



**Guide to Business Conduct** 

COR/CGBC/Ver.4.0/1.4.2023

Dear Colleagues,

Coromandel has always strived towards a reputation of trust, integrity and ethical business practices, by consciously and continually reinforcing the importance of our values. Our challenge is to continue maintaining this high standard, even as we become a global company and work in multi-cultural environs.

To this end, we are adopting the 'Coromandel Guide to Business Conduct (CGBC)' to set forth the principles which will guide our transactions with each other, our customers, outside businesses, governments, communities and shareholders. The essence of this code is based on The Five Lights of the Murugappa Group.

To be a value-based Company, everyone must participate in the process of ensuring our business lives up to our ideals. The **Coromandel Guide to Business Conduct** serves as the basis for the way we manage our business.

CGBC is applicable to all employees across all locations around the world. The standards apply while working on our premises, at offsite locations where business is conducted, at Coromandel sponsored business and social events, or at any other place where we represent Coromandel. We are committed to continuously review and update the CGBC to keep it aligned with the everchanging business environment.

The CGBC serves as an ever-present reminder of our responsibility to build our relationships with our stakeholders on a platform of integrity, fairness and humanity. Coromandel's reputation is entrusted to each of us and to this end, I urge you to practise the CGBC in letter and spirit.

Sincerely,

APAmar

Dr. K. Pradeep Kumar EVP and Head of HR

# The five lights



- INTEGRITY We value professional and personal integrity above all else. We achieve our goals by being honest and straightforward with all our stakeholders. We earn trust with every action, every minute of every day.
- PASSION We play to win. We have a healthy desire to stretch, to achieve personal goals and accelerate business growth. We strive constantly to improve and be energetic in everything that we do.
- QUALITY We take ownership of our work. We unfailingly meet high standards of quality in both what we do and the way we do it. We take pride in excellence.
- RESPECT We respect the dignity of every individual. We are open and transparent with each other. We inspire and enable people to achieve high standards and challenging goals. We provide everyone equal opportunities to progress and grow.
- RESPONSIBILITY We are responsible corporate citizens. We believe we can help make a difference to our environment and change lives for the better. We will do this in a manner that befits our size and also reflects our humility.

#### COR/CGBC/Ver4.0/1.4.2023

### Adherence and Upkeep of faith in CGBC

### Adherence and Upkeep of faith in Coromandel's Guide to Business Conduct

- On accepting employment with Coromandel, the employee becomes accountable for adhering to all the provisions of the CGBC and all new employees should be provided a copy of the CGBC on joining the Company.
- The CGBC is intended to supplement and not replace the existing regulations & policies applicable to employees.
- If the CGBC defines a higher standard of conduct than specified by law, then the CGBC shall prevail.
- Any waivers from the CGBC should be approved by the Managing Director or a person nominated by him.
- Managers should communicate the importance of adhering to the CGBC to all their subordinates.
- In case of non-compliance or violation of the CGBC, employees should bring the same to the attention of superiors or the Human Resources division.
- It is incumbent upon every employee to make a full disclosure to the Human Resources division of any interest, which the immediate family or the employee may have in a Company, or firm which is a supplier, customer, distributor or has other business dealings with Coromandel.
- Employees should discuss with their superiors or the Human Resources division for any clarification or confusion regarding the interpretation of the CGBC.
- Any employee who violates the CGBC will be subject to corrective or disciplinary action, irrespective of his/her competence and grade.
- The upkeep and maintenance of the CGBC is the responsibility of the Human Resources division and they should:
  - a. Ensure annual assessment and review of the CGBC.
  - b. Provide compliance training with the CGBC.
  - c. Respond to questions about the guidelines.
  - d. Check reports of violations of the CGBC.



We value professional and personal integrity above all else. We achieve our goals by being honest and straightforward with all our stakeholders. We earn trust with every action, every minute of every day.

# Do's

### 1.1 Ethical conduct of Employee

- Represent Coromandel with pride and display high moral and ethical standards and deal on behalf of Coromandel with professionalism, honesty and integrity.
- Refrain from granting personal favours or display favouritism in any activity that is related with Coromandel.
- c. Surrender all items as mentioned in the Employee Clearance Form at the time of separation / transfer.
- Adhere to the guidelines as specified in Benefits Policy Manual and Delegation of Authority Manual.
- e. Follow all terms and conditions as mentioned in the appointment letter.

