




















Code of Conduct

We do What's Right

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* Principles are inspired by the Global Business Standards (GBS) Codes, as referenced in the HBR article "Does Your Company's Conduct Meet World-Class Standards?" by Lynn Paine, Rohit Deshpandé, Joshua D. Margolis, and Kim Bettcher.

A Message from Leadership

Dear Colleagues,

Welcome to Poly Medicure Limited

Polymed is committed to maintaining high ethical standards in all its operations and business practices. With this code of conduct, we want to reaffirm our commitment to comply with business ethics, laws, and regulations of the country where we operate.

This is our guide to adopt the right practice in business. It is a “must read” and a “must follow” for each one of us.

Nothing is more important to Polymed than making sure ‘we do what is right - nothing puts us at risk more than the failure to do it.’

Our values and behavior are the foundation of our code. They define how each of us must act to ensure that Polymed sustains its reputation and continues to earn the trust that allows us to prosper as a company.

The Code of Conduct defines the standards of expected behavior towards all our stakeholders. We strongly encourage you to read, understand, and follow the “Code of Conduct” in day-to-day work.



Himanshu Baid
Managing Director



Rishi Baid
Joint Managing Director



Our Mission

We create value for our Stakeholders by providing patient centric Medical Technology for a healthier world



Our Vision

Serve people through innovative healthcare solutions



Our Values

Integrity, Ownership, Care, Learning, Inclusivity

Introduction

Polymed has adopted this Code of Conduct (“Code”) which reflects the commitment to appropriate business conduct, the highest standards of Corporate Governance, and to managing all areas of ethical risk. This Code provides ethical guidelines and expectations for conducting business on behalf of Polymed. The Code is designed to help Senior Management Personnel, and Employees recognize and deal with ethical issues in their work. This code can help to create a cohesive understanding of the boundaries and sets standards for interacting with all stakeholders.

This Code helps ensure compliance with standards of business conduct, ethics and with regulatory requirements. While this covers a wide range of business practices and procedures, it does not and cannot cover every issue that may arise. It sets out basic principles to guide, Senior Management Personnel, and other employees of Polymed. The management may adopt more specific or restrictive practices or procedures with respect to activities or situations. All employees must conduct themselves accordingly and seek to avoid even the appearance of improper behavior.

“Polymed’s Code of Conduct reflects the organisation’s commitment to ethical business practices, strong corporate governance, and responsible risk management. The Code sets standards for professional conduct and stakeholder interactions while supporting compliance with regulatory and business ethics requirements. It also outlines core principles that guide behavior, encouraging employees to uphold integrity.”



**Following the right path always leads
to well deserved rewards.**

The Polymed Way: Principles That Guide Our Actions



FIDUCIARY PRINCIPLE

1.1 Conflict of Interest

Every person to whom this Code is applicable should be careful in avoiding personal or financial direct/indirect 'conflicts of interest' with Polymed.

A conflict of interest could be any known activity, transaction, relationship, engaged in by such person, his / her immediate family members, or close personal relationship which may be such that it can interfere with their duties towards the Polymed.

In case of any doubts about any situation, one should ask their supervisor or the Legal Counsel, HR Head of Polymed before taking any action. In case of conflict of interest, they must disclose immediately to their management and should not take any decision without first receiving the consent of the management.

If such person is considering investing directly or through his/her relatives in any customer, supplier, developer or competitor of Polymed, he or she must first take care to ensure that these investments do not compromise on their responsibilities to Polymed.

In case there is likely to be a conflict of interest, in case of any person to whom this Code is applicable, he/she should make full disclosure of all facts and circumstances thereof to the Director/ CFO and prior written approval should be obtained.

1.2 Honest and Ethical Conduct

Every person to whom this Code is applicable shall act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct and use their powers of office, in good faith and in the best interests of Polymed as a whole.

1.3 Transactions with Related Party

The Related Party transactions as defined under the Related Party Transaction Policy of Polymed are prohibited unless approved or ratified by the Board as well as Audit Committee of the relevant Polymed entity. Any person to whom this Code is applicable, shall make full disclosures of their interest whether directly or indirectly in any form along with the interest of their associates if any with respect to any agreement or understanding of any form that may be contemplated to be entered into with the Company, its Subsidiary and its Associates. The person concerned should avoid conflict of their interest along with interest of their associates if any with the Company. In case there is likely to be a conflict of interest the concerned person should make timely and fill disclosure of the facts to the Board as well as Audit Committee and obtain necessary approval(s).

1.4 Compliance

Every person to whom this Code is applicable shall comply with all applicable laws, rules and regulations. Further, they shall also comply with the various policies, guidelines, and codes formulated by the Company in compliance with the Listing Regulations and other applicable provisions.

To assist the Company in promoting lawful and ethical behavior, any possible violation of laws, rules, regulations, or the code of conduct shall be reported to the Board of Directors through the Company Secretary.

1.5 Other Directorships

The Directors/ Employees/ Consultants must disclose their Directorship, Committee membership on the Board of other companies, and substantial shareholding in other companies to the Board on an ongoing basis.

1.6 Corporate Business Opportunities

Any person to whom this Code is applicable shall not utilize the Corporate Business Opportunities (which are made available to the Company, and which are known to them due to the position held by them in the Company) for their personal benefit.

