	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

## Objective:

- To protect the interest of all stakeholders by providing employees with the required guidance to pursue high standards of ethical conduct and foster a culture of honesty and accountability at Astral.
- To ensure that employees perform their work in a professional manner and encourage their peers / subordinates / other employees to do the same.
- To protect the right to work in an environment free from any kind of offensive behaviour.

## Scope:

This policy is applicable to all employees of Astral Group includes it all subsidiary companies.


## 1. Code of Conduct

### 1.1 Compliance with Applicable Laws, Rules and Regulations

- Employees, while discharging their duties, shall fully and promptly comply with all applicable statutory laws and regulatory requirements and, if in doubt, shall refer the matter to respective reporting managers and/ or HR Department for advice.
- Employees shall display the highest level of ethics and values in due process of discharging their duties on a day-to-day basis, within and outside the company premises
- Employees shall not participate in behaviour or activities which are contrary to the ethical standards of working at Astral or ones that could bring potential harm to the image and brand value of Astral.
- Employees shall strive to create an environment that fosters mutual respect amongst all employees.
- The Organisation clearly establishes guidelines that help in dealing with problems related to employee indiscipline/misconduct in a manner that is in the best interest of the individual, other employees and the Organisation.

### 1.2 Conflict of Interest

- Astral's employees are expected to dedicate their best efforts in advancing the Organisation's interests and in making decisions that positively affect the Organisation's interests, independent of outside influences.
- A conflict of interest occurs:
  - When an employee has any significant ownership/interest/financial relationship with any supplier, customer or competitor of the Organisation.

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

- When an employee has a consulting or employment relationship with any supplier, customer, business associate or competitor of the Organisation.
- When an employee engages in any other employment or personal activity during work hours, or uses Astral's property in any other employment.
- When an employee of the Organisation takes action or has interests that may make it difficult to perform his/her work objectively and effectively in promoting the interest of the Organisation.
- When outside business activity detracts an employee of the Organisation to devote appropriate time and attention to his/ her responsibilities in the Organisation.
- When a member of an employee's family receives improper personal benefits as a result of the employee's position in the Organisation.
- When an employee receives non-nominal gifts or excessive entertainment from any person/organisation with which the Organisation has current or prospective business dealings.
- Employees should be scrupulous in avoiding 'conflicts of interest' with the Organisation. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the MD and obtain a prior written approval for the same at the earliest.
- In case of conflict of interest being established, the Organisation will initiate appropriate disciplinary proceedings.
- If an employee has any question on whether an action of proposed course of conduct will create a conflict of interest, he / she will obtain clarification of the same from the HR Department.

### **1.3 Anti-corruption and Anti-bribery**


- Employees shall ensure that they abide by the Company's 'Policy on Anti-Corruption Bribery', while conducting business
- Employees shall report any unethical activity through the Whistleblower mechanism

### **1.4 Outside Employment**

- No employee is permitted to accept any employment, part-time or otherwise, or do any business directly or indirectly, in the same line of business as the Organisation; or work as an agent (directly or indirectly) for others.

### **1.5 Media Contact**

- No employee will own, wholly or in part, any newspaper or any other periodical/ publication, or conduct, or participate in conducting, the editing or management of the same.

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		


- Further, no employee can, except with the prior sanction of the HR Department, participate in any radio broadcast or give any interview to a program telecast on television, or contribute to any article or write any letter to any newspaper or periodical or make public or publish or cause to be published any documents, papers or information that will relate to the business of the Organisation and which may come into his possession in his/her official capacity
- Any employee in breach of the above will be held responsible for any loss or damage that may be caused to the Organisation in line with the applicable standing orders.

