



## GRAPHITE INDIA LIMITED

REGD. & H.O.: 31, CHOWRINGHEE ROAD, KOLKATA - 700 016,  
W.B., INDIA PHONE: 91 33 4002 9600, 2226 5755 /4942 / 4943 /  
5547 / 2334, 2217 1145/ 1146 FAX: 91 33 2249 6420, E-mail:  
gilro@graphiteindia.com WEBSITE www.graphiteindia.com, CIN:  
L10101WB1974PLCO94602

### Code of Conduct

- (a) Act in good faith in order to promote the objects of the company for the benefit of its members as a whole, and in the best interests of the company, its employees, the shareholders, the community and for the protection of environment.
- (b) Exercise duties with due and reasonable care, skill and diligence and shall exercise independent judgment.
- (c) Not involve themselves in situations which they may have a direct or indirect interest that conflicts, or possibly may conflict, with the interest of the company.
- (d) Not achieve or attempt to achieve any undue gain or advantage either to themselves or to their relatives, partners, or associates and if any person is found guilty of making any undue gain, he shall be liable to pay an amount equal to that gain to the company.
- (e) Unless otherwise approved in writing by GIL, not assign their office and any assignment so made shall be void.
- (f) Disclose personal interests that conflict with the interests of GIL and not participate in discussion and voting on such matters.
- (g) Not engage in any conduct which is likely to bring discredit to GIL.
- (h) Not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board of Directors of GIL or required by law.
- (i) Protecting company's assets, resource & data

### Assets

1. Assets should not be removed from the company & should be maintained in a manner where its life is extended & should be tallying location wise with the company register.
2. If an asset moves from one factory to another the concerned employee should ensure that the asset is not lost, no harm is done and it should generate the same efficiency and revenue, as it was doing in the earlier factory.



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3. Buildings should be maintained without defacing them. It should not be rented or leased away without adequate prior authorization .
4. Land should be maintained in a manner that the utility of the land is not diminished.
5. For immovable assets constant vigil should be there that no one should do anything to diminish the life of any asset.
6. Any movable asset going out of the factory premises should be done only by the permission of the highest authority. The permission should also state the reason for being taken outside.

### **Accuracy of books and records and public disclosure**

- The concerned employees should take care that the books and records are accurate and , accounting is done as per accepted accounting standards and that all of the business transactions are properly authorized.
- All Financial public disclosures should only be done by authorized employees and should be done without violating applicable rules and regulations

### **Resources:**

1. It is the duty of each employee that whatever resource has been given to him/her should be utilized for official work and for the benefit of the company.
2. No data should be leaked from the company by using the electronic channels/ any other methods.

### **Data Privacy:**

1. It is the duty of every employee to ensure data security and privacy. The sensitive data cannot be shared unless there is an authorization from superior or an order from the court of law.
2. It should be the duty of the employee to see that any email outreach should not be adverse to the interest of the company, both in terms of contents and addressee.



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### **Positive Work Environment**

- For everyone to do their best work on behalf of the company, all employees should all do their part to maintain a respectful work environment where everyone feels safe and productive.
- The employees should be honest, take responsibility for their assignment and generate trust within and outside the company
- The success is dependent on establishing a workplace culture free from discrimination, violence, harassment and other negative influences.
- The employees should take particular care of protecting environment in carrying out their duties

### **Duties to stakeholders**

- A company's reputation is everything and we should act responsibly in dealings with our customers, clients, suppliers, investors, other stakeholders and competitors. Especially employees should treat marginalized and vulnerable stakeholders in a manner that does not belittle them.

### **Gifts and Entertainments**

- Employees are prohibited from accepting gifts from Stakeholders, unless
  - Such gifts relate to special days like Christmas, Diwali etc. which has been the corporate legacy practice .
  - Gifts received from important stakeholders on special occasions. In any case disclosure of such gifts must be made to the appropriate people in the hierarchy.
- Employees should not involve themselves in any Entertainment with Stakeholders unless
  - Such entertainment is deemed necessary for better business relationship and/or for acquisition of business



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- All such entertainment should have prior authorization from appropriate hierarchical authority in the company.

**DATE: 24.10.2024**

**A. DIXIT**

**EXECUTIVE DIRECTOR**