1.7 Gifts

Every person to whom this Code is applicable shall also not accept gifts from any person who deals with the Company or is seeking to deal with the Company, where the gift is being made in order to influence the director's actions as a member of the Board, or where acceptance of the gift could create the appearance of a conflict of interest.

No person shall either give or accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies, or would cause embarrassment.

Every person to whom this Code is applicable should never use personal funds or resources to do something that cannot be done with our resources.

Every person to whom this Code is applicable should never use personal funds or resources to do something that cannot be done with our resources. Every person to whom this Code is applicable will not accept any gift, except food items that shall also not be beyond the amount of INR 2,500, provided that they are not inappropriately excessive, not frequent and do not reflect a pattern of frequent acceptance, does not create the appearance of an attempt to influence business decisions. Only trivial gifts with low value can be accepted. All other gifts must be politely refused or, if received through post, returned to the donor. If return is not possible it shall be offered for charity or community purposes. It is the responsibility of the person offering, providing, receiving or accepting the gift to decide whether the gift is appropriate.

1.8 Insider Trading

Director/ Senior Management personnel shall abide by the Company's internal code for prevention of Insider Trading i.e., "Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons" and "Code of Fair Disclosure of Unpublished Price Sensitive Information".

1.9 Confidentiality

Every person to whom this Code is applicable shall maintain the confidentiality of information of the Company or that of any customer, supplier, or business associate of the Company to which Company has a duty to maintain confidentiality, except when disclosure is authorized or legally mandated.

The Confidential information includes all nonpublic information (including private, proprietary, and others) that might be of use to competitors or disclosure of which might be harmful to the Company or its associates. Trade secrets and other company-private information include, but are not limited to, formulae, concepts, devices or any information utilized in our business, which give the Company a competitive advantage with our competitors.

Trade secrets and other private company information are not exclusively technical in nature. They may include information from business investigation, new product plans, strategic goals, financial information, unpublished pricing strategies, lists of salespeople, customers and employees, and information about customer requirements, preferences, commercial traits and plans. Although this is not intended to be an all-inclusive list, it suggests the large variety of information that must be safeguarded, the use of confidential information for his/her own advantage or profit is also prohibited.

1.10 Whistle Blower Policy

The Company is committed to pursue its business objectives in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity, and ethical behavior and for the purpose encourage and protecting all of its employees who wish to raise and report their genuine concerns about any unethical behavior, actual or suspected fraud or violation of Company's Code of Conduct.

The "Whistle Blower Policy" encourages employees to bring to the Company's attention the unethical behaviour, frauds that could adversely impact the operation of the Company and its reputation. The Company will investigate such reported incidents in an impartial manner and take appropriate action in order to ensure that the Company's code of conduct is always upheld.

1.11 Protection and Proper Use of Company's Assets

Every person to whom this Code is applicable should protect Company's assets and property. Company's assets should be used only for legitimate business purposes.

1.12 Cyber Threat and Responsible Utilization of IT Resources

Every person to whom this Code is applicable shall protect the electronic information that he / she obtains / has access during the course of his/her employment with the Company against any cyber risks, in compliance with applicable information security laws.

IT Resources must be utilized solely for business purposes of the Company, except if limited personal utilization is authorized by the Company.

The following uses of IT Resources are prohibited

- Messages of harassment, discrimination, defamation, fraud or threat, including offensive messages regarding race, gender, age, sexual orientation, religion, political ideals, nationalities, physical incapacitation, ethnicity, sexual identity or any other characteristics protected under applicable law.
- Sending, accessing, storing, or communicating offensive or obscene matters in any format.
- Unauthorized distribution of Company-private/confidential information, or Polymed's Trade Secret(s).
- Causing or allowing security breaches or interruption of the network communication, and/or the unauthorized disclosure of your password/passphrase to a third party.
- Violation of any person's or company's rights protected under intellectual property laws, such as trademarks, trade secrets, patents or any other right under similar laws or regulations.
- Violation of privacy rights of any person under applicable law.
- Soliciting on behalf of any external organization, enterprise or cause unrelated to Polymed's business including, but not limited to, any commercial, religious or political organization or cause.

Except when limited by applicable laws, Polymed reserves the right to monitor the equipment, systems, and activities on the network, including but not limited to email, voice mail, Internet utilization and any information stored under appropriate circumstances and according to applicable laws. Additionally, in order to meet the maintenance, safety, commercial, legal and regulatory requirements of operations, authorized personnel and third-party service providers have limited access to the information stored in the IT Resources of Polymed to the maximum extent permitted by law. Polymed reserves the right to limit access of any user to the IT Resources at any time, with or without previous notice

1.13 Social Media Use

Every person to whom this Code is applicable, to use social media platforms wisely and responsibly. When using social media, in reference to the Company, he / she shall take adequate precautions to ensure that they do not post any information of the Company without proper authorization. Further, personal social media accounts should not be operated during office hours or on office computers and other Company-provided devices.

1.14 Communication with the Media

All external communications and releases with the public and media in relation Polymed matters shall be done only by the authorized spokesperson of Polymed and such disclosure information should be approved by relevant department of Polymed according to its policy. No one else is authorized to directly respond to these requests for information.

1.15 Compliance with Applicable Anti-Bribery Law

The anti- bribery Act of India, would be applicable to the Company's, Senior Management, all Employees, Contractors, vendors, Dealers etc. The Prevention of Corruption Act, 1988 prohibits the direct and indirect offer, payment, solicitation, or acceptance of bribes or similar facilitating payment in any form is unacceptable.

