.



Taking employment, accepting a position of responsibility or running a business outside employment with our Company, in your own time, with or without remuneration, could interfere with your ability to work effectively at our Company or create conflicts of interest.

Any such activity must not be with any customer, supplier, distributor or competitor 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. Every employee who is required to disclose as mentioned above shall do so, in writing at the time of appointment, to HR or his immediate superior who shall forward the information along with his comments to the person designated for this purpose by the Managing Director, who in turn will place it before the Managing Director and/or the board of directors/executive committee appointed by the board and, upon a decision being taken in the matter, the employee concerned will be required to take necessary action as advised to resolve/avoid the conflict.

If an employee fails to disclose 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 will take a serious view of the matter and consider suitable disciplinary action against the employee after providing an opportunity for hearing (if necessary).

2.6. INSIDER TRADING

We support open and fair securities markets because they are key to building trust and investor confidence. Insider trading occurs when a Company's securities are traded while in possession of Unpublished Price Sensitive Information.

All employees of the Company and its subsidiaries shall ensure compliance with the Tega 'Code of Conduct to regulate, monitor and report trading by Designated Persons and their Immediate Relatives' and Tega 'Code of Practices and Procedures for Fair Disclosure or Unpublished Price Sensitive Information'. 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 and shall, ordinarily including but not restricted to, information relating to the following:

- 1 Periodical financial results of the Company
- 2 Intended declaration of dividends (both interim and final)
- 3 Change in capital structure
- 4 Issue of securities, buy-back of securities or any forfeiture of shares or change in market lot of the Company's shares
- 5 Acquisition, Merger, De-merger, Amalgamation, Restructuring, Scheme of arrangement or takeovers
- 6 Disposal, spin-off or selling division of whole or substantially whole of the undertaking
- 7 Any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company
- 8 Changes in Key Managerial Personnel; and other matters as may be prescribed by regulators/considered by the Managing Director / Wholetime Director / Compliance Officer / Chief Financial officer to be price sensitive from time to time



Violations of insider trading laws or this policy will result in disciplinary action, including potential termination of employment or legal consequences. The Company may also report suspected violations to relevant regulatory authorities for investigation and prosecution.

2.7. PREVENTION OF MONEY LAUNDERING

Tega is committed to preventing money laundering activities in all its operations related to the manufacturing of equipment & consumables for the mining, mineral processing, and material handling industries. We recognize the importance of maintaining the integrity of our financial systems and complying with all applicable anti-money laundering (AML) laws and regulations. A policy has been established with a framework and procedures to prevent and detect money laundering activities within our organization. We are committed to ensuring that our products and services will be used only for legitimate purposes with funds derived from legitimate sources.

2.8. QUALITY OF PRODUCTS AND SERVICES

All companies in the Group shall be committed and strive to supply goods and services of world-class quality that meet all applicable standards backed by efficient after-sales service consistent with the requirements of the customers to ensure their total satisfaction.

2.9. PUBLIC REPRESENTATION OF THE COMPANY & THE GROUP

All companies in the Group will honour 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 Company in the 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.

Third Parties that have business dealings with the Group but are not members of the group such as consultants, agents, sales representatives, distributors, contractors, suppliers, etc. shall not be authorized to represent any Company in the Group if their business conduct and ethics are known to be inconsistent with the code. The term “third parties” can include consultants, franchises, resellers, custom brokers, accounting or law firms, or companies that aid with obtaining visas, permits, or inspection certificates, and joint venture partners.

3

INTEGRITY IN THE COMMUNITY

3.1. HUMAN RIGHTS

Our Company is committed to upholding and respecting human rights in all aspects of our operations. We recognize the importance of promoting and protecting human rights and strive to ensure that our activities do not infringe upon the fundamental rights and dignity of individuals. This code of conduct along with the relevant section of our Business Responsibility & Sustainability Policy (BRSP) establishes our commitment to human rights and provides guidelines for our employees, contractors, and business partners. The company also respects the principles of international instruments, which are in line with the manual of the ILO conventions and recommendations.