#### 1.2 Ethical dealing with Government

a. Coromandel should not align itself with any political party.

### 1.3 Ethical dealing with Suppliers

- Comply with all applicable laws and provisions governing import of raw materials and all other international transactions.
- b. Select suppliers / vendors / contractors / service providers through a competitive bid process or as provided in the DOA, unless it is decided as a business strategy to go with a specific service provider. Selection decisions should be based on objective criteria such as price, quality, service, reliability, integrity, etc.
- c. Protect the proprietary information of suppliers, vendors or joint venture participants with the same amount of caution as exercised in protecting Coromandel's information.

#### 1.4 Ethical dealing with Customers

- Strive to meet and exceed farmers' and dealers' expectations of quality, cost and delivery.
- b. Abide by all applicable statutes of the Consumer Protection Act and honour the privacy rights of its consumers.
- c. Maintain confidentiality of personal information such as names, emails, telephone numbers, addresses and other business related data collected from farmers or dealers for any product promotion or for database purposes.

# Do's

### 1.5 Ethical dealing with Competition

- a. Respect patents, trademarks and copyrights of competition.
- b. Collect competitive information only through legally permitted sources and ethical means.
- c. Co-operate with competition in making industry representations to government to solicit measures favourable to the industry.
- Participate in respected industry associations with a view to share best practices and define dealer credit terms, payment practices, discount policies etc.

### 1.6 Accepting or Giving Gifts

- Gifts or personal benefits in the categories mentioned below, which have no likelihood of improperly influencing the employees, are acceptable:
  - i. Business courtesies, such as business meals or entertainment.
  - Paid domestic or foreign trips in connection with Coromandel's business and only with the prior approval of the Managing Director.
  - iii. Guest House accommodations in connection with Coromandel's business.
  - The policy on gifts as mentioned in the Code of Conduct for Board of Directors and Senior Managers, drafted as per the SEBI guidelines.
  - For any queries on whether a particular gift is acceptable or not, contact Head of HR.

#### 1.7 Maintain Accurate Financial Records and Reports

- a. Prepare and maintain the records of Coromandel's financial position fairly and accurately in accordance with the accepted accounting and financial reporting standards of the country in which Coromandel conducts its business affairs.
- Recognise revenue and expenses timely and properly. Value assets and liabilities appropriately.
- c. Ensure full, fair, timely and accurate disclosures or filing of communication with SEBI, Stock Exchanges, Government departments & agencies or financial community.

# Do's

### 1.8 Abstain from Insider Trading

- Adhere to the norms of insider trading as specified by Company Insider Trading code, SEBI guidelines and other regulatory bodies.
- b. Trade in stocks or securities of Coromandel or other Murugappa Group companies only two business days after the material, non-public information or the quarter or annual results of the company have been released.
- c. Maintain confidentiality of non-public information, even after leaving Coromandel till it has been adequately disclosed to the public.

### 1.9 Comply with all Applicable Statutes

- Employees should be knowledgeable/aware of the laws, regulations etc, laid down under statute/rule as applicable to their jobs and areas of responsibility.
- Comply with all laws and regulations while carrying out our job, both in letter and in spirit, as applicable in the regions where we operate.

### Don'ts 1

### 1.1 Conduct of Employee

- a. Compromise with the CGBC.
- b. Use Coromandel's funds or assets for personal use except those provided to employees for restricted personal usage.
- c. Submit wrong expense claims or submit false certificates to avail benefits.
- d. Perform outside/personal work or solicit outside business while on Coromandel premises or while working on Coromandel time without notifying immediate superior or functional head.
- e. Bind the Company or enter into any transaction on behalf of the Company beyond the power vested in the employee by the DOA or the position.
- Trade in stocks or securities of Coromandel or other Murugappa Group companies during the window period.

### 1.2 Dealing with Government

- Bribe any government official/representative in order to get any favourable results or influence their decisions/conduct to expedite the progress of work.
- Make a false statement or a false claim to a government official or conceal any documents regarding payment claims.

