

GUJARAT INVESTA LIMITED

Code of Business Conduct and Ethics

Gujarat Investa Limited with its board of directors have summarized and adopted a Code of Conduct and ethics for business (the “Code”). Looking to multiple business activities, these standards do not cover every situation where ethical decisions could be made. However it has guiding principles that represent the Company’s policies.

The Company’s philosophy on Corporate Governance is based on transparent and effective governance. The company strives to maintain its image in the stakeholders by serving them.

The Board of Directors of the Company have adopted the code describing:

- Responsibility to comply with Insider trading regulations and applicable laws and regulations; and
- Procedure for annual affirmations to the Code of Conduct by Directors, Senior management and employees.

This Code is applicable to:

- a) All employees of the Company including senior management, and
- b) All directors of the Company

The Code of conducted so adopted are summarized hereunder:

- I) The Directors and Employees shall not be involved in any activity that would have any adverse effect on the interest of the Company or nation.
- II) The Company requires that its employees and Directors strictly comply with the applicable laws and regulations in the conduct of its business, both in letter and spirit. If the ethical standards set forth in this code are more rigorous than the applicable laws and regulations, then the standards of the Company’s Code shall prevail.
- III) A Director or the Employee and their relatives shall not derive any benefits or assist others to derive any benefit from the access to and possession of information about the company, which is non-public information. They should also comply with the SEBI (Prohibition of Insider Trading) Regulations, 1992 as also other regulations as may become applicable to them from time to time. They should contact

Compliance Officer with any questions about your ability to buy or sell of securities.

- IV) The Company attaches great importance to a healthy and safe working environment. The Company is committed to provide good physical working conditions and encourages high standards of hygiene and housekeeping. Particular attention should be made to preserve the natural resources and minimize the impact of its business operations on environment.
- V) Company is further committed to provide free working environment which will restrict unlawful harassment including sexual harassment and harassment based on age, national origin, caste, medical condition etc. Where the employee has been unlawfully harassed, he / she should file a complaint to the Compliance Officer.
- VI) The matters covered in this Code are of the utmost importance to the Company and its stakeholders. All Employees and Directors are expected to comply with all of the provisions of this Code in letter and spirit. The Code will be strictly enforced and violations will be dealt with immediately, including subjecting persons to corrective and / or disciplinary action such as penalty, dismissal or removal from office. Violations of the Code that involve illegal activity will be reported to the appropriate authority.
- VII) All the Directors and Senior Management personnel to whom the Code applies shall, within 10 days of close of every financial year affirm compliance with the Code indicating their continued understanding of and compliance with the Code. The duly signed Annual Compliance Declaration shall be forwarded to the Compliance Officer.