1.16 Privacy, Personal Data Protection

We respect people's privacy and we acknowledge customers, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.

1.17 Discipline, Shop-Floor Conduct, and Substance Abuse

All employees are expected to maintain high standards of discipline, safety, and professional conduct at all times while on Company premises or performing Company duties.

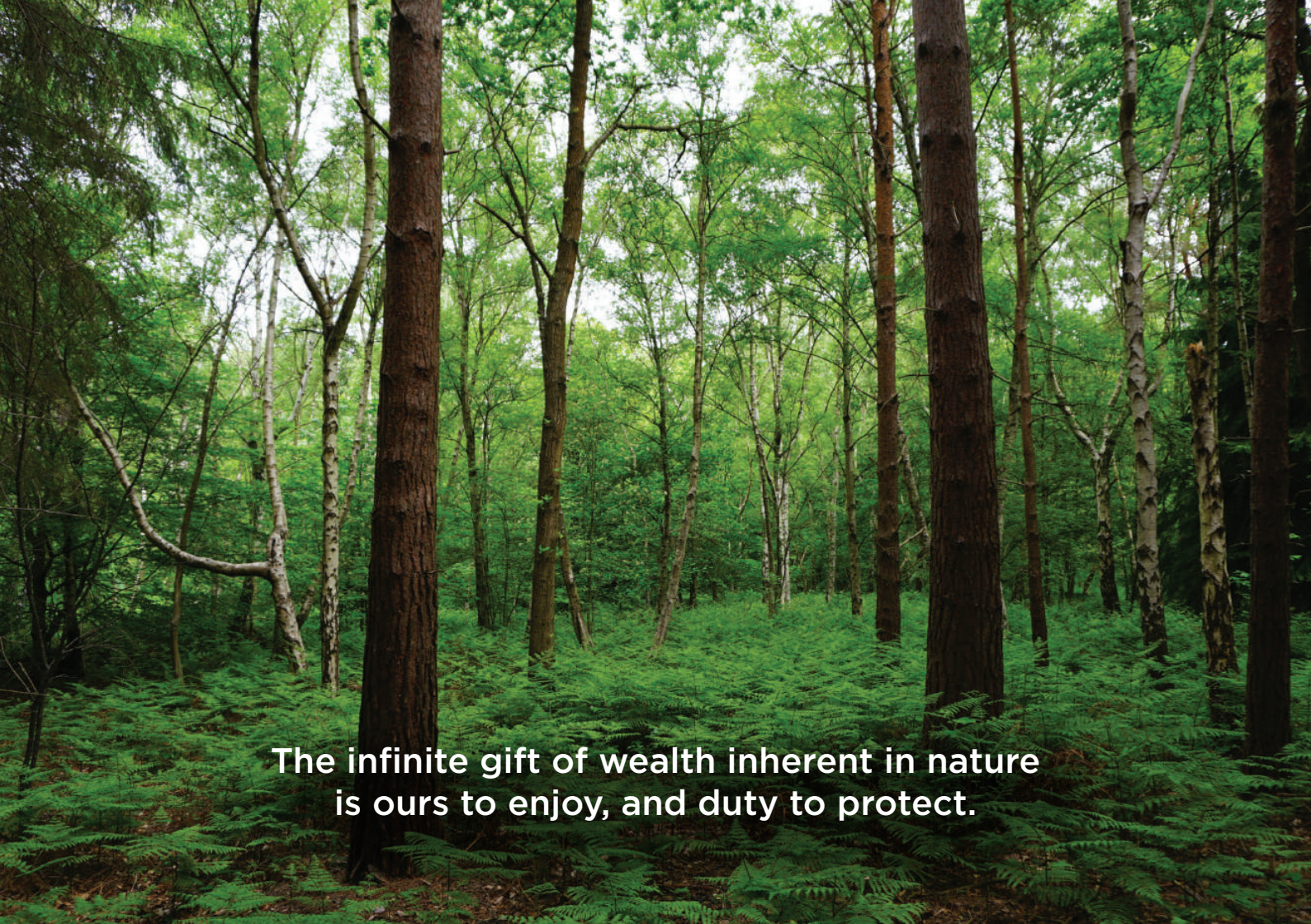
Employees must:

- Adhere strictly to assigned shift timings, attendance requirements, and production discipline.
- Follow all lawful and reasonable instructions issued by authorized supervisors and management.
- Maintain cleanliness, order, and proper housekeeping in work areas and common facilities.

The following are strictly prohibited:

- Possession, use, or influence of alcohol, illegal drugs, weapons, explosives, or any other prohibited substances or items on Company premises.
- Any form of violence, threats, intimidation, or abusive, disorderly, or disruptive behavior toward colleagues, supervisors, visitors, or Company property.

Violation of this clause may result in disciplinary action, up to and including suspension or termination of employment, in accordance with Company policy and applicable laws.

