

Code of Conduct for Kotech Infra Pvt. Ltd.

Company Vision

At Kotech Infra, our vision is to be the world's leading provider of high-quality metal components for the construction industry, railway, defence, oil and gas industry, and aerospace. We are dedicated to delivering premium customer experiences through our commitment to innovation, sustainability, and excellence in every aspect of our business.

We envision a future where Kotech Infra is known for its exceptional products and services that meet the highest standards of quality, safety, and environmental sustainability. Our goal is to be the go-to long-term partner for our customers, offering a wide range of innovative solutions that cater to their specific needs and requirements.

We strive to maintain our position as a leader in the heavy steel manufacturing industry by investing in advanced technologies, processes, and equipment that enable us to produce high-quality metal components efficiently and sustainably. We are committed to reducing our environmental impact by promoting sustainability practices throughout our supply chain, manufacturing processes, and operations.

At Kotech Infra, we value our employees and are dedicated to providing a safe, healthy, and inclusive workplace that fosters creativity, collaboration, and innovation. We believe in investing in our employees' professional and personal growth, providing them with the training and resources they need to succeed.

Our vision is to continue expanding our business globally, building strong strategic partnerships with our customers, suppliers, and stakeholders. We believe that by staying true to our values of integrity, innovation, teamwork, and customer satisfaction, we can achieve our vision of becoming the world's leading provider of high-quality metal components. Made in India.

Code of Conduct

At Kotech Infra, we are committed to maintaining the highest standards of ethical conduct, legal compliance, employee responsibility, transparency, and social responsibility. Our code of conduct reflects our values, culture, and commitment to excellence.

Kotech Values and Culture At Kotech Infra, we value integrity, innovation, teamwork, and customer satisfaction. We strive to create a culture of openness, trust, and respect where every employee is empowered to do their best work. We believe that

our success depends on the collective efforts of our employees, partners, and customers.

Responsibilities and Organization

At Kotech Infra, we believe that upholding our code of conduct is the responsibility of every employee, from the CEO to entry-level staff. However, as the leader of the company, the CEO bears the ultimate responsibility for ensuring that the company operates ethically and complies with all applicable laws and regulations.

To ensure ongoing compliance and monitoring of our code of conduct, we have designated the general managers to oversee the implementation of our policies and procedures. They are responsible for ensuring that our employees understand and comply with our code of conduct, and for conducting regular reviews and assessments to identify areas of risk and opportunities for improvement.

The general managers work closely with all departments and employees to promote a culture of integrity and compliance, and to address any issues or concerns related to our code of conduct. They are also responsible for investigating any reported violations and taking appropriate corrective action when necessary.

Kotech Values and Culture

Kotech Infra's values and culture are deeply ingrained in our organization, guiding every decision and action we take.

Autonomy: We believe in giving our employees the autonomy to make decisions and take ownership of their work, enabling them to be creative and innovative.

Audacity: We encourage our employees to think big and be bold, to take calculated risks and embrace change in order to drive growth and innovation.

Fulfilling Commitments: We are committed to fulfilling our commitments to our customers, partners, and stakeholders, delivering high-quality products and services on time and on budget.

Product: We take pride in the quality and reliability of our products, using the latest technologies and processes to ensure they meet or exceed industry standards.

Service Capabilities: We are dedicated to providing exceptional customer service, leveraging our expertise and experience to deliver customized solutions that meet our customers' unique needs.

Culture: Kotech Infra's culture is the foundation of our success, enabling us to continuously improve and innovate for superior performance and reliability. We are committed to sustainable practices that prioritize the environment, while remaining cost-conscious and respectful of each other. We believe that inclusion brings new insights, and we encourage transparency, open communication, teamwork, and global cooperation to achieve our goals with a sense of urgency and a positive approach.

In conclusion, culture is vital to Kotech Infra, as it embodies our values, drives our performance, and enables us to achieve our goals while staying true to our commitment to sustainability and social responsibility.

Employee Policy

We are committed to providing a safe, healthy, and inclusive workplace for our employees. We promote equal opportunities, diversity, and fairness in all our employment practices. We respect the dignity, privacy, and personal rights of every employee and expect them to do the same for their colleagues.

Report violations to your nearest manager

At Kotech Infra, we encourage our employees to uphold our code of conduct and report any deviations from it. Our ethical hotline function provides a confidential platform for employees to report any violations of our code of conduct.

If an employee witnesses any violation of our code of conduct, they should report it to their nearest manager or use our ethical hotline function. Reports should include answers to the following questions: Who was involved? What happened? Where did it occur? Why did it happen? When did it occur? And how did it occur? Providing appropriate contact details is also important, as the identity of the reporter is assured to remain anonymous to everyone except the Kotech HR Manager.

It is important to note that we do not act on anonymous reports. However, we treat all reports with the utmost confidentiality and investigate each report thoroughly. Our goal is to maintain a culture of transparency, trust, and respect, and to uphold our commitment to ethical and legal compliance.

In conclusion, reporting violations of our code of conduct is essential to maintaining a positive work environment and upholding our values and culture. At Kotech Infra, we take all reports seriously and encourage our employees to speak up if they witness any deviation from our code of conduct.

Safety, Health, Environmental and Quality Policy

At Kotech Infra, we prioritize the safety and well-being of our employees, customers, and communities. We comply with all relevant health and safety laws, regulations, and standards. We strive to minimize our impact on the environment by using sustainable practices and reducing waste. We maintain high standards of quality in all our products and services.

Business and Financial Integrity

At Kotech Infra, we conduct our business with honesty, transparency, and integrity. We comply with all relevant laws and regulations related to financial reporting, accounting, and tax. We avoid any conflicts of interest, and we prohibit any form of bribery, corruption, or unethical business practices.

Principles of our Code of Conduct:

- 1. Legal Compliance**
We comply with all applicable laws and regulations in every country where we operate. We expect all employees to act in accordance with the law and report any illegal activity or violation of our code of conduct.
- 2. Ethical Business Practices**
We conduct our business with honesty, fairness, and transparency. We respect the rights of our employees, customers, and partners. We avoid any form of discrimination, harassment, or retaliation.
- 3. Employee Responsibility**
We expect all employees to act in a professional and ethical manner at all times. We provide training, guidance, and resources to help employees understand and adhere to our code of conduct. We encourage employees to report any suspected violations of our code of conduct.
- 4. Transparency**
We believe in transparency in all our business operations. We provide clear and accurate information to our stakeholders, including employees, customers, investors, and regulators. We maintain accurate records of all our transactions and operations.

Conclusion

This code of conduct reflects Kotech Infra's commitment to ethical, responsible, and sustainable business practices. We expect all employees to adhere to this code of conduct and help us maintain the highest standards of integrity and excellence. Any

violation of this code of conduct will be subject to disciplinary action, up to and including termination of employment.

Pune, March 23, 2023

Sumit Vise
CEO