

<b>Document Title</b>	<b>Code of Conduct</b>
<b>Document Number</b>	<b>P17</b>
<b>Approval Authority / Date</b>	<b>Board of Director</b>
<b>Applicable from</b>	<b>01/04/2015</b>

### **Code of Conduct of Insecticides (India) Limited**

#### **1. Introduction**

This code of conduct summarizes Insecticides (India) Limited (hereinafter referred to as “IIL”) policies and sets up a strong Corporate Governance framework. This framework builds trust among the stakeholders of IIL, ensuring that the Company's business is carried out with steadfast integrity, adherence to ethical standards, sustainability, and a dedication to long-term success.

This code of conduct lays down responsibilities and expectations required to be followed in accordance with the principles and objectives set out in this code and in compliance with the Regulation 17(5) of the Securities and exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### **2. Applicability**

"The Code of Conduct (“the code”) applies to

- a) the Members of the Board of Directors (hereinafter referred to as "Board Members")
- b) the Members of the Senior Management Team of the Company, which includes individuals one level below the Executive/Whole-time Directors. This category encompasses Business Heads, Unit Heads, Presidents, Vice Presidents, and all other executives holding equivalent rank within the Company. Additionally, the CFO & Company Secretary of the Company and Senior Managers (hereinafter referred as “Officers”)
- c) the employees of the company appointed directly on payroll (hereinafter referred as “employees”)
- d) the contractual employees and workers engaged by the company through third-party payroll (knowingly referred as indirect employees and workers)
- e) the suppliers, vendors, consultants and other persons, corporations, trusts and firms dealing with the company whether directly or indirectly (hereinafter referred to as “Business partners”)



The code embodies our commitment to carry out business activities with ethical standards and integrity. By being part of IIL, you are agreeing to uphold this commitment.

### 3. Objective

All stakeholders engaging with IIL are obligated to adhere strictly to this code. Failure to comply will be deemed as misconduct, subject to disciplinary measures, potentially including termination of employment for officers/employees/workers, termination of agreements with business partners, and imposition of statutory penalties as mandated by the relevant laws.

No part of the code can be waived without prior approval of Nomination, Remuneration and Ethics Committee, which will obtain approvals and make sure all appropriate reports and representations are made. This includes those required by law. Waivers will only be granted in exceptional circumstances.

### 4. Our responsibilities, working conditions and environment

- a) Equal Opportunities Employer: The Company and its officers shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, nationality, disability, and veteran status. Employees of the Company shall be treated with dignity and in accordance with the Company's policy to maintain a working environment free of sexual harassment, whether physical, verbal or psychological. For more details, please refer to our [guidelines for non-discrimination](#).

Employee policies and practices shall be administered in a manner that ensures that in all matters equal opportunity is provided to those eligible and the decisions are merit-based. IIL seeks to enhance equal opportunities for both men and women and prevent/stop/redress sexual harassment at the workplace and institute good employment practices.

**Sexual harassment** includes unwelcome sexually determined behavior such as: unwelcome physical contact; a demand or request for sexual favours; sexually coloured remarks; showing pornography and any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

IIL maintains an open door for reportees and encourages employees to report any harassment concerns and is responsive to employee's complaint about harassment or other unwelcome and offensive conduct to POSH Committee. For more details, please refer to our policy framed in this regard, [https://www.insecticidesindia.com/wp-content/uploads/2023/01/POSH\\_Policy\\_2023.pdf](https://www.insecticidesindia.com/wp-content/uploads/2023/01/POSH_Policy_2023.pdf)

- b) Foster relationships built on trust, commitment, and responsibility: Every officer, dealing with each other, shall uphold the values which are at the core of our philosophy - to touch people's hearts and minds, work better together and transform the quality of life. These values form the basis of our code and processes. In areas such as selection and recruitment, meritocracy will be the only criterion and all managers will scrupulously avoid considerations other than merit and suitability. Performance management systems including appraisals, remuneration and rewards will focus on meritocracy, equity and upholding of the Company's values.
- c) Reporting and Records: The Company and its officers shall prepare and maintain accounts of the Company's business affairs fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the Company conducts its business affairs.

Internal accounting and audit procedures shall fairly and accurately reflect all of the Company's business transactions and disposition of assets. All required information shall be accessible to the Company auditors and other authorized parties and government agencies. There shall be no willful omissions of any of the Company's transactions from the books and records, no advance income recognition, and no hidden bank accounts and funds.

Any willful material misrepresentation of and /or misinformation on the financial accounts and reports shall be regarded as a violation of this code, apart from inviting appropriate civil or criminal action under the relevant laws.

- d) Transparency and Auditability: The officers shall ensure that their actions in the conduct of business are totally transparent except where the needs of business security dictate otherwise. Such transparency shall be brought about through appropriate policies, systems and processes including as appropriate segregation of duties, tiered approval mechanism and involvement of more than one manager in key decisions and maintaining supporting records. It shall be necessary to voluntarily ensure that areas of operation are open to audit and the conduct of activities is totally auditable.
- e) Shareholders: The officers of the Company shall be committed to enhance shareholder value and comply with all regulations and laws that govern shareholders' rights. The Board of Directors of the Company shall duly and fairly inform its shareholders about all relevant aspects of the Company's business, and disclose such information in accordance with the respective regulations and agreements.

Every officer shall be responsible for the implementation of and compliance with this code in his/her professional environment. Failure to adhere to the code could attract the most severe consequences, including termination of employment or directorship, as the case may be.

