

# **GLOBUS POWER GENERATION LIMITED**

## **(Formerly known as Globus Constructors & Developers Limited)**

### **CODE OF CONDUCT AND ETHICS FOR BOARD OF DIRECTORS AND SENIOR MANAGEMENT**

#### **1. Vision & Applicability**

Code of Conduct of the company is in alignment with its own set values and commitments. This code is designed to provide each Board Member and every Senior Management employee with guidelines for appropriate professional conduct. It is not a statement of new beliefs or some form of codification of new rules of conduct, but it is a reaffirmation of enduring values and practices being followed ever since Company was brought alive.

The central premise of this code is Globus Power Generation Limited reputation in the Industry and providing quality management and design services which are an essential prerequisite for success in our Construction business. Our clients believe in our visions and products. If we are not committed to them on the above mentioned aspects or even if they, for any valid reason, believe that we are not then Globus Power Generation Limited cannot prosper. With this the Company is in the process of preparing necessary business plans & strategies for initiating its operations in the field of Power Generation, on a large scale basis in the near future. The Company expects all officers to maintain highest professional integrity, honesty and ethical conduct, both in their personal lives and while on Company's business.

The clear implication of these beliefs is that the responsibility for safeguarding and growing a company that lives up to this code lies within each and every one of us. Every employee of ours holds a position of trust. Acceptance of a position at any level or in any part of Company includes acceptance of individual responsibility to uphold Globus Power Generation Limited policies governing legal and ethical business practices. It also includes acceptance of individual responsibility for following all legal requirements and ethical business practices, as well as the responsibility to stress proper ethical behavior among colleagues and subordinates.

#### **2. National Interest**

Globus Power Generation Limited is committed in all its actions to the benefit of the economic developmental work making INDIA a developed nation. The company shall not undertake any project or activity to the detriment of national interest. The Company shall respect and abide by all applicable laws & regulations. It shall comply with the economic policies, objectives and priorities of our developing nation and shall strive to make a positive contribution not just in national but at regional levels too.

#### **3. Shareholders**

The Globus Power Generation Limited shall be committed to enhancing shareholders wealth & value. The Board of Directors of Company commits itself to abide by all regulations and laws that govern shareholders rights. Further the Board members also commits in keeping its family of shareholders thoroughly informed about all relevant aspects of the company's business, and discloses such information in accordance with relevant regulations and agreements.

#### **4. Equal opportunities employer**

The Company shall provide equal opportunities to all its employees and all qualified applicants for employment without discriminating with regard to their race, caste, sex, religion, etc.

Our Human resource policies always promote equality in the workplace promoting equal opportunities to all its employees. Among our goals are to make benefits and services available to our employees with regard to their wellbeing, to communicate effectively with them, to ensure equal employment treatment, to assist employees in realizing their potential and maximizing their productivity, and to fairly evaluate and recognize performance.

Further our all human resource policies be administered in a manner consistent with applicable laws and other provisions of this Code, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity will be provided to those eligible and decisions shall be based on mutual discussions.

For its part, the company expects employees to perform excellent work in a cost effective manner, and to strive for quality and productivity. Also we expect from our employee that they follow all directions and instructions, properly care for facilities and equipment, to anticipate problems and suggest improvements, to treat other employees and clients and customers with honesty and courtesy, and to be energetic in the performance of tasks and fulfillment of goals.

#### **5. Safety, Health and Environment**

The company attaches a great importance to a healthy environment and to the safety of its employees.

#### **6. Ethical Conduct**

Every employee of the company including the Board Members shall deal on behalf of the company professionalism, honesty & integrity, while conforming to high moral and ethical standards. Such conduct shall be fair, reasonable & transparent and be perceived to be so by third parties.

Every employee of the Company shall preserve the human rights of every individual and the community, and shall strive to honour commitments.

Every employee shall be responsible for the implementation of and compliance with the Code in his/her environment. Failure to adhere of the code could attract severe consequences, including termination of employment.

#### **7. Transparency & Accountability**

All Company employees ensure that their actions in the conduct of business and employment are totally transparent except where the need of business security demands otherwise. All

employees shall voluntarily ensure that their areas of operation are always open to audit and the conduct of their activities are totally auditable.

### **8. Conflict of Interest**

The Board Members and the employees of the Company shall avoid any conflict, or the appearance of a conflict, between his/her personal interests and the interests of the Company.

The Board Members and employees shall disclose all the circumstances that constitute an actual or apparent conflict of interest. These disclosures shall be made to the Board of Directors or the Audit Committee, as the case may be.

### **9. Entertainment, Gifts & Donations**

The Globus Power Generation Limited and neither of its employees shall receive or offer, directly or indirectly, any gifts, donations, remuneration, hospitality, illegal payments and other comparable benefits which are intended to obtain business in favour or influence any business decision for the conduct of business.

### **10. Financial Reporting and Records**

**Globus Power Generation Limited** shall prepare and maintain its accounts fairly and accurately and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, applicable laws. Internal accounting and audit procedures shall reflect, fairly and accurately, all of the company's business transactions and disposition of assets, and shall have internal controls to provide assurance to the company's board and shareholders that the transactions are accurate and legitimate.

There shall be no willful omissions of any company transactions from the books and records, no hidden bank accounts and funds.

### **11. Political Non Alignment**

**Globus Power Generation Limited** shall not support, directly or indirectly, any specific political party or candidate for political office. The Company shall not offer or give any Company's fund or property as donations, directly or indirectly, to any specific political party, candidate or campaign.

### **12. Confidentiality**

Any information concerning the Company's business, its clients, etc., which is not in public domain and to which the Board and/or the employees have access or possess such information, must be considered confidential and held in confidence, unless authorized to be disclosed by the appropriate Authority in the company. As and when it be disclosed it is required as a matter of law or required in the ordinary course of business of the company.

### **13. Insider Trading**

The Company has formulated a Code of Conduct to prevent Insider Trading. The Board Members and Designated Employees shall comply with the requirements of the Code. The Board members and the employees shall not derive benefit or assist others in deriving benefit by giving investment advice, from the access to and possession of information which is not in public domain, about the Company and/or its clients companies, and therefore constituting insider trading.

#### **14. Compliance with Applicable Laws, Rules and Regulations**

The Board Members and Designated Employees of the Company have a duty to comply with all the laws, rules and regulations that apply to the Company's business. They must acquire appropriate knowledge of the legal requirements relating to their duties, either from internal source or from an outside source. Violations of applicable laws, rules and regulations may subject them to individual criminal or civil liabilities, as well as disciplinary action/s by the Company.

#### **15. Reporting Concerns**

Every employee of company shall promptly report to the management, they become aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanor or act not in the company's interest. It is the ethical responsibility of the employees to abide by and enforce this Code. The Board of Directors shall take necessary disciplinary action against any Director and/or employees who would be found guilty of violating this Code.

#### **16. Where to Seek Clarification**

The Board Members and Designated Employees can get clarification regarding this Code of Conduct from the Compliance Officer of the Company.

#### **Acknowledgment:**

I have received the Company's Code of Conduct for the Board and Designated Employees. I have read and understood the Code and agree to be governed by it at all times.

**Signature**  
**Name**  
**Designation**

**Dated:**