



ZIRAN INDIA

PLOT NO:-D-89, MIDC, MIRAJ, MAHARASHTRA, INDIA

BUSINESS ETHICS POLICY

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Document Control	Details
Document Owner	Management / Compliance
Approval Authority	Managing Director
Applicable Scope	All establishments of Ziran India Ltd.
Review	Periodic review through the management-system review process

1. Purpose

To establish and maintain ethical business practices, legal compliance, integrity, accountability and responsible conduct throughout Ziran India, while preventing fraud, money laundering, anti-competitive practices, corruption, breaches of trust and conflicts of interest.

2. Scope

This policy applies to all establishments of Ziran India Ltd. and to employees and other persons acting on behalf of the company where their conduct may affect the company's ethical or legal obligations.

3. Policy Commitments

- Comply with applicable laws, regulations and relevant industry requirements governing Ziran India's activities.
- Conduct business with transparency, integrity and accountability.
- Prevent and promptly address fraud, money laundering, anti-competitive practices, corruption, breaches of trust and conflicts of interest.
- Provide channels for reporting concerns and ensure reported matters are investigated and addressed appropriately.
- Promote ethical conduct through communication, training, audits and management oversight.

4. Ethical Business Requirements

4.1 Legal Compliance

Ziran India shall maintain a culture of compliance and shall identify, evaluate and address applicable legal and regulatory requirements. Compliance risks shall be considered through audits, assessments, training and management review.

4.2 Fraud Prevention

Intentional deception using company resources or while on duty, for an unfair or illegal advantage, shall be treated as an ethical breach and reported. Reported incidents shall be documented as nonconformities and handled through correction, root-cause analysis, corrective/preventive action and learning.

4.3 Prevention of Money Laundering

Activities intended to conceal the origin, ownership or destination of illegally or dishonestly obtained money by presenting it as legitimate shall not be permitted. Suspected or reported cases shall be documented and handled through the nonconformity process, with legal assistance obtained where required.



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4.4 Prevention of Anti-competitive Practices

Employees shall not use company resources or their position to improperly restrict competition or maintain or increase market position through abusive or dominant practices. Suspected cases shall be reported and handled through the established nonconformity process.

4.5 Prevention of Corruption and Breach of Trust

Offering, promising, giving, accepting or soliciting a bribe in cash or kind is prohibited. Suspected or reported corruption or breach-of-trust matters shall be reported to the appropriate senior person, documented and addressed through correction, root-cause analysis, corrective action and preventive learning.

4.6 Conflict of Interest

A conflict of interest exists where an individual's duties or decisions may conflict with private interests. Such situations shall be reported to the immediate senior. The concerned person shall not take the affected decision on behalf of the company; responsibility shall be assigned to another competent person. Failure to disclose a conflict shall be handled through the nonconformity process.

5. Reporting and Investigation

- Employees are encouraged to report suspected ethical or legal concerns promptly through the available reporting channels, including the applicable whistle-blower mechanism.
- Reported matters shall be recorded and assessed for appropriate action.
- Investigations shall be conducted objectively and with appropriate confidentiality.
- Where a matter constitutes a nonconformity, the applicable nonconformity, corrective-action and preventive-action processes shall be followed.
- Legal assistance shall be obtained where the circumstances or legal requirements warrant it.

6. Training and Awareness

Employees shall receive appropriate awareness and training on applicable laws, ethical requirements and the expectations of this policy. Training and communication shall support a culture of compliance and ethical conduct.

7. Monitoring and Management Review

- Compliance audits and assessments shall be used to identify and address compliance risks.
- Reported ethical incidents and related corrective actions shall be monitored through the applicable management-system records.
- Recurring issues, significant risks, corrective actions and improvement opportunities shall be considered during management review.

8. Records

- Compliance audit and assessment records
- Training and awareness records
- Reported ethical incident / nonconformity records
- Root-cause analysis and corrective/preventive action records
- Relevant management review records



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9. Objectives

- Maintain legal compliance across applicable Ziran India operations.
- Prevent fraud, money laundering, anti-competitive practices, corruption and breaches of trust.
- Prevent conflicts of interest and ensure timely disclosure and management of identified situations.

10. Responsibilities

- Management: provide direction, resources and oversight for ethical business conduct.
- Managers / Department Heads: promote compliance, receive or escalate concerns and ensure appropriate action.
- Employees: comply with this policy, complete required training and promptly report suspected violations or conflicts of interest.
- Compliance / Quality function: support monitoring, documentation, investigation coordination and continual improvement.

11. Continual Improvement

Lessons from reported incidents, audits, assessments, corrective actions and management reviews shall be used to strengthen controls, awareness and ethical business practices.

12. Approval

Prepared / Compiled By – HSE / Admin Coordinator	Approved By
	