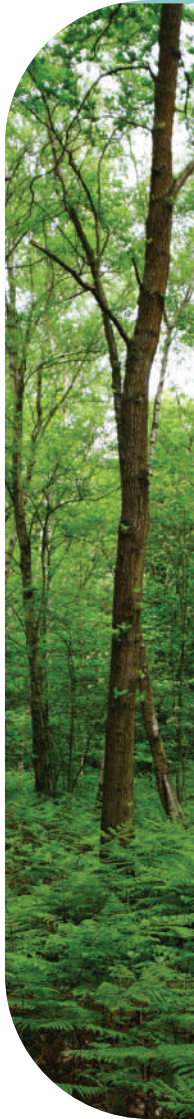


**The infinite gift of wealth inherent in nature
is ours to enjoy, and duty to protect.**

PROPERTY PRINCIPLE

Every person to whom this Code is applicable:

- a) Shall not use any Polymed asset for any personal purpose or in any operation not in line with Polymed business activity and objectives.
- b) Shall safeguard the confidentiality of all third-party Intellectual Property and data which comes to their possession during employment with Polymed.
- c) Shall respect any rules pertaining to issuing and distribution of confidential information.
- d) Must be alert about any situation or incidents that could lead to the loss, misuse, or theft of Polymed's or its customer's assets. All such situations must be reported to their departmental head/supervisors as soon as the situation arises.





To attain success as a team, we rely on each other to fulfil our roles and commitments, helping us to climb greater height.

RELIABILITY PRINCIPLE

Every person to whom this Code is applicable:

- a) Are expected to act with integrity, honesty, and ethics and establish fair contractual relations with suppliers.
- b) Should act in good faith, responsibly, and with due care, competence, and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated by others.





We need to be predictably transparent as the tidal movement of our vast oceans.

TRANSPARENCY PRINCIPLE

Every person to whom this Code is applicable:

- a) Shall ensure transparency in business communication except where the need for business security demands otherwise.
- b) Shall maintain accurate and reliable records timely to meet Polymed's legal and financial obligations.
- c) Shall inform Polymed in case they are facing any legal proceedings or litigation in any court of law.



Over the centuries the composition of a herd may change, but dignity and respect shall remain preserved.

DIGNITY PRINCIPLE

5.1 Every person to whom this Code is applicable:

- Shall commit to maintaining a workplace where each employee's personal dignity is respected and protected from offensive, threatening, or violent behavior.
- Shall strive to make Polymed an organization that welcomes and supports people of all backgrounds and identities and that offers a workplace that is free from racism, promotes gender and cultural diversity, and protects confidential and personal information of its employees.
- Shall encourage to work only with the suppliers and partners who follow ethical practices and whose work practices respect international labor standards.

5.2 Polymed is committed to providing a conducive work environment (fair and transparent) and a high level of safety standards for the benefit of its employees:

- Threatening, intimidating, or coercing other employees within or outside the premises at any time, for any purpose and reason.
- Threatening remarks, obscene phone calls, stalking, or any form of sexual harassment are strictly prohibited and will result in disciplinary action.
- Carrying unauthorized weapons or any other things in the office facilities, parking lots, guest house, or alternate workplace can be a risk to human life and cause damage to the office property.





5.3 Any business decision regarding future development is taken based on data, documentation, and reports. It is crucial that reporting and documentation should be honest, accurate and complete.

Besides being a legal requirement adequate and truthful reporting is also crucial and important for Polymed management, shareholders, and other stakeholders, and Polymed's reputation and credibility.

This approach applies to all matters of financial and data integrity to:

- Ensure that every transaction is authorized and recorded properly, truthfully, and accurately.
- Avoid distorting the true nature of any transaction.
- Ensure that all accounting follows Generally Accepted Accounting Principles (GAAP) unless these principles are not acceptable in country-specific laws and accounting requirements.
- Avoid exaggeration, guesswork, and derogatory remarks in business records and other documentation.
- Not falsify records or use creative accounting.
- Ensure that all documents are safely retained to satisfy both internal & external departments.

5.4 Every person to whom this Code applies shall be strictly prohibited from carrying liquor or any other unauthorized drugs within the work premises. They are not permitted to use, possess, sell, transfer, manufacture, distribute, or be under the influence of illegal drugs or alcohol on Polymed's workplace premises, while at work during working or non-working hours.

In addition, the employees shall not report to work while under the influence of, or impaired by, alcohol or illegal drugs or substances. Alcohol use at Polymed-sponsored official lunch/dinner events with business partners is allowed only with the approval of the Management.





**Fairness is driven by values
embedded deep within the system.**

FAIRNESS PRINCIPLE

- 6.1** Polymed is committed to implementing the principles of integrity and fairness while dealing with its shareholders, employees, customers, suppliers and all its associates.
- 6.2** Polymed is also committed to the principles of equality and respect of individuals in their relationship with direct reports, peers, subordinates, customers, and suppliers.
- 6.3** Polymed believes in achieving results through ethical business dealings and will not indulge in any activity that supports illegal or unfair trade practices. Polymed expects its employees to use their judgment and avoid actions that could be construed as taking unfair advantage or using unfair dealing practices.
- 6.4** Every person to whom this Code applies shall not engage in activities, which generate or support the formation of monopolies, dominant market positions, cartels, and similar unfair trade practices. As Polymed's business interests are spread across the world, it may be subject to competition laws of various jurisdictions and all Employees and consultants etc. shall comply with these laws.
- 6.5** Every person to whom this Code applies shall remain committed not to offer or receive any illegal payment (direct or indirect) or comparable benefits that are intended or perceived to obtain undue favors for the conduct of business. They will not directly or indirectly offer anything of value, directly or indirectly to foreign government officials or political candidates to obtain or retain business. The employee shall not indulge in any form of money laundering, fraud, or corrupt practices.

