



CODE OF BUSINESS CONDUCT, ETHICS AND ANTI-BRIBERY POLICY

The Board of Directors of Neelansh Electrotech System Pvt Limited (the "Company") has adopted this Code of Ethics and Anti-Bribery Policy (the "Code" for all of the Company's employees, directors, officers, crew and agents ("Employees").

1. Basics regarding the Business Code of Conduct, Ethics and Anti-Bribery Policy

The Code of Business Conduct, Ethics and Anti-Bribery Policy (the "Code") is to commit its boards of directors (each "the Board"), principal officers, employees and all the workforce to the highest standards of business and ethical conduct. All employees, officers, directors and contractors (collectively referred to as "Employees" in this code) must follow and abide by this code.

2. 2.1. Code Fundamentals

The fundamentals represent the basic beliefs that the Company aspires to and they should be reflected in actions of all Employees at all times.

The Company's fundamentals are:

1. Complying with Laws

All Employees should respect and comply with all of the laws, rules and regulations of the countries and jurisdictions in which the Company conducts its business.

2. Conflicts of Interest

All Employees should be scrupulous in avoiding conflicts of interest with regard to the Company's interests. A "conflict of interest" exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of the Company.

3. Hospitality/Gifts

No gift or entertainment should be offered, given, provided or accepted by any Employee, family member of an Employee or agent.

4. Anti-bribery law

Anti-bribery law prohibits a person or company from both accepting bribes as well as bribing others to gain or retain a business advantage. There is also a specific prohibition relating to the bribing of government officials. Most anti-bribery laws are quite broad and are designed to prohibit any type of inducement intended to circumvent their terms. A bribe of a government official can be broadly defined as:



NEELANSH ELECTROTECH SYSTEM PVT. LIMITED

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- A payment, offer, or promise of;
- Anything of value;
- For the purpose of:
 - Influencing an official act or decision of that person;
 - Inducing such person to do or omit to any act, in violation of his/her lawful duty;
 - Inducing such person to use his/her influence with a government/private company to affect or influence any government act; or
 - Securing any improper purpose;
- In each case, to assist in obtaining or retaining business for or with, or directing any contract or business to, any person.

It is important to note that "anything of value" extends beyond cash and can include, for example, commissions, discounts, waivers, promotions, gifts, payment or reimbursement of travel or entertainment.

Sometimes, officials may request improper payment, gifts or other incentives to perform their duties in connection with or in furtherance of these communications. Employees are prohibited from making or providing any such improper payments to government officials.

Facilitation payments are small payments made to government officials in accordance with publicly known or widely-followed local custom to expedite or secure performance of non discretionary, routine government action.

5. Contracts

Only persons at management level (management being, for these purposes and throughout this Code, only the chief executive officer) may enter into contracts with third parties on the Company's behalf. Never make an agreement on behalf of the Company with a third party verbally. All contracts must be referred to the Anti-Bribery Officer for approval prior to signature and copies of all signed contracts must be sent to the Anti-Bribery Officer within 7 days of signature.

6. Corporate Opportunity

Employees are prohibited from taking for themselves personally opportunities that properly belong to the Company.

7. Confidentiality



Employees must maintain the confidentiality of confidential information entrusted to them by the Company or its suppliers or customers, except when disclosure is authorized by or required by applicable laws, regulations or legal proceedings.

8. Fair Dealing

Each Employee should endeavour to deal fairly with the Company's customers, suppliers, competitors, officers and employees and with all the various regulatory authorities with which the Company deals.

9. Protection and Proper Use of the Company's assets.

All Employees should protect the Company's assets and ensure their efficient use.

10. Financial Reporting

The Company's policy is to comply with all applicable financial reporting and accounting regulations applicable to the Company.

11. Tax Evasion

The Company pays all relevant taxes in the jurisdictions in which it operates. All Employees should ensure that the Company complies with its taxation obligations. In addition, it is strictly prohibited for any Employee to assist or facilitate a third party to commit tax evasion. Assisting others to evade taxes is a criminal offence in many jurisdictions and could give rise to criminal liability for both the Employee and the Company.

12. Reporting Any Illegal or Unethical Behaviour

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed illegal or unethical behaviour and, when in doubt, about the best course of action in a particular situation. Employees aware of illegal or unethical behaviour should report this behaviour to superiors. Furthermore, it is the responsibility of all Employees to report any actual or presumed misconduct or violations of the ethics standards.

13. No Retaliation

The Company will not permit retaliation of any kind by or on behalf of the Company and its Employees against good faith reports or complaints of apparent violations of this Code or other illegal or unethical conduct.

14. Harassment

The Company does not tolerate any form of harassment or bullying in the workplace.

15. Health, Safety, Environment and Social Performance



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The Company's commitment to sustainable development requires us to balance our short and long term interests and to integrate economic, health, safety, security, environmental and social considerations into business decisions.

3.3.1 Conclusion and Approval

This Code will be reviewed on a two yearly basis or earlier if any significant changes occur, and notification of revisions on this document will be communicated to users. A copy of this document will be available in the office and on its website www.neelanshelectrotech.co.in
This Code supersedes any previous Business Code of Conduct, Ethics and Anti-Bribery policies.