

# BUSINESS ETHICS POLICY

REV. No. 02

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## INTRODUCTION

Recognizing the fundamental significance of ethical conduct in shaping both business operations and societal impact, JMF PERFORMANCE MATERIALS PVT LTD. remains unwavering in its dedication to Ethical Governance as a core component of our corporate ethos. We acknowledge that ethical governance transcends mere adherence to regulatory mandates; it serves as a bedrock principle of accountable corporate behaviour, vital for fostering sustainable progress and cultivating enduring confidence among stakeholders.

In the ever-evolving landscape of warehouse management, our approach to Ethical Governance is intricately woven into our comprehensive Integrated Governance Policy. We pledge to systematically address critical governance issues pertinent to our warehouse operations, including but not limited to transparency, fair labor practices, and responsible data management.

Our strategic endeavours are meticulously crafted not only to meet but to surpass prevailing regulatory standards, thereby establishing a pioneering standard for ethical conduct within the warehouse management domain. At JMF PERFORMANCE MATERIALS PVT LTD., we not only acknowledge the paramount importance of ethical governance but actively embed it into our corporate culture. Our commitment to exceeding regulatory norms and addressing key governance challenges positions us as leaders in championing ethical behaviour and promoting responsible business practices.

## SCOPE

This Policy applies to the below mentioned sites and all of its employees, workers, sub-contractors, and other stakeholders:

Sr. No.	Name of Site	Address
1	Bhiwandi Warehouse	D6, 10 To 15, Bhagwan Seth Estate, Purna, Bhiwandi 421302 & B3 Gala No.12, Gayatri Complex, Village Val, Bhiwandi, Thane, Maharashtra, 421302.
2	Chennai Warehouse	WH No.14 at DCB Group, 35/2A & 36/2B2, Sothupakkam Road, Sothupakkam, Redhills, Chennai, Tamil Nadu, 600052.
3	Faridabad Warehouse	Plot No. 12/66, Baba Deep Singh Ji Shaheed Marg, NIT Industrial Area, Opp. Govt. Press Colony, Faridabad, Haryana, 121001.
4	Nariman Point Office	6th Floor, 609, Raheja Centre, Free Press Journal Marg, Nariman Point, Mumbai, 400021.
5	Thane Office	9th Floor, Unit No. 910, B-Wing, Lodha Supremus - II, Plot No. F-4 & F-4/1, MIDC Road No. 22, Wagle Estate MIDC, Thane (W), Maharashtra, 400604.
6	Delhi Office	501, Sethi Bhawan, East Patel Nagar, Rajendra Place, New Delhi, 110008.

## POLICY STATEMENT

We are committed to upholding strong ethical standards and promoting fairness, honesty, and accountability in all stakeholder interactions. This commitment is evident in our comprehensive policies that oversee corporate behaviour, anti-corruption initiatives, fair competition, responsible information handling, and engagement with stakeholders. In line with various business ethics issues, we have shared our aim and specific target of improvement as compared to baseline calendar year 2022.

## OUR COMMITMENTS

- ◆ It is our aim to prevent corruption and unethical practices by establishing robust anticorruption policies and promoting a culture of integrity and transparency.
- ◆ Our aim is to minimize fraud risks and protect company assets by implementing internal controls, conducting regular audits, and fostering a culture of accountability.
- ◆ Our aim is to identify and manage conflicts of interest to ensure fair and impartial decision-making processes.
- ◆ It is our aim to prevent financial crimes such as money laundering and embezzlement by implementing stringent financial controls and compliance measures
- ◆ Aim is to safeguard sensitive information and ensure compliance with data protection regulations by implementing robust data security measures and employee training programs.
- ◆ Aim to uphold fiduciary responsibilities and act in the best interests of stakeholders by adhering to ethical financial management practices.
- ◆ Aim to encourage whistleblowers to come forward with information about unethical behavior or wrongdoing by providing a safe and confidential reporting mechanism and protecting whistleblowers from retaliation.
- ◆ Foster a sense of personal accountability for information security, cultivating a workforce that actively adopts best practices and remains vigilant against potential threats.