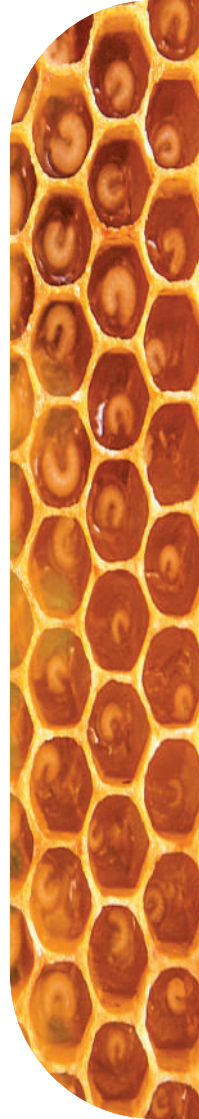




Teamwork and ordered structure is the key to an organization running smoothly.

CITIZENSHIP PRINCIPLE

- 7.1 Every person to whom this Code is applicable must comply with all the applicable laws, regulations, rules, and regulatory orders in the cities, states, and countries in which Polymed operates.
- 7.2 Polymed is committed in all its actions to benefit the economic development of the country in which it operates.
- 7.3 Polymed will promote ways to develop innovations in technology, products, processes, and business practices.
- 7.4 Polymed prefers to work with suppliers and partners who respect environmental standards.
- 7.5 Polymed and its employees will avoid any undue involvement in political activities and campaigns.
- 7.6 Safety, security, health, and environmental protection are integral parts of Polymed's operation and as such it approaches them with a commitment to any business-related activities. Every employee is personally responsible for safety, security, health and environmental protection at workplace to the full extent required by their duties to the best of their knowledge, ability and experience.
- 7.7 Political and extra-curricular activities - Polymed recognizes the interests and rights of its employees to participate personally in political activities and extra-curricular activities such as public services, membership of social organizations, sports, etc. However, involvement in such activities should not represent Polymed, interfere with the employee's performance at work, or conflict with or prejudicial to the interests of Polymed.

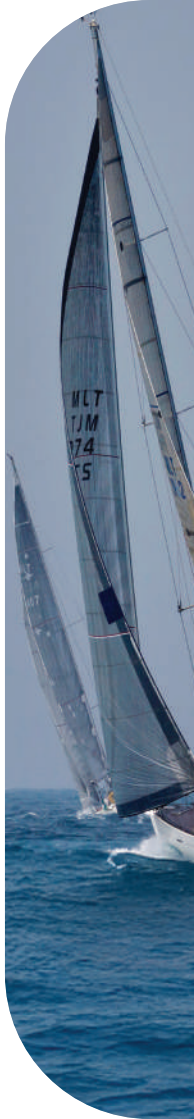




Quick thinking and adaptability to changing conditions ensure that we can pursue our predetermined paths and goals.

RESPONSIVENESS PRINCIPLE

- 8.1** Charitable contributions and donations, whenever made, shall be made without demand or expectation of business return. To make any charitable contributions & donations on behalf of Polymed, prior approval of management is required.
- 8.2** Polymed is committed to promoting diversity and social integration.
- 8.3** Employees should not use Polymed's logo or trademark for personal benefit or for any activities which are out of the scope of business conduct.



COMPLIANCE WITH CODE OF CONDUCT

Every person to whom this Code is applicable shall adhere to this Code of Conduct and affirm compliance with the Code as of the date of appointment and thereafter on an annual basis. Violation of this code will lead to appropriate action.

Disciplinary Action

Any violation of this Code of Conduct or related Company policies will be taken seriously and may result in disciplinary action, depending on the nature and severity of the offense.

Disciplinary action may include, but is not limited to:

- Verbal or written warning, suspension, or termination of employment.
- Recovery of financial losses or damage caused to the Company due to misconduct or negligence.
- Initiation of legal action under applicable laws and regulations, where warranted.

All disciplinary measures will be carried out in accordance with Company procedures and applicable labor laws.

For Questions & Complaints

Should you have questions or concerns about the interpretation or utilization of the Code, or any policy, procedure or standard associated with Polymed or in case of any complaint, you should discuss the issue with your supervisor/HOD, Human Resources or Legal Department of the Company with the following contact information:

E-mail: info@polymedicure.com

Acknowledgement

I,acknowledge that I have received and read the code of conduct documents and understand my obligations to comply with the principles, policies, and laws outlined in the Code. I agree to comply with the code including any amendments made by the Company in the future.

Signature:

Date:

Place:





FAQs

FIDUCIARY PRINCIPLE

1.1 Conflict of Interest

Q You are responsible for maintaining our company's customer database. One of your friends is starting a business venture and requests you to share a few particulars from this database for marketing purposes of his business. He assures you that he would keep the data as well as his source confidential. Should you do so?

A No. You should respect the confidentiality of customer information and not share any part of the database with any person without due authorisation.

Q You have access to revenue numbers of different business units of our company. While having a conversation with you over evening drinks, your friend enquires about the financial performance of our company. You do not share detailed information with your friend but share approximate revenue figures. Is this conduct of yours correct?

A No, it is not. You are not permitted to share financial information of our company with others who do not need to know this information. Financial information should always be safeguarded and disclosed only on a need-to-know basis after obtaining requisite approvals. Sharing of any price sensitive information that is not generally available with the public could also lead to violation of applicable insider trading laws.