This code of conduct along with the relevant section of our Business Responsibility & Sustainability Policy (BRSP) establishes our commitment to human rights and provides guidelines for our employees, contractors, and business partners. The company also respects the principles of international instruments, which are in line with the manual of the ILO conventions and recommendations.



Respect for Human Rights:

We respect and support the principles outlined in internationally recognized human rights instruments, such as the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We are committed to conducting our operations in a manner that respects and upholds the human rights of our employees, contractors, local communities, and other stakeholders.

Labour Standards and Fair Employment:

We adhere to fair labour practices and promote equal opportunities for all employees, regardless of their race, colour, gender, nationality, religion, age, disability, or other protected characteristics. We comply with all applicable labour laws and regulations, including those related to working hours, wages, benefits, and workplace health and safety.

Child Labour and Forced Labour:

We strictly prohibit the use of child labour and forced labour in any of our operations, including those of our contractors and suppliers. We conduct due diligence to ensure that our supply chain is free from child labour and forced labour, and we collaborate with suppliers to improve their labour practices.

Grievance Mechanisms:

We provide accessible and confidential grievance mechanisms for employees, contractors, and stakeholders to report any human rights concerns. We investigate and address grievances in a timely and fair manner, taking appropriate corrective actions as necessary.



3.2. RESPECT FOR LOCAL COMMUNITIES

We engage with local communities and strive to understand their needs and concerns. We respect the rights, traditions, and cultures of local communities, and we seek to minimize any adverse impacts our operations may have on their well being.

We contribute to the economic and social development of local communities through responsible business practices and community engagement initiatives.



3.3. POLITICAL NON-ALIGNMENT

We engage with governmental authorities with integrity, and we remain politically neutral. All companies in the Group are committed to and support a functioning democratic constitution and/or the duly appointed system with a transparent and fair electoral system in India and in the countries it operates. Any Company in the Tega Group shall not support directly or indirectly any specific political party or candidate for political office. The Company will not make any political contributions without due approval of the Board of Directors of the Company.

3.4. SUPPLIER AND CONTRACTOR RESPONSIBILITY

We expect our suppliers and contractors to adhere to the same human rights standards and principles as outlined in this policy. We collaborate with suppliers and contractors to promote ethical practices, including respect for human rights, fair labour, and responsible environmental & safety management.

3.5. ENVIRONMENT

As responsible corporate citizens, we are fully aware of our ongoing obligations and commitment to the environment, and the necessity for active engagement in protecting and enhancing our natural resources. We are dedicated to minimizing negative impacts and maximizing positive contributions to nature.

We are committed to protecting the environment in the countries where it conducts business, and to that end has developed policies with a strong focus on: reducing greenhouse gas emissions; energy conservation; water conservation; reducing and environment-friendly disposal of waste generated from the manufacturing process; sustainable recycling, recovery and reuse of waste in the production process; use of sustainable raw materials and practices.



All Employees, Suppliers, Vendors, Agencies, Dealers, Distributors, Consultants, and affiliates are accountable for full compliance with this Code. Penalties for breach of this Code shall be determined by the Board of Directors in the case of Directors, and to the person designated for this purpose by the Managing Director in the case of the other employees.

Penalties may include serious disciplinary action, removal from office, as well as other remedies to the extent permitted by law and/or as appropriate under the circumstances.

Any significant breach of the Code by Directors and Employees must be notified to the Board of Directors and the Managing Director as the case may be. The Managing Director shall report to the Company's Board of Directors on the Code's operation and effectiveness along with any significant breach of the Code.

Any significant breach of the Code by Directors and Employees must be notified to the Board of Directors and the Managing Director as the case may be. The Managing Director shall report to the Company's Board of Directors on the Code's operation and effectiveness along with any significant breach of the Code.

