

MEGHNA CEMENT MILLS LIMITED

CODE OF CONDUCT

Introduction

The commitment of the company is to maintain standards in its operations and dealings within the company and beyond. It has set the Code of Conduct as denoted hereinafter for the personnel employed within the company. This Code applies to all members who are in the payroll and in the management.

Conduct & Behaviour

- i. The obligation of all MCML personnel in the payroll and in the management, also termed as the staff members herein, are to follow the policies, rules and guidelines as set out and to be set out in future by the company.
- ii. Every staff member has to provide his/her services towards the company with – i. Integrity ii. Accountability; iii. Due commitment to responsibilities; iv. Protection and safeguarding of interest of the Company; v. Respectful to the laws, rules and regulations. vi. Discharge respective duties with prudence and ethics.
- iii. The staff members are to act with common decency, good faith, and honesty;
- iv. The staff members are to work to fulfill the duties of their position to the best of their abilities;
- v. The staff members shall discharge their duties and responsibilities duly as to achieve their individual objectives and deliverables;
- vi. The employees shall exercise his or her duty obligations to the interest of the company with integrity, objectivity, competence and due care; shall maintain confidentiality and exercise professional behavior with confidence and independence.
- vii. The staff members are to exercise ethical behaviour and maintain standards of conduct in their workplaces.

Abiding Laws, Rules & Regulations

- i. All employees at the MCML are to abide by the rules, regulations, policies, systems and procedures of the company.
- ii. In discharging and performing of their duties and activities, every employee of MCML must demonstrate integrity, due care and abide by the applicable laws, regulatory directives, rules, regulations of the country, local authority and of the organization under all circumstances.

- iii. The company shall maintain and uphold the utmost care and standard in the manner with which it runs its operations, by respecting all labor and environment laws and other applicable rules and laws.

Code of Confidentiality

- i. All employees at the MCML are responsible for ensuring that they use and handle confidential information in a secure and confidential way.
- ii. Unauthorised disclosure of confidential information to be considered as an offence and violation of code of conduct.
- iii. Any suspected or known breaches of confidentiality must be reported immediately to the appropriate authority immediately.
- iv. Confidential information can only be used for the purpose and interest of the company with proper authority and approval.

Working Environment

- i. The company shall maintain a healthy and safe work environment for the employees in its offices and factory.
- ii. The company's operations have to be done in a safe manner, following all applicable safety laws and regulations.
- iii. The company shall ensure that each office and factory of MCML -
 - to have a emergency preparedness plan, and ensure that the employees are familiar with emergency response requirements.
 - to strictly prohibit entry or use of illegal and/or unauthorized substances at work places, offices, and factories.
 - to strictly follow and comply with operational directives with necessary cautions & safety measures.
 - to strictly follow and comply with laws, orders, notifications.

Conflict of Interest

- i. The company prohibits that all the employees of MCML shall avoid situations in which an employee's personal interests conflict with those of MCML.
- ii. An employee shall not unduly use his/her official position for any personal gain or benefits or for the benefit of his/her relatives and/or close associates.
- iii. In case of any actual or potential conflict of interest, to immediately inform his/her higher reporting authority about such actual or potential conflict of interests.

Prohibition of Insider Trading

- i. The employees of MCML and any of its sister concerns are prohibited from using any "material," "nonpublic" and "price sensitive" information acquired personally and/or through others within the company, or through contact with clients or anyone it deal with in working within the company, its clients, suppliers or business partners, as to buy or sell any securities options etc.
- ii. It is a clear violation of the company's policy, ethical obligations and the law to engage in insider trading by any of the employees of the company.

- iii. The company also prohibits “tipping,” which occurs when one person provides material, nonpublic information to another person, and that person trades on the basis of the information to his or her benefit.

Relationships with clients and suppliers

- i. In their relationships with clients and suppliers, the employees are obliged to conform to the provisions of the code of ethics;
- ii. The employees of MCML shall comply with internal procedures relating to the management of relationships with the clients of the company;
- iii. The employees of MCML shall provide quality products and services that meet clients’ reasonable expectations and safeguard their safety and security;
- iv. The employees shall adopt necessary standards of correctness in communications within and outside of the company, whether official and/or commercial or other nature as the case may be.

Safeguarding Environment

- i. MCML recognizes the importance of environmental sustainability to the people, clients and the communities in which the company and its employees live and work.
- ii. The company leads to contribute positively to reduce, reuse and recycle the resources as required to operate its business, and to integrate sustainability into the business strategies, operations and processes.

Community Service

- i. MCML aimed to support the communities located in the area where it operate its production and business activities through participation in community activities.

Document & Records Preservation & Retention

- i. All official records of MCML are to be kept and maintained with due care and safety.
- ii. The company shall follow methodical systems and procedures to keep and maintain all its official records and documents in accordance with legal and business requirements and directives.

Diversity

- i. The company strived to nurture respectful, inclusive environment that encourages diverse individuals to thrive personally and professionally as full contributors to the success of the company and the clientele.