Q A Purchase Manager's relative owns a company that has submitted a quotation to Polymed. Can the Purchase Manager participate in the vendor evaluation and approval process?

A No, this is not permitted. Any actual or potential conflict of interest must be disclosed immediately. The employee must recuse themselves from the evaluation and approval process, and prior written approval from management is required before any further involvement.

Q I work in a role where I interact with customers, suppliers, and internal teams, and I sometimes receive access to confidential information, business opportunities, or offers of gifts or benefits. I may also have personal relationships, investments, or outside interests that are unrelated to my work. What should I keep in mind when making decisions in such situations?

A In such situations, you should ensure that your actions and decisions are always taken in the best interests of the Company and are consistent with the principles of integrity, objectivity, and confidentiality set out in this Code. You should avoid situations where personal interests, relationships, or benefits could influence, or appear to influence, your professional judgment. Where there is any doubt, you should make a full and timely disclosure and seek guidance or approval through the appropriate internal channels before proceeding.

1.2 Honest and Ethical Conduct

Q Incorrect production data is being reported to meet targets. Should the employee remain silent?

A No. Employees must not ignore or conceal incorrect reporting. Any inaccurate or misleading data must be reported immediately to ensure honest, accurate, and complete reporting in line with Company standards.

1.3 Transactions with Related Party

Q I am an accountant in the finance department of my company. Due to my artistic skills, I received an offer to pen cartoons for a children's publication for which I would receive compensation. I plan to undertake this activity during weekends. What should I do before accepting this offer?

A Before accepting the offer, you should ascertain whether the company policies and rules require you to make a disclosure to your supervisor so that the company may determine whether your undertaking this activity adversely affects our company's interests. On confirmation from the company that it does not do so, you would be free to take up the activity. It is also your duty to bring to the attention of the company whenever there is any change in the situation you have disclosed.

1.4 Compliance

Q An HR executive is instructed to delay statutory filings to manage workload or timelines. Can this instruction be followed?

A No. Compliance with statutory and legal requirements is mandatory. Any instruction that violates applicable laws must not be followed and should be escalated appropriately.

1.5 Other Directorships

Q A senior employee accepts a directorship in another company without informing Polymed. Is this acceptable?

A No. All external directorships and similar positions must be disclosed to Polymed and require appropriate approval from the Board or Management.

1.6 Corporate Business Opportunities

Q A Sales Manager uses customer expansion information gained at Polymed for personal investment. Is this permissible?

A No. Business opportunities and information identified through Polymed belong to the Company. Using such information for personal gain is a conflict of interest and is strictly prohibited.

1.7 Gifts

Q A supplier sends an employee a festival gift worth INR 10,000. Can the employee accept it?

A No. Such a gift must be returned or submitted to the Company. Only trivial gifts such as food items not exceeding INR 2,500, which are infrequent and do not influence business decisions, may be accepted.

1.8 Insider Trading

Q Our company has recently announced the launch of a new business initiative. In connection with this, your friend who is a journalist with a leading business newspaper has asked you to provide some information that he could cover in his forthcoming article. He has promised not to quote you or reveal your identity. Should you be giving him this information?

A No. You should not be sharing information of this nature with the media, even if it is assured that the source would remain anonymous. Only authorised personnel in the company are permitted to speak to the media and provide information of this nature.

1.9 Confidentiality

Q An R&D employee discusses a new formulation with a competitor's employee. Is this allowed?

A No. Confidential, proprietary, and trade secret information must never be shared with competitors or unauthorized persons.

1.10 Whistle Blower Policy

Q My supervisor has asked me to do something which I believe may be illegal. I am afraid if I do not do what I am told, I could lose my job. Should I do it?

A No. Breaking the law is never an option. Discuss the situation with your supervisor to be certain that you both understand the facts. If your concerns are not resolved, contact a higher-level supervisor, the Ethics Counsellor, the Legal department or report them via the company's confidential reporting system, if available.

Q In the course of my work, I may become aware of information, conduct, or situations that raise concerns about legal compliance, ethical behaviour, data privacy, use of Company assets, workplace discipline, or the Company's public image, including through social media or external communications. What should I do in such circumstances?

A You should handle all Company information, assets, systems, and communications responsibly and in accordance with applicable laws, Company policies, and this Code. If you become aware of any conduct or situation that may be unlawful, unethical, or inconsistent with the Code, you are encouraged to raise the concern in good faith through the appropriate reporting or whistle blower channels. The Company is committed to addressing such matters fairly and to protecting those who speak up responsibly.

1.11 Protection and Proper Use of Company's Assets

Q An employee uses Company tools for personal work at home. Is this acceptable?

A No. Company assets must be used strictly for official business purposes unless explicitly authorized.

1.12 Cyber Threat and Responsible Utilization of IT Resources

Q An employee shares their system password with a colleague for convenience. Is this permitted?

A No. Password sharing is strictly prohibited as it compromises information security and system integrity.

Q What actions are strictly prohibited?

A Data leakage, sharing passwords, accessing obscene or inappropriate content, unauthorized access, or misuse of Company systems are strictly prohibited.

1.13 Social Media Use

Q Our company has a “Use of Social Media” policy that lays down the “dos and don’ts” for use of social media even if you may access such media on your own time. Why is there such a policy?