Insider tracing - refers generally to buying of stock or security, in breach of trust and confidence, while in possession of material, non-public information about the Company.

# Don'ts 1.3 Dealing with Suppliers

 Seek to get any unjustifiable discounts or benefit while purchasing any product or services from suppliers or vendors for personal use.

#### 1.4 Dealing with Customers

- Use prices, promotional allowances, credit and service assistance etc., as a means to extend personal favours to dealers or farmers or other customers, unless it is decided as a business strategy.
- b. Share personal information, such as names, emails, telephone numbers, addresses etc., collected from farmers or dealers, with any third party without the permission of the concerned person, unless required to help Coromandel provide service to its customers, and that too only if such third party agrees to protect the privacy and security of such information.
- c. Support business or marketing plans that involve inappropriate or unauthorised collection, use or disclosure of individual customer information.

### 1.5 Dealing with Competition

- Infringe upon the trade secrets, intellectual property rights and proprietary and confidential information of competition.
- b. Force an employee who has worked with a competitor previously to share the proprietary information of that competitor.
- c. Employ unfair practices to obtain data about competitor activities, competitor strategy and other trade secrets or proprietary information.
- Indulge in industrial espionage or make misleading statements about competitor's products and services to sabotage competition.

#### 1.6 Accepting or giving gifts/bribes

- Accept, either directly or indirectly, through our immediate family<sup>2</sup> or ourselves
  - Money
  - Gifts of significant value
  - Donations
  - Personal benefit of monetary value

# Don'ts

from existing or potential competitors, suppliers, vendors, customers or other third parties which have or are seeking to have business dealings with Coromandel.

- Receive any money, rebate or anything of value from any government official or agency for extending them any favourable treatment.
- c. Give any gift, other than the ones mentioned below, or make any illegal payment to an executive or employee of any supplier, vendor, contractor or competitor and it should not result in Coromandel obtaining an improper advantage.

Allowable gifts include:

- Business courtesies such as occasional Business meals or entertainment, which are of reasonable value.
- Guest House accommodation, if available, in connection with Coromandel's business.
- For any queries on whether a particular gift is acceptable or not, contact Head of HR.

### 1.7 Financial Records and Reports

a. Make wilful omissions or misleading transactions in the books and records of Coromandel, and no fund, asset or account of Coromandel may be established, acquired or maintained without being properly reflected in the books.

#### 1.8 Insider Trading

- a. Participate in insider trading, insider dealings and stock tipping activities.
- b. Proliferate insider information<sup>\*</sup> to outsiders, friends, relatives or derive any benefit, for ourselves or family, from the access to and possession of any material information about the Company.
- c. Trade in stocks of Coromandel or other Group Companies during the blackout periods declared by the Company, either by our immediate family or ourselves.

### Passion



We play to win. We have a healthy desire to stretch, to achieve personal goals and accelerate business growth. We strive constantly to improve and be energetic in everything that we do.

### II.1 Workplace Drive

- Be passionate about advancing Coromandel's common goal of bringing innovative products to the market place to constantly improve the life of the customer.
- b. Have a "can do" attitude and believe in making possibilities realities.
- c. Take pride in maintaining high standards of quality and continuously improving and excelling in work and behaviour.
- Strive to exceed the expectations of the role. Believe in your potential and maximise that potential.
- e. Have a passion for something that's fun, worth doing or never been done.
- f. Venture where others would not dare and provide distinctive, original and impactful work.
- g. Protect and promote the values driving the business.
- h. Say "no" to questionable business deals.
- i. Demonstrate passion and stand up for the Company's convictions.
- Use passion to activate minds, expand awareness and challenge thinking out of the conventional box.
- k. Make a difference in the communities where we operate, work and live.
- I. Fearlessly ask tough questions while searching for the best answers.
  - · Are we working on things we are truly good at?
  - Do our people go home at the end of the day emotionally charged or emotionally drained?
  - Will the projects we are working on today be remembered five years from now?
  - · Are we proud of the work we do?

If we can answer "yes" to these questions, we can cultivate the kind of passion that enables us to live more fulfilling lives, lead courageously, engage in work we are proud of and stride boldly into a successful future.