INTERPRETATION

Any question relating to how this Code should be applied or interpreted should be addressed to the Compliance Officer. We have tried to cover all possible eventualities. However, no Code of Conduct can cover all situations we may encounter. Thus, we need to adhere to the following principles where specific rules cannot be established:

- 1 Decisions made and actions taken must be consistent with Company values and Company objectives
- 2 Tega is focused on delivering long-term value to its employees, shareholders, customers, and society. It is expected that we will do what is right to support the long-term goals of the Company
- 3 Tega competes to win, but within the framework of integrity, transparency and compliance with all applicable laws and regulations
- 4 If ever in doubt about a decision, it should be escalated to a higher level of management for broader consideration
- 5 Should anyone ever see a deviation from the above principles, it is expected that he/she will report the violation through the appropriate channels. Where the appropriate channel is not identified, the same will be reported to immediate higher level of management



ADVICE, GUIDANCE, AND REPORTING

Sooner or later while working at Tega you may be confronted with a situation that presents an ethical dilemma. When that happens, do not hesitate to speak up, ask questions about your responsibilities, and report concerns or non-compliant conduct when needed. Always try first to address questions or concerns with your immediate supervisor or others who can help, such as Human Resources, Legal, or Company Secretary.



If you are uncomfortable or unsuccessful in discussing an issue with one of the choices set out above, you should be aware that the Whistle Blower Policy is another alternative to obtain advice or raise a concern in good faith about any situation that you know, or suspect violates our Code or the law. Your report will be read by the Chairperson of the Audit Committee who is an Independent Director and who will deal with your report in a professional manner. Reports and related information will be treated confidentially and shared with only those persons who need to know in relation to safeguarding the interests of the company.



Cooperation with investigations, audits, and internal control activities Preventing and detecting violations of the Code or the law is taken very seriously at Tega. Similarly, any potential violation of the Code or the law will be investigated promptly. As such, employees are required to cooperate fully and honestly in any investigation, audit or internal control activity, which includes promptly responding to all information requests. All documents, including but not limited to hard copy, electronic and email files, are the property of the company and may be reviewed from time to time in compliance with applicable data privacy law.



A safe and confidential way to report misconduct at Tega Industries Limited

Tega Industries is committed to the highest standards of integrity, transparency, and accountability. Our Whistle Blower Policy provides directors, employees, and stakeholders with a safe, confidential channel to report unethical practices, misconduct, or breaches of our Code of Conduct—without fear of retaliation.

WHAT CAN BE REPORTED

- | | | | |
|---|------------------------------------|---|----|
| 1 | Ethics & Code Breaches | Violation of Law / Regulation | 6 |
| 2 | Data Manipulation / Leaks | Any Unethical or Improper Conduct | 7 |
| 3 | Harassment & Discrimination | Forgery / Falsified documents | 8 |
| 4 | Fraud / Financial Irregularities | Misuse of Funds / Resources | 9 |
| 5 | Health, Safety & Environment Risks | UPSI Leaks / Confidential Info Breaches | 10 |

Role of Employees

Raise concerns early

Talk to Supervisor / HR / Legal / Audit

Act in good faith

Reporting helps protect the company & colleagues



How to Report?

Audit Committee Chairperson

Madhu Dubhashi | Independent Director

☎ +91 98231 44924

✉ madhudubhashi@yahoo.co.in

Vigilance Officer

Manjuree Rai | Company Secretary, Global Head - Legal & Compliance

☎ +91 90514 98504

✉ manjuree.raai@tegaindustries.com

PROTECTION FROM RETALIATION

Tega does not tolerate retaliation against any employee who reports a concern in good faith. Individuals who act against a person for raising a concern or participating in an investigation will be subject to disciplinary action, up to and including termination of employment.

The Code Of Business Conduct (cobc) Is Intended Solely As An Ethics Guide. The Language Used Shall Not Be Construed As Creating A Contract Of Employment Between Tega And Any Person. Tega Expressly Retains The Right To Unilaterally Modify Or Amend This Code, At Tega's Sole Discretion, With Or Without Prior Notice To Employees.



PARTNERSHIPS IN PRACTICE

REGISTERED OFFICE

Godrej Waterside, Tower II, Office No. 807, 8th floor, Block DP-5, Salt Lake Sector V, Bidhannagar, Kolkata, West Bengal 70009

Website



LinkedIn