### 1.6 Confidentiality of Information

- Employees must maintain strict confidentiality with regard to the Organisation's affairs, and shall not divulge, directly or indirectly, any information either to a member of the public or of the Organisation's staff, unless instructed to do so by a superior officer in discharge of his/her duties.
- All employees of Astral are required to sign a confidentiality agreement at the time of joining the organization.
- "Confidential Information" shall mean all information, including but not limited to, graphic material, specifications, and other technical and business information and strategies, and shall include, inter alia:
  - Oral/written information, customer lists, customer contacts, customer's confidential information such as Astral's business objectives, plans, strategies, production schedules, management policies, technological and/or manufacturing secrets, process know how for manufacturing optimization/ prototypes, technical specifications, scientific and technical information, details of finished products or materials used therein, drawings, technical data, research or innovation projects, software, hardware used in the course of business, or any other information not generally known in the industry concerning the business and affairs of Astral
- Every employee shall ensure safekeeping of all official documents, records or notes in whatever manner (including matter stored in computer memory) for which he / she is responsible; In the same spirit, he / she shall also endeavour to ensure the safe custody of all files, tapes, CDs, documents or any other material which are transported outside the office premises.
- Any breach of these conditions will not be tolerated and the Organisation may initiate appropriate disciplinary action and/or legal action for any unauthorized disclosure of confidential information.

### 1.7 Anti-competitive practices

- Employees are encouraged to engage in fair competition and are strictly prohibited from using their positions to thwart legitimate activities of competitors

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

- Each employee is expected to comply with all competition and antitrust laws relevant to the areas where Astral's operations are present
- If any employee violates these policies, they may face disciplinary action as deemed fit by the management
- Employees are forbidden from sharing proprietary pricing or product information with competitors, either directly or indirectly

### **1.8 Insider Trading**

- Each employee is expected to adhere to company policies and relevant laws against money laundering and insider trading
- Any violation of such laws observed by an employee should be disclosed via the Whistleblower mechanism

### **1.9 Protection and proper use of organisation's assets**


- The Organization makes available various electronic facilities such as computer/ laptop, tablet, printer, internet etc. The use of these facilities by employees is solely for official purposes and for conducting the business of the Organisation.
- Any deviations in the usage of Organisation Assets as against prescribed norms would require approval of the HR Department.

### **1.10 Environment, health and safety**

- Astral operates its facilities and conducts its operations in compliance with applicable environmental and health and safety laws and Company standards. Astral strives to develop products and processes with a deep consideration for environmental stewardship while also prioritizing the well-being and safety of all its stakeholders.
- Every employee shall comply with Astral's Environmental, Occupational Health, and Safety Policy, as well as the Environment Management System (EMS) Manual
- Sustainable practices are not just encouraged, but expected, aligning with our commitment to a greener, safer future

### **1.11 No Gift Policy**

In order to promote appropriate standards of conduct, the company expects that all employees are restricted to accept any gift. The guidelines / policy is designed to assist employees to recognise possible and / or perceived conflicts of interest that may arise with respect to the acceptance of gifts or hospitality and also what is and is not appropriate to accept as a present, offering, advertisement,

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

award or token of appreciation both within or outside of the work premises. These gifts may come from a customer, vendor, supplier, potential employee, or potential vendor or supplier.


The acceptance of significant material gifts or special favours by an employee of the Astral Group from anyone doing business with, or soliciting business from, is not permitted. The only exception to this is minor gifts and token courtesies that do not place, or do not have the appearance of placing, the recipient under any obligation when making decisions on behalf of the company. In no even should an employee accept a gift or hospitality on the understanding that his / her position will be used to influence in strategic or operations decision. Employees shall disclose to their manager or departmental head the offer on receipt of such gifts or favours.

## 2. Grievance Management

In case of a grievance, an employee may follow the reporting procedure as outlined in the escalation matrix below


Level	Person responsible for Grievance	Resolution
1 <sup>st</sup> level reporting – Reporting of grievance by the employee in the first	Department Head or HR Representative	7 Days
2 <sup>nd</sup> level reporting - In Case employee is not satisfied with the 1 <sup>st</sup> level authority, he can go ahead with report the matter to next authority	Functional Head or Senior HR Representative	7 Days
3 <sup>rd</sup> level reporting - In Case employee is not satisfied with the 2 <sup>nd</sup> level authority, he can go ahead with report the matter to next authority	Steering Committee (senior management representatives nominated by the MD)	15 Days