A External communication is a serious matter. It must be carefully managed because information put out with reference to our company or its businesses needs to be clear, truthful and not violate any undertakings we have given to other parties. In each business there are managers nominated to authorise and make different types of statements to the outside world. These managers should be consulted about any request for information you may receive or information you think we should give out.

In using social media, in particular blogs or social networking sites, you should exercise great caution while talking about our company or the business we do. It may feel like you are chatting with friends or expressing a personal opinion but even while doing so you cannot share any confidential information of our company.

Q Can I use social media during office hours?

A Personal social media use during office hours or on Company devices is not permitted.

1.14 Communication with the media

Q A journalist approaches an employee for comments on Company matters. How should the employee respond?

A The employee must not provide any comments and should refer the journalist to the Company's authorized spokesperson.

1.16 Privacy, personal data protection

Q Employee personal data is shared casually on WhatsApp. Is this acceptable?

A No. Personal data must be protected and not to be shared with anyone.

1.17 Discipline, Shop-Floor Conduct, and Substance Abuse

Q An employee reports to work under the influence of alcohol. What is Polymed's stance?

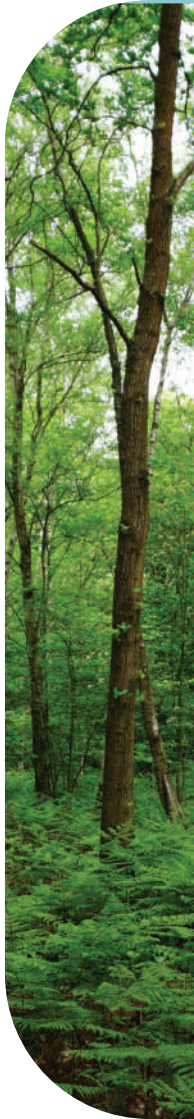
A This is strictly prohibited and will result in disciplinary action.

Q What behaviour is unacceptable?

A Violence, intimidation, substance abuse, weapons, or disruptive conduct.

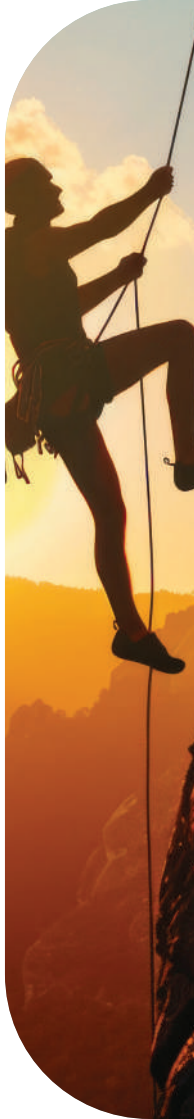
PROPERTY PRINCIPLE

- Q** An employee uses a company laptop and printer to run a personal side business after office hours. Is this acceptable?
- A** No. Polymed assets must not be used for personal purposes or activities unrelated to company business.
- Q** An employee notices that company material is frequently going missing from the store but does not report it. Is this appropriate?
- A** No. Any risk of loss, misuse, or theft of company or customer assets must be reported immediately.



RELIABILITY PRINCIPLE

- Q** You are in the process of selecting potential vendors for a project. One of the three finalists is a group company. In reviewing the final proposals, you rank the group company second out of the three proposals based on pricing and total cost of ownership and select the first-ranked vendor. Is this the right decision?
- A** Yes. You should select the vendor that, on its own merits, is the vendor that is most appropriate for your company's requirements. You should not select a group company only because of its affiliation.



TRANSPARENCY PRINCIPLE

- Q** An employee provides incomplete data in an internal report assuming it will be corrected later. Is this acceptable?
- A** No. All records and reports must be accurate, complete, and reliable at the time of submission.
- Q** An employee shares sensitive business information externally without authorization in the name of transparency. Is this allowed?
- A** No. Transparency does not override business security and confidentiality requirements.

DIGNITY PRINCIPLE

- Q** A supervisor uses abusive language toward a subordinate. Does this align with Company values?
- A** No. All employees must ensure a workplace where personal dignity is respected and protected from offensive or threatening behavior.
- Q** A manager discourages hiring candidates from certain backgrounds due to personal bias. Is this permitted?
- A** No. Polymed promotes a workplace free from racism and discrimination and supports diversity and inclusion.
- Q** An employee alters data slightly to make a project report appear more successful. Is this acceptable?
- A** No. All reporting and documentation must be honest, accurate, and complete.
- Q** A manager asks an employee to delay recording a transaction to improve quarterly results. Should the employee comply?
- A** No. All transactions must be authorized and recorded truthfully in accordance with accounting principles.



FAIRNESS PRINCIPLE

- Q** A job requirement entails extensive travel. One of the candidates has excellent relevant experience and qualifications. However, this candidate is a single parent. As a result, I feel such a situation would significantly hinder this candidate's ability to cope with the job requirement. What should I do?
- A** In accordance with the Code, the decision to recruit an employee should be based upon merit. We cannot make a presumption that the candidate would not be able to meet the travel requirements of the job. All eligible candidates should be provided with equal opportunity to demonstrate or justify that they can cope with the travel requirements of the job. Being a single parent cannot be a ground to be discriminated against at any stage of recruitment or ongoing employment in our company

CITIZENSHIP PRINCIPLE

Q An employee ignores a local regulatory requirement while working on a project in another state, assuming Company policy is sufficient. Is this acceptable?

