

## **SIGMA ELECTRIC MANUFACTURING CORPORATION PVT LTD. CONFLICT OF INTEREST POLICY**

### **PURPOSE:**

The purpose of this policy is to create awareness and understanding among all employees in order to prevent employees from engaging in any activities which may create a conflict of interest, or might appear to conflict with the employee's responsibilities and obligations at SIGMA ELECTRIC MANUFACTURING CORPORATION PVT LTD ("SIGMA" and / or "Company").

### **SCOPE:**

This policy applies to all employees of SIGMA including Probationers & Trainees in the Staff & Associates category.

### **POLICY:**

- Employees must never allow themselves to be placed in a position where their personal interests are in conflict (or could be in conflict) with the interests or business of the Company.
- Employees must avoid any situation or activity that compromises, or may compromise, their judgment or ability to act in the best interest of the Company.
- Employees must be conscientious and scrupulous in their handling of funds and property belonging to the Company, and must always avoid any form of financial impropriety.
- Employees must not use, or permit the use of, Company property or resources for anything other than approved Company business or activities.
- During the course of their employment at SIGMA, employees are prohibited from, in any manner, working for or providing consultation to SIGMA's competitors or engaging in any activity that competes with SIGMA's business interests. Should any employee wish to undertake any such work, prior written approval of SIGMA must be obtained.
- Employees must not indulge in any activity (at work or home) that may hurt or may have the potential to hurt the Company's reputation or good name. It shall be the duty of every employee to provide prior intimation to SIGMA in the event the employee has or is likely to have a material financial interest in the business of any other company especially a competitor of SIGMA.
- No employee shall take, offer, give or receive bribes / kickbacks or other gratification / benefit (whether monetary or otherwise) from or to SIGMA's contractors, subcontractors, consultants vendors, suppliers, competitors, or customers with a view to gain a business / personal advantage. Similarly, employees are prohibited from indulging in such acts with third parties including any government servants.
- To the extent possible, employees shall avoid conducting SIGMA's business with family members or personal friends. Employees are prohibited from taking any action that benefits an employee's family member(s), personal

friend(s) and / or conflicts with the employees' duties / responsibilities at SIGMA.

- Employees shall not indulge in any conduct / activity that may be or may even be construed to be a dereliction of duty or misuse of the corporate opportunities available to Employees by their association with SIGMA.

**Disclosure of Potential Conflicts:**

Employees must promptly disclose to the Company material information regarding any relationship, ownership or business interest, whether direct or indirect, that the employee or a member of his/her immediate family has with any person, or in any business or enterprise, that:

- Competes with the Company; or
- Purchases or sells, or seeks to purchase or sell, goods or services to or from the Company.
- Provides services to the Company in any form.

Upon disclosure of the information described above, the Company will take appropriate steps to protect itself against any actual or potential conflict of interest. Such steps may include, but not be limited to, the following:

- Requiring the employee to refrain from being involved in any decisions made by the Company regarding its dealings with such person, business or enterprise; or
- Requiring the employee to refrain from being involved in any dealings on behalf of the Company with such person, business or enterprise; or
- Requiring the employee to dispose of his/her interest in such business or enterprise if he/she wishes to remain in the Company's employment.

Violation of this policy, in letter or in spirit, will lead to disciplinary action as provided by the relevant law. SIGMA reserves the right to modify or amend this policy at any time as it may deem necessary.

Should you have any questions in relation to this policy, please contact the company Compliance Officer or Head, Human Resources at your location.

**CIPv.2**  
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