- The aggrieved employee may approach the concerned person responsible via email, phone call or by requesting a meeting in person
- However, the employee will be required to submit a written complaint/ grievance to the person responsible so that action may be initiated
- The persons responsible for grievance resolution shall record all case related proceedings in writing and maintain the same as record of case resolution
- Resolution must be communicated to the employee as per defined timelines, failing which the employee may approach the next level as per Table 1 above
- Once the case is closed by the Steering Committee, the decision shall be final and binding to all

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

### 3. Whistle Blower Policy

- Astral encourages its employees to report unethical practices in the Organization and strive to create an environment of honesty and integrity
- An employee who observes any unethical or improper practices or alleged wrongful conduct, should make a disclosure to the HR Department in writing through a letter or e-mail not later than 30 consecutive calendar days after becoming aware of the same
- If the employee is unwilling or unable to put a disclosure in writing, he/she may approach the HR directly or through his/her or any other Department Head; anonymous disclosures will not be entertained
- The HR Department will prepare a written summary of the employee's disclosure and provide a copy to the employee and the MD
- The HR Department will appoint a committee in consultation with the MD (constituting independent and appropriate representatives from the HR Department and other departments) to appropriately and expeditiously investigate all whistleblower reports received detailing the procedure for the investigation (if required)
- The committee will have the right to call for any information or document and undertake interrogation of any employee of the Organization or other person(s) as they may deem appropriate for the purpose of conducting investigation under this policy
- A report will be prepared after completion of investigation and the HR Department will consider the same and report the matter to the MD
- After considering the report, the MD will determine the cause of action and may order for remedies
- Under exceptional circumstances (for example in case of fraud, forgery or high value monetary misrepresentation), the employees could also directly report the matter to the MD and he/she would then take necessary action on the same as he/she deems fit
- The identity of the employee who reported the issue will be kept confidential
- No adverse personal action will be taken or recommended against an employee in retaliation to his or her disclosure in good faith of any unethical and improper practices or alleged wrongful conduct
- This policy protects such employees from unfair termination and unfair prejudicial employment practices. However, this policy does not protect an employee from an adverse action which occurs because of poor job performance or any other misconduct unrelated to a disclosure made pursuant to this policy, independent of his disclosure of unethical and improper practices or alleged wrongful conduct.
- For any information, employees can reach out to mail id **whistleblower@astralpipes.com**

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

## 4. Policy Against Sexual Harassment


- Astral is committed to creating a safe and enabling work environment, free from any gender related/ sexual harassment issues and grievances.
- Sexual Harassment is considered as a gross misconduct and the Company has established mechanism for prevention of sexual harassment at workplace and redressal of complaints pertaining to the same
- The Company enforces this philosophy through the Policy Against Sexual Harassment
- The Company shall strive to propagate the guidelines and contents of this policy to all employees and shall expect them to strictly abide by it at all times

### Definition

- Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitutes sexual harassment when submission to or rejection of this conduct explicitly or implicitly affects an individual. Sexual harassment includes unwelcome sexually determined behavior such as:
  - Physical contact;
  - a demand or request for sexual favors;
  - sexually colored remarks;
  - showing pornography;
  - any other unwelcome physical, verbal or non-verbal conduct of sexual nature

### General Guidelines

- Each employee will maintain an appropriate standard of conduct with his / her colleagues
- Each employee will be personally responsible for adherence to the laid down code of conduct in his / her range of work. The employee will ensure that s/he does not get involved in any inappropriate act, conduct, conversation or dealings in his / her official, private and personal spheres
- It is the responsibility of every employee to communicate / report any unacceptable behavior of the kind mentioned in the definition to sexual harassment, initiated towards self or colleagues
- Thus, intentional misuse / abuse of this policy will also result in strict disciplinary action, in line with applicable standing orders, against the employee misusing / abusing the policy