## GOALS

Below Goals are in alignment with our ESG KPI Roadmap for the year 2030 and are kept keeping in mind the baseline year of 2022.

- ◆ Achieve zero incidents of corruption-related offenses through regular training and strict enforcement of anti-corruption measures by year 2030
- ◆ Ensure 100 % universal employee engagement in anti-corruption training initiatives by 2030
- ◆ Target full disclosure of conflicts of interest through routine training, aiming for an 100% compliance rate by 2030.

- ◆ Ensure Zero fraud incidents through enhanced fraud detection mechanisms and employee awareness programs by year 2030.
- ◆ Resolve conflict of interest cases within 30 days of identification to mitigate potential risks and maintain stakeholder trust till year 2030.
- ◆ Achieve 100% compliance with financial regulations and report zero instances of financial crime through regular audits and monitoring by 2030.
- ◆ Maintain a data breach incident rate at 0 % annually through continuous monitoring and enhancement of data protection protocols by year 2030.
- ◆ Achieve 100% compliance with fiduciary duties regulations and report zero instances of breach through regular audits and oversight by year 2030.
- ◆ Ensure 100% confidentiality and non-retaliation for whistleblowers and resolve reported cases within 60 days to maintain trust in the whistleblower protection system.

### COMPLIANCE & ETHICS FRAMEWORK: BEST PRACTICES AND AVOIDANCES:

Area of Focus	Best Practices	Avoid
<b>Anti-Corruption</b>	<ul style="list-style-type: none"> <li>• Follow anti-corruption policies.</li> <li>• Report bribery/unethical practices.</li> <li>• Complete anti-corruption training.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not offer/accept bribes.</li> <li>• Do not conceal unethical behavior.</li> <li>• Do not falsify records.</li> </ul>
<b>Fraud Prevention</b>	<ul style="list-style-type: none"> <li>• Implement internal controls.</li> <li>• Conduct audits and risk checks.</li> <li>• Report suspected fraud immediately.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not commit fraud or misrepresentation.</li> <li>• Do not bypass controls.</li> <li>• Do not ignore warning signs.</li> </ul>
<b>Conflict of Interest</b>	<ul style="list-style-type: none"> <li>• Disclose actual/potential conflicts promptly.</li> <li>• Follow company procedures to resolve conflicts.</li> <li>• Seek approval before external engagements.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not make decisions for personal gain.</li> <li>• Do not hide conflicts.</li> <li>• Do not engage with competitors without approval.</li> </ul>
<b>Money Laundering &amp; Financial Crime</b>	<ul style="list-style-type: none"> <li>• Conduct due diligence on clients/partners.</li> <li>• Keep accurate financial records.</li> <li>• Report suspicious transactions.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not approve transactions without valid purpose.</li> <li>• Do not ignore suspicious activity.</li> <li>• Do not evade reporting requirements.</li> </ul>
<b>Information Security &amp; Data Protection</b>	<ul style="list-style-type: none"> <li>• Follow security protocols.</li> <li>• Use strong passwords &amp; multi-factor authentication.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not share sensitive data with unauthorized persons.</li> <li>• Do not use unsecured</li> </ul>

	<ul style="list-style-type: none"> <li>• Report breaches or phishing attempts.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not bypass security protocols.</li> </ul>
<b>Fiduciary &amp; Ethical Financial Management</b>	<ul style="list-style-type: none"> <li>• Adhere to ethical financial practices.</li> <li>• Participate in audits &amp; compliance programs.</li> <li>• Ensure transparent reporting.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not misuse company funds/resources.</li> <li>• Do not conceal fiduciary breaches.</li> <li>• Do not prioritize personal gain over stakeholders.</li> </ul>
<b>Whistleblower Protection</b>	<ul style="list-style-type: none"> <li>• Encourage reporting via confidential channels.</li> <li>• Cooperate with investigations.</li> <li>• Protect whistleblowers from retaliation.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not retaliate against whistleblowers.</li> <li>• Do not ignore reports of wrongdoing.</li> <li>• Do not disclose identities outside authorized channels.</li> </ul>

### DISCIPLINARY MEASURE

JMF PERFORMANCE MATERIALS PVT LTD enforces strict actions for violations of the Ethics Policy to ensure accountability, integrity, and ethical behaviour.