### II.2 Promote Innovation, Creativity & Freedom as a Way of Life

- a. Treat subordinates as individuals, encourage creative and innovative thinking among them and provide them the freedom necessary to demonstrate passion on the job.
- b. Share team relationships based on mutual respect and trust. Assume equal responsibility to achieve departmental objectives with a passion to win.
- c. Strive to arrive at innovative solutions for every problem.
- d. Reward and recognise creativity in public forums.

### **II.3 Workplace ambience**

 Ensure that the workplace is lively and releases positive energy so as to make it exciting and productive.

# Don'ts

### II.1 Workplace Drive

- a. Choose career paths to please others focus on what you enjoy doing.
- b. Stop striving for higher levels of excellence in all areas of work.
- Avoid challenging goals they present opportunities to discover true potential.
- d. Refrain from supporting colleagues if they fail despite giving their best encouragement may help them succeed the next time.
- e. Allow indiscipline and discouragement to pervade the work culture.
- f. Neglect upholding the Company's values in all aspects of work life.
- g. Be late for duty.
- h. Allow a day to pass without achieving something.

### II.2 Promote Innovation, Creativity & Freedom as a Way of Life

 Be afraid to think differently, innovate and make a positive difference at work.

### **II.3 Workplace ambience**

- a. Compromise on the need for a safe work environment.
- b. Treat employees without dignity and respect.
- c. Make the workplace dull and routine.

### Quality



We take ownership of our work. We unfailingly meet high standards of quality in both what we do and the way we do it. We take pride in excellence.

### III.1 Commitment to Quality of Products

- a. All Coromandel's products sold in the market should meet the statutory norms as applicable to the product.
- b. Customer satisfaction, trust and goodwill are of utmost importance to Coromandel and hence their opinions, concerns and enquiries regarding our products should be attended to on a priority basis.
- c. Be courteous to all customers. Customer dissatisfaction and complaints should be addressed promptly and courteously.

### **III.2** Accurate Advertising

- a. Any advertising done by Coromandel, either for its products or services, for Company brand building or for recruitment purposes should be accurate, honest and not misleading.
- b. Design creative and innovative advertisements to promote Coromandel's products.
- c. Any claim made towards the performance or any other attribute of any of Coromandel's products should be supported and substantiated by clinical and field trial results, wherever possible.
- Adhere with all legal requirements regarding trademark rights and competitor infringement policies.
- e. In case of product endorsement, secure signed documents from the endorsers attesting to their experience with our products, prior to the release of such communication.

### Don'ts III.1 Advertising

- Showcase Coromandel's advertisements in media that have anti-social or anti-national undercurrents.
- Stereotype individuals or portray/depict competition or any community, race, religion or gender in a demeaning or ill-humouredly manner, either directly or indirectly in our advertisements.
- c. Resort to puffery<sup>4</sup> while advertising Coromandel's products.
- d. Plagiarise well known slogans or advertising themes.

### Respect



We respect the dignity of every individual. We are open and transparent with each other. We inspire and enable people to achieve high standards and challenging goals. We provide everyone equal opportunities to progress and grow.

### IV.I Value Employees as Organisational Assets

- Demonstrate Coromandel's commitment towards caring for its employees by promoting a culture of recognition of individual and team achievements.
- b. Employee practices and policies should ensure equal opportunities for all employees and all qualified applicants for employment, without any discrimination on the basis of race, religion, gender, age, caste, region, marital status or a disability unrelated to the requirement of the position.
- c. Show respect for human dignity irrespective of grade and designation.
- d. Respect the importance of work-life balance.
- Recognise the value of a diverse workforce and respect, appreciate and value individual differences.
- Regularly counsel subordinates and discuss with them about their work related problems and provide necessary developmental support.
- g. Respect individual privacy and dignity of employees and acquire only that personal information that is statutory or as required by Coromandel's HR Process Manual.
- Prohibit any act of harassment of Coromandel employees, whether physical, verbal or psychological.
- Adhere to the Whistle Blower Policy and Sexual Harassment Prevention Policy.