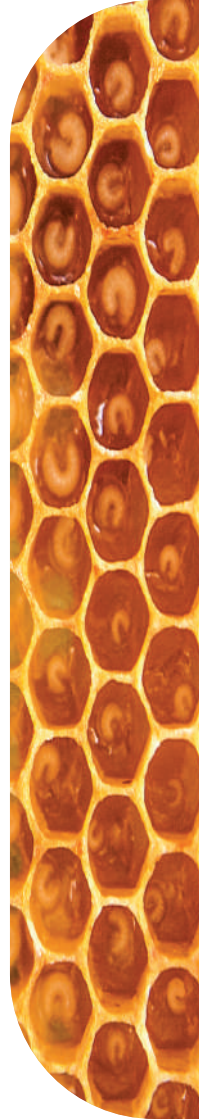
A No. Employees must comply with all applicable local, state, national, and international laws where Polymed operates.

Q A business decision increases profits but negatively impacts local economic development. Does this align with Polymed's commitment?

A No. Polymed is committed to contributing positively to the economic development of the country in which it operates.

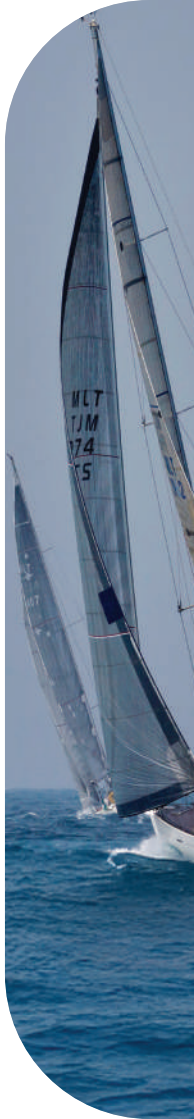
Q An employee actively campaigns for a political party while representing Polymed at a business event. Is this permitted?

A No. Polymed and its employees must avoid undue involvement in political activities that represent the Company.



RESPONSIVENESS PRINCIPLE

- Q** An employee uses Polymed's logo on personal social media posts or for a personal event. Is this permitted?
- A** No. Polymed's logo or trademark must not be used for personal benefit or activities outside the scope of business conduct.



RAISING ETHICAL CONCERNS

Adherence to applicable laws, regulations, and the highest standard of ethical conduct is a mandatory obligation of all employees of Polymed. The Company expects all individuals to conduct business in a lawful, ethical, and responsible manner and to promptly report any actual, suspected, or potential violations of the Polymed Code of Conduct, Company policies, or applicable laws and regulations.

Timely identification, escalation, and remediation of ethical and compliance issues are critical to safeguarding Polymed's legal standing, corporate governance standards, and reputation as a responsible corporate citizen.

The Code of Conduct is intended to provide an overview of key policies and standards applicable to the workplace. However, it cannot address every situation that may arise. In circumstances where the appropriate course of action is unclear, employees are expected to exercise sound judgment and common sense. If a situation appears unethical or improper, it should be treated as such.

Employees who have questions regarding the correct course of action, or who reasonably suspect or become aware of a potential violation of applicable laws, regulations, or the Polymed Code of Conduct must promptly report such concern through one of the following reporting mechanisms (preferably in the order listed below):

- Executive Director
- Group Head - Human Resources
- Chief Financial Officer (CFO)
- Group Head - Legal

Where an individual is uncomfortable raising a concern directly or in person, the concern may be reported through alternative reporting channels outlined below:

S.No.	Reporting Channel	Contact Information	Availability
1	Email	ethics@polymedicure.com	24 hours a day
2	Written letter	<ul style="list-style-type: none">• Executive Director• Group Head - Human Resources• Chief Financial Officer (CFO)• Group Head - Legal	Working hours 9:30 am - 6:00 pm

The Company will strictly prohibit retaliation. The Company will ensure that no adverse action is taken against any employee who, in good faith, reports a concern or suspected violation of the Company's Code of Conduct.

Annexure – 1

Procedure for Ethics Complaint Handling

Step	Procedure	Detail
Step-1	Submission of Complaint	<p>Any employee or stakeholder may report an actual or suspected ethical non-compliance by submitting a complaint to the Ethics Committee through:</p> <ul style="list-style-type: none"> • Email, or • Written letter addressed to the Ethics Committee.
Step-2	Acknowledgement of Complaint	All complaints received shall be formally acknowledged within 2 working days and recorded by the Ethics Committee.
Step-3	Preliminary Assessment	The Ethics Committee within 15 working days of receipt of the complaint shall conduct a preliminary review to assess the nature, seriousness, and credibility of the complaint
Step-4	Investigation	Where deemed necessary, the Ethics Committee shall initiate an investigation within 30 working days from the date of preliminary assessment, either directly or through designated internal or external resources. In complex cases, this timeline may be extended with reasons recorded in writing.

Step	Procedure	Detail
Step-5	Decision and Action	Based on the investigation findings, the Ethics Committee shall take appropriate action within 10 working days in accordance with the Code of Conduct and applicable policies.
Step-6	Closure of Complaint	The complaint shall be closed within 60 working days from the date of receipt of the complaint upon completion of the review and implementation of actions, with proper documentation maintained by the Ethics Committee.
Confidentiality and Protection		All complaints shall be handled with strict confidentiality. No retaliation shall be permitted against any individual who reports a complaint in good faith.

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