
CODE OF CONDUCT

1. Introduction

This Code of Conduct (“Code”) has been adopted by the Board of Directors to maintain the standards of business conduct for Tubestar and its subsidiaries (“the Company”). The Code is applicable to all the directors of the Company and all the employees of the Company collectively referred as ‘Officers’. ***The applicability of this code is further extended to include all the stakeholders, and other interested parties including suppliers and service providers .***

The Board appoints the Group Finance Controller as compliance officer for the purpose of this code.

The Board of Directors reserves the right to amend, alter or enlarge this Code at any time in line with relevant legal/other requirements.

All the interested parties including Tubestar officers shall conduct their activities in line with the following policies laid down by the Code and adhere and seek compliance thereto:

2. Principles and Conduct

A. Honest and Ethical conduct

The Officers shall deal on behalf of the company with professionalism, honesty and integrity.

B. Compliance with law

The Officers shall, in their business conduct, ensure compliance with all applicable laws, rules and regulations, in all the territories in which the Company operates and adhere to the reporting system thereunder.

C. Loyalty in employment

In consideration of employment with the Company, Officers have to devote their full attention to the business interests of the Company. Officers are prohibited from engaging in any activity that interferes with their performance or responsibility to the Company or is otherwise in conflict with or prejudicial to the Company.

D. Conflict of interest

The Officers shall not engage in any business, relationship or activity, which may detrimentally conflict with the interest of company.

E. Gifts and Donations

The Officers shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favours for the conduct of its business. However, Officers may accept and offer nominal gifts which are customarily given and are of commemorative nature for special events. In case of doubt, please speak to Group Finance Controller.

F. Government Agencies

The Officers shall not offer or give any company funds or property as donation to any government agencies or their representatives, directly or through intermediaries, in order to obtain any favourable performance of official duties.

G. Equal opportunities within the Company

The Officers shall ensure that equal opportunities are provided to all employees of the Company and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, age and nationality; and that no discrimination or exploitation is done in this regard.

H. Health, safety and environment

The Officers shall strive to provide a safe and healthy working environment, both within the organization and as part of the society and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory the Company operates in.

I. Use of the Tubestar logo

The Officers shall manage the use of the "Tubestar" logo in the manner authorized and in the best interest of the Company.

J. Protection of Assets

The assets of the Company should be employed for the purpose of conducting the business for which they are duly authorized, and they should not be misused.

K. Confidentiality

The Officers shall maintain confidentiality of information entrusted to them by the Company or any other information about the Company that comes to them except when disclosure is duly authorized or required by any law or regulation.

L. Reporting concerns

The Officers shall promptly report to the management, any actual or possible violation of this Code, or an event he or she becomes aware of that could affect the business or reputation of his/her or the company, to below email addresses:

hardik@tubestar.com; anandgv@tubestar.com

3. Violation of the Code

The Company will take appropriate action against any Officer whose actions are found to violate the Code or any other policy of the Company. Disciplinary action may include immediate termination of employment at the Company's sole discretion, along with legal actions, where necessary. In case the Company has suffered any losses, it may pursue for recovery of such losses against the individuals or entities responsible.

Disclaimer

The Code of Conduct is a statement of certain fundamental principles, ethics, values, policies and procedure that govern the Officers of the Company in the conduct of the Company's business. It is not intended to and does not create any rights in any way in clients, suppliers, shareholders and any other person or entity.



Hardik Mehta
Director