### IV.2 Respect Employee Fundamental Rights

 Respect employee participation in lawful associations and encourage discharge of their fundamental and constitutional rights and duties.

#### IV.3 Climate of Team Spirit, Trust and Mutual Respect

- a. Our dealings with peers, subordinates and superiors should be governed by an overriding commitment to Coromandel's success. Company priorities supersede all individual and functional priorities.
- As peers, fulfill responsibilities as a member of a winning team and provide requisite support to other team members to achieve mutual objectives.

- c. As superiors, facilitate setting of objectives and clearly define the standards of performance desired and create an open, fearless environment that is conducive to team work.
- As subordinates, demonstrate an attitude of ownership to tasks and promote team spirit and inquisitiveness for knowledge.

### IV.4 Workplace Ambience

- Be punctual for all official engagements i.e. arriving on time for work, arriving on time for all official meetings.
- b. Strive towards meeting ergonomically prescribed standards in the workplace.
- c. Keep mobile phones in non-disturbing or silent mode during office hours and in office premises and maintain adequate decibel levels while conversing over phone so as not to disturb others.
- Keep mobile phones in a silent mode or non-disturbing mode during meetings/presentations.
- e. As a brand ambassador of Coromandel, uphold Coromandel's image by conducting yourself properly in public. Dress appropriately on working days and for official/business meetings & get-togethers in a manner consistent with the dress standards of the location or the specified dress code.

Appropriate dressing: Corporate office – Business formals Units – Plant uniform

f. Comply with all applicable health and safety policies to eliminate workplace hazards and provide a safe, healthy and stress free work environment for employees.

### IV. 5 Culture of Openness

- a. Practice an open culture across the organisation both in letter and spirit.
- b. Practice an open door policy.
- c. Foster a culture of informality and refer to others on a first name or surname (with appropriate title) basis, whichever is comfortable with the employee, instead of addressing or referring by designation.

d. Share information about Coromandel's business developments and key happenings on a need to know basis with everyone in the organisation.

### IV.6 Protect and Prevent Misuse of Coromandel's Assets

a. Employ Coromandel's tangible, intangible and IT assets only for conducting the business for which they are duly authorised, other than those provided as benefits and should not be used for any personal/outside work.

Tangible Assets (illustrative): includes equipment and machinery, facilities, transport, raw materials, unfinished product, unsold inventory, office space, corporate credit cards etc.

Intangible Assets (illustrative): includes proprietary information, trade secrets, goodwill, customer and supplier relationships, IPR etc.

IT Assets (Illustrative): includes all personal computers, laptops, network servers and all other associated computer hardware and software technologies, voice mail and voice systems, Coromandel's Intranet and Internet access etc that is owned, leased or rented by Coromandel.

- All Coromandel employees, agents and contractors should protect and prevent misuse of all Company assets and ensure that assets are not misappropriated.
- c. Care for the equipment provided by Coromandel for our efficient and effective working. Use it responsibly and take precautions to protect it from theft or damage. Return all equipment at the time of separation from Coromandel.

### Don'ts

#### IV.1 Employees as Organisational Assets

 Be a party to any act of sexual harassment of Coromandel employees, customers or outside vendors, whether physical, verbal or psychological.

#### **IV.2 Workplace Ambience**

- Solicit or promote support for any cause or organisation by distributing or circulating any literature or printed material during the official working time.
- b. Conduct Coromandel's business under the influence or possession of alcohol, illegal drugs or controlled substances.
- c. Carry any weapons or firearms on Coromandel premises, including in vehicles or on other private property that may be visited while conducting Coromandel'sbusiness.
- Enter any Coromandel manufacturing facility without requisite safety equipment.

#### IV.3 Culture of Openness

a. Promote hierarchical differences as hindrances for open communication.

### Respect

### Don'ts

### IV.4 Use of Coromandel's Assets

- a. Use Coromandel's IT or communication assets for promoting discriminatory, offensive, defamatory or threatening messages or downloading and viewing pornographic material or for sharing Coromandel's confidential and proprietary information, trade secrets, IPR etc.
- b. Destroy information belonging to Coromandel or carry Coromandel's proprietary assets, training material provided by the company, software installations or packages and any other such material at the time of terminating employment with Coromandel.
- Cause security breaches in computers, networks, websites and other hardware and software applications.
- d. Use unauthorised software in Coromandel's IT resources.