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		


### Complaints Committee

- An internal Complaints Committee has been formed under the policy. All investigations shall be carried out by the Complaints Committee constituted for this purpose
- Internal Complaints Committee must comprise of the following members as nominated by the Organization:
  - o A woman employee employed at a senior level amongst the employees shall act as Presiding Officer of the committee
- Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge
- One member shall be from amongst non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment
- At least half the total members of the committee must be women
- Aggrieved employees can send mail at [posh@astralpipes.com](mailto:posh@astralpipes.com)

### Redressal Process

- Any aggrieved employee shall make in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee
- The matter will be investigated promptly by the Complaints Committee in accordance with the principles of natural justice, basis of fundamental fairness and in an impartial manner
- Sufficient precaution will be taken by the Organization to ensure that complete confidentiality is maintained and no form of discrimination is faced by the employee who has escalated the complaint
- The Complaints Committee will investigate all complaints thoroughly and promptly, in a free and fair manner. The investigation may include private interviews with the person filing the complaint, the person alleged to have committed the offence and witnesses, if any
- As far as possible, all efforts shall be made to complete the investigation within 30 days from the date of the complaint and is extendable by such period as the Presiding Officer of the Internal Complaints Committee may deem fit
- If the investigation reveals that Sexual Harassment has been committed, the Complaints Committee will forward its findings and recommendations to the Steering Committee, who will decide the disciplinary action to be taken
- Intentional misuse / abuse of this policy will also result in strict disciplinary action against the employee misusing / abusing the policy




	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

## 5. Prevention of Criminal Acts

- Consumption of drugs and or any other substance abuse and the possession of concealed weapons/ firearms will be considered as a criminal activity notwithstanding local statutes or regulation
- The presence of illegal drugs or banned substances with an employee on the job will be grounds for immediate termination
- The same disciplinary action will apply to employees who come to work under the influence of drugs, alcohol or other banned substances
- Astral provides a smoke-free environment for all of its employees within office confines
- Employees who smoke are expected to respect the rights of others and restrict smoking to outside the building or at designated smoking areas
- Employees are prohibited to carry any weapons in any building owned or operated by Astral
- Carrying weapons on the organization's premises, vehicles and premises of the organization's customers, vendors and partners is also prohibited

## 6. Workplace Diversity

- In keeping with its fundamental principle of being an Equal Employment Opportunity Company, Astral is committed to diversity with respect to all aspects of employment.
- Every effort will be made to make the employee workforce representative and reflective of the communities in which the Organisation's services are provided.
- Astral prohibits discrimination, harassment, bias or prejudice on the basis of an individual's race, colour, nationality/ancestry, ethnicity, age, role, sex/gender (including intersex, transgender or intergender status), political affiliation, union membership, pregnancy, maternity, paternity or caring responsibilities, marital or relationship status or civil partnership, sexual orientation, gender/sexual identity or expression, physical/mental disability, caste/creed, religion and religious affiliation, any other protected status under applicable law, etc.
- All decisions regarding recruitment, hiring, promotion, compensation, employee development decisions such as training, and all other terms and conditions of employment, will be based solely on performance, merit, competence and potential.
- Each employee, regardless of position, will be responsible for applying the Workplace Diversity Policy on an ongoing basis.
- Each employee is expected to treat all other employees with dignity and respect and in a fair and non-discriminatory manner in all employment-related dealings.
- It is important for every employee to conduct himself or herself, in conformity with the Standards of Conduct, in a culturally sensitive, tolerant and respectful way towards each other and refrain from the creation of any repeated or persistent aggression, whether physical, verbal or psychological having a negative effect on conditions at the workplace or aimed at humiliating,

	<b>ASTRAL LIMITED</b> 207/1, Astral House, Off. SG Highway, B/h. Rajpath Club, Ahmedabad - 380 059	<b>Policy No. HR / ESG/ 01</b> <b>Date: 01.04.2022</b>
<b>Policy on Code of Conduct</b>		

demeaning, offending, intimidating an individual or a group of individuals, and potentially seriously affecting their health, career or dignity, which is considered as harassment. The employee is expected to perform decent behaviour while in employment on the organisation.

**Sandeep Engineer**  
**Managing Director**

01.04.2024