Verbal or Written Warning:

Issued for minor or first-time offenses. Employees receive a formal warning outlining the violation and corrective actions to prevent recurrence.

Suspension:

Temporary removal from duties for repeated or serious violations. This may also apply if unethical behavior is not reported.

Termination:

Immediate dismissal for severe misconduct, such as fraud, bribery, corruption, or conflicts of interest that harm JMF's integrity or reputation.

Legal Action:

Legal proceedings may be initiated for violations that breach laws, including fraud, money laundering, or corruption. Authorities may also be notified.

Restitution/Financial Penalties:

Responsible parties may be required to repay losses from financial misconduct. Contractors or partners may face additional financial penalties.

Training and Rehabilitation:

Correctable violations may require ethics training or participation in rehabilitation programs to reinforce understanding and prevent recurrence.

### HARMONIZING ETHICAL PRACTICES WITH SUSTAINABLE DEVELOPMENT GOALS

At JMF Performance Materials Pvt Ltd, our business ethics policy aligns with the following given SDGs.



### GOVERNANCE PROCEDURE

#### 1. Managing Director

Responsibilities:

- Set strategic Business Ethics goals in alignment with the company's mission.
- Approve and provide resources for such initiatives.
- Monitor overall compliance and risk management.

#### 2. Human Resource Manager

Responsibilities:

- Implement and manage the Business Ethics policy at operational levels.
- Regular training and communications to ensure staff awareness and engagement.
- Monitor day-to-day performance and compliance.

#### 3. Legal Compliance Officer

- Review the policy at regular frequency
- Developing compliance programs and initiatives.
- Ensuring adherence to local, national, and international laws.
- Acting as the primary contact for regulatory bodies.

### IMPLEMENTATION PROCESS

Policy Deployment: All employees will receive a copy of the Business Ethics policy. Regular workshops and seminars will be conducted to reinforce policy understanding.

Embed Ethical responsibilities into job descriptions and performance reviews.

### REPORTING

Compliance Officer (C.O.): The officer diligently records the following aspects within every deal and contract involving our material suppliers and the financing of product shipments:

- Any instances of payment made in a currency different from the one specified in the contract.
- Payments are directed to countries not linked to the contractual agreement.
- Transactions involving cash payments.
- Disbursements to individuals or entities not explicitly outlined in the agreement.
- Any other unusual or non-standard payment requests.

A detailed report enumerating the occurrence of such activities is meticulously compiled, submitted, and subsequently disseminated to stakeholders and company executives for review and discussion.

### REVIEW MECHANISM

This policy will be reviewed by the Legal Compliance Officer every two years to track the progress on every issue and its targets and same will be approved by Managing Director

### Revision History

Date	Changes
01/01/2023	New policy
01/01/2025	Updated commitments, goals and added a new topic.

APPROVED BY:



**Managing Director  
Vishal Jhunjunwala**

JMF PERFORMANCE MATERIALS PVT. LTD

Last Review Date : 01/01/2025

Next Review Date : 01/01/2027

EMPLOYEE ACKNOWLEDGMENT: BUSINESS ETHICS POLICY

I acknowledge that I have received, read, and understood the Ethics Policy of JMF Performance Materials Pvt Ltd. I am aware of the company's ethical principles and its commitment to preventing corruption, fraud, conflicts of interest, and ensuring compliance with anti-money laundering and antitrust regulations.

I understand my responsibility to uphold these standards and commit to reporting any violations through the appropriate channels.

I recognize that compliance with this policy is a condition of my continued employment or partnership with JMF Performance Materials Pvt Ltd.

Employee Signature:

A handwritten signature in black ink, appearing to read "C. E. Manke". The signature is written in a cursive style with a large, stylized initial "C" and "E".

Date : 02-01-2025