# Responsibility

We are responsible corporate citizens. We believe we can help make a difference to our environment and change lives for the better. We will do this in a manner that befits our size and also reflects our humility.

# Do's

### V.1 Good Corporate Governance to Protect Shareholder Value

a. Coromandel is committed to serve the best interest of shareholders and enhance shareholder value by protecting their investments and providing a consistent growth and fair rate of return on their investment.

#### V.2 Public Representation and Response to Media Queries

- a. Only specifically authorised directors and employees authorised by the Managing Director shall disclose Company and business information to public constituencies such as media, financial community and shareholders.
- b. Any Company Press Release should go only from the desk of the Managing Director or any person authorised by him/her.

### V.3 Endeavour to further National/Societal Interests

a. Coromandel is committed in all its activities to benefit the economic development of the nation in which it operates and strives to make a positive contribution to the achievement of objectives and priorities of the nation's government.

### V.4 Concern for Environment reflected in Product and Packaging

- Continuously endeavour to develop new and enhanced products without unfavourably impacting the environment.
- b. Use, wherever practicable, product-packaging material that is eco-friendly, recyclable or biodegradable.

### V.5 Concern for Environment reflected in managing Manufacturing Facilities

- a. Coromandel's facilities should have a defined SH & E policy and adherence to statutory norms and compliance with systems is mandatory.
- b. The effluents and stack emissions from the manufacturing processes at all our facilities should comply with respective PCB norms for air, water and land and where specifications are not defined, internal specifications should be developed.
- c. Prevent wasteful use of natural resources and ensure safe disposal of all hazardous waste and communicate with all local communities the environmental safety of our operations.
- Make efforts to improve energy efficiency in existing operations and in new equipment and facilities.

# Do's

### V.6 Concern for Environment reflected in Business/Workplace Decisions

- Regularly evaluate the safety, health and environmental conditions at all offices and facilities.
- b. The top management should review all existing and potential SH & E issues before making any acquisitions or entering into joint ventures.
- c. Use, wherever possible, recyclable or biodegradable office accessories, furniture and stationery such as printing paper, teacups, notebooks, carpets etc.

### V.7 Avoid Conflict of Interest of Employee and Coromandel's Interests

#### Industry Acquaintance

- a. If any member of our immediate family is a competitor or supplier of Coromandel or is employed by one, then such situations should be reviewed with the respective Functional Head in consultation with the Head of Management Audit to assess the nature and extent of any concerns and how they can be resolved.
- b. Notify and obtain approval from Functional Head / Managing Director before doing transactions / business or making any decisions on Coromandel's behalf with any company, supplier, vendor or competitor in which we or an immediate family member may in any way benefit from our actions.

### V.8 Protect Coromandel's Trade Secrets' and Proprietary Information\*

- Maintain the confidentiality of all proprietary information and trade secrets, whether patented or not, that gives Coromandel an opportunity to obtain an advantage over competitors.
- b. Enter into a confidentiality agreement, when disclosing any proprietary / confidential information or trade secrets to vendors, consultants, service providers or joint venture participants, that secrecy of all such information will be maintained.
- c. Ex-Coromandel employees are required to protect all proprietary information or trade secrets till such information comes in to the public domain.

<sup>5.</sup> Trade Secrets - All forms and types of linancial, business, scientific, technical, economic or engineering information, whether langible or intangible, and whether orhowstoredor compiled, if it is kept secret by the owner and derives independent economic value from not being generally known and not ascertainable throughproper means

Proprietary information - Material and information such as trade secrets, confidential commercial or financial information associated with a company's products, business, or activities, on which the company/management has property right and have been marked as 'company confidential information'.

# Do's

### Illustrative examples of information that qualify as proprietary information:

### Business

Potential Merger, Acquisition, Expansion or Divestment Plans, Business Restructuring Plans. 3+1+3 Business Plan, Balanced Scorecard, Policy Deployment charts of employees, Annual Budgetary Estimates, Sales Projections, Raw Material Costs, Supplier and Customer information, SAP Reports, Copyright Documents.

### Financial

Capital expenditures, raising or buying back equity capital, issuing/retiring debt, cost structures, profits, earnings and proposed dividends.

### Sales/Marketing

New product developments, proposed promotion and advertising campaigns, product launch, marketing and distribution strategies, dealer policies, market research data, customer requirement/preferences and personal information, product pricing information.

### Production

Plant design, Input parameters, R&D reports, product formulas, in-house production improvements.

#### Patents

All unpublished product/process/material patent data.

# Do's

### V.9 Steps to be taken to preserve information confidentiality (Illustrative)

- Ensure all confidential documents on our desk are covered or locked before we leave our workstation.
- b. Shred sensitive documents that are no longer needed.
- c. Erase whiteboards in conference rooms after the meeting is over.
- d. Label extremely confidential documents as "Confidential Coromandel Proprietary Information" and keep a central record of all such 'confidential' marked documents. Computer disks containing confidential information should be treated with the same degree of care as confidential papers.
- Lock computer before leaving workstation. Confidential information should be kept password protected.

#### V.10 Cooperation with other Murugappa Group Companies

- Cooperate with other Murugappa Group Companies by sharing physical, human and management resources.
- Ensure that the business decisions and strategies of Coromandel and our actions and activities are not in conflict with Murugappa Group's business interests.
- c. Give preference to other Group Companies for procurement and selling of products and services, as long as the terms are competitive, relative to third parties.

### Don'ts

### V.1 Public Representation and Response to Media Queries

- a. Entertain any requests for data or queries regarding Financial or Business information, which is not publicly available, from print or electronic media or financial community. Refer such queries to the Company Secretary / Functional Head / Managing Director.
- b. Agree for interviews in print and electronic media relating to Coromandel without informing the Functional Head / Managing Director.

### V.2 National/Societal Interests

- a. Engage in any activity or undertake any project that would be detrimental to the nation's interests, or have an adverse impact on the social and cultural life patterns of its citizens.
- b. Use child labour for any activity within the Company.

#### V.3 Business/Workplace Decisions affecting Environment

- Waste natural and scarce resources such as water, electricity, paper, food etc.
- b. Litter the office environment and ensure clean office surroundings.

#### V.4 Conflict of Interest of Employee and Coromandel's interests

 Engage in any business, relationship, association or activity which detrimentally conflicts or appears to conflict with the best interest of the Company.

#### V.5 Competing against Coromandel

a. Agree to do any work for a competing organisation, while still on Coromandel's rolls, without the Managing Director's approval.

#### V.6 Employee and Supplier Hats

- Be a supplier or vendor to Coromandel or represent a supplier or vendor to Coromandel while we are employees of Coromandel.
- b. Work for a supplier or a customer while working for Coromandel (does not include secondments), or provide any assistance to any supplier or vendor even after work hours that may adversely affect our performance or judgment on the job.

### Don'ts

#### V.7 Financial Interests and Investments

a. All employees buying shares of the Group Companies, should take approval of the respective Group Company before buying the shares.

### V.8 Coromandel's Trade Secrets and Proprietary Information

- Use Coromandel's proprietary information for own benefit or disclose it to outsiders.
- Ex-Coromandel employees should not carry any printed documents or records carrying such proprietary information at the time of termination of their association with Coromandel.
- c. Share or provide proprietary information/trade secrets of Coromandel to competition in the event of leaving Coromandel and joining competition, till the time the information comes in to public domain.

### V.9 Steps to be taken to Preserve Information Confidentiality (Illustrative)

- a. Discuss confidential documents over speakerphones or in public places.
- b. Discuss Coromandel's proprietary information with family members, relatives or social acquaintances.
- c. Take part in any survey, data collection or benchmarking exercise without the approval of the Functional Head.
- d. Leave documents and other material unattended in conference rooms.
- e. Retain confidential documents with us after their use for work is over, or provide them to third parties in the absence of a written confidentiality agreement.
- f. Share computer password with others outside workgroup unless required.

Amari

Dr. K. Pradeep Kumar EVP and Head of HR

### Coromandel Guide to Business Conduct