- f) **Gifts and Donations:** The Company and its officers shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favors for the conduct of its business. However, the Company and its employees may accept and offer nominal gifts, which are customarily given and are of a commemorative nature, for special events provided the same shall be disclosed appropriately to the management. For more details, please refer to our [guidelines for bribery prevention](#).
- g) **Company Facilities:** No officer shall misuse the Company's facilities. In the use of company facilities, care shall be exercised to ensure that costs are reasonable and there is no wastage.
- h) **Government Agencies:** The Company and its officers shall not offer or give any company funds or property as donation to any government agency or their representative, directly or through intermediaries, in order to obtain any favorable performance of official duty.
- i) **Health, Safety and Environment:** The Company and its officers shall strive to provide a safe and healthy working environment and comply the conduct of the business affairs of the Company, with all regulations regarding the preservation of the environment of the territory in which it operates. The Company and its officers shall be committed to prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment.
- j) **Ethical Conduct:** The officers of the Company, including whole time Directors, Executive and Non-executive Directors, Managing Director, CEO, CFO and CCO shall deal on behalf of the Company with professionalism, honesty and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

## **5. Operational safety, quality of products and services**

- a) **Always operate safely and securely:** We must be vigilant, disciplined, and always looking out for one another. Each of us is a role model for safety.

*What to do and what not to do?*

- *Only qualified and experienced person should carry out the work*
- *While working with different set of equipments, necessary guidelines should be followed*
- *Protect the environment*

- *One should undertake work when fit, “for example, a person having high fever, or under the influence of alcohol/drugs shall not be allowed to work*
  - *Encourage business partners and others with whom we work with to comply with applicable Health, Safety, Security and Environment requirements*
  - *Report any injury, accident, illness or unsafe working conditions immediately*
  - *Understand the emergency procedures*
- b) **Quality:** The Company and its officers shall be committed to supply goods and services of the highest quality standards, backed by efficient services consistent with the requirements of the customers to ensure their total satisfaction. The quality standards of the Company’s goods and services should at least meet the required national standards and the Company should endeavor to achieve international standards.

## **6. Corporate citizenship**

The Company and its officers shall be committed to be a good corporate citizen, not only in compliance with all relevant laws and regulations, but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates, with the objective of making them self-reliant.

Such social responsibility would comprise, to initiate and support community initiatives in the field of health and family welfare, water management, vocational training, education, literacy and encourage application of modern scientific and managerial techniques and expertise. This will be reviewed periodically in consonance with national and regional priorities.

The Company would also not treat these activities as optional ones but would strive to incorporate them as integral part of its business plan. The Company would also encourage volunteering amongst its employees and help them to work in the communities. The Company is encouraged to develop social accounting systems and to carry out social audit of their operations.

## **7. Cooperation of Group Companies**

The Company and its officers shall cooperate with other Group Companies by sharing physical, human and management resources as long as this does not adversely affect its business interests and shareholder value.

In the procurement of products and services, the Company shall give preference to another Group Company as long as it can provide those on competitive terms relative to third parties.

## **8. Public representation of the Company and the Group**

The Company and its officers shall honour the information requirements of the public and the stakeholders of the Company. In all its public appearance with respect to disclosing company and business information of the public constituencies such as the media, the financial community, employees and shareholders of the Company or the Group shall be represented only by specifically authorized directors and employees. It will be the sole responsibility of these authorized representatives to disclose information on the Company or the group.

## 9. Our business partners

- a) Safety, Quality, and Environment: We anticipate that our business partners prioritize the safety of their employees, adhere to state regulatory norms, and demonstrate the highest regard for ethical business practices.
- b) No gift policy: We do not accept or provide gifts or entertainment in return for any business, services or confidential information or if the intent is to bias a decision. For more details, please refer to our [guidelines for bribery prevention](#).
- c) A conflict of interest may occur when business partners' interests or activities may affect their ability to make objective decisions for IIL. In such scenarios, they should disclose relevant information according to the regulation 23: [Disclosure / Reporting and grievance redressal mechanism](#) of this code.
- d) Representation: Business partners which have business dealings with the IIL, such as consultants, agents, sales representatives, distributors, contractors, suppliers, etc. shall not be authorized to represent the Company if their business conduct and ethics are known to be inconsistent with this code or generally accepted code of conduct to do business.

## 10. Use of the Company brand

The use of the Company name and trademark owned by the Company shall be governed by manuals, codes and agreements to be issued by the Company. The use of the Company brand is defined in and regulated by the Company Brand Equity & Business Promotion Agreement.

## 11. Legal compliances

The officers of the Company shall comply with all applicable government laws, rules and regulations. The employees and directors shall acquire appropriate knowledge of the legal requirements relating to their duties sufficient to enable themselves to recognize potential dangers. Violations of applicable government laws, rules and regulations may subject them to individual criminal or civil liability, as well as to disciplinary action by the Company. Such individual violations may also subject to the Company to civil or criminal liability or the loss of business.

## **12. Concurrent employment**

The officers of the Company shall not, without the prior approval of the Managing Director, CFO, Company Secretary/CCO or CEO of the Company, accept employment or a position of responsibility (such as a consultant or a director) with any other Company, nor provide 'freelance' services to anyone. In the case of the Managing Director, CFO, CEO, Company Secretary/CCO, such prior approval must be obtained for providing such services from the Board of Directors of the Company.

## **13. Corporate opportunities**

The officers of the Company shall not exploit for their own personal gain, opportunities that are discovered through the use of Company's property, information or position, unless the opportunity is disclosed fully in writing to the Company's Board of Directors and the Board declines to pursue such opportunity.

## **14. Confidentiality**

The officers of the Company shall not disclose/ reveal any facts/figures/information/trade secrets or confidential documents in written/verbal form, obtained during the course of business relationship with Company to any person(s)/authority(ies)/organization(s)/statutory body(ies) unless required by law and/or with specific written permission of the Company.

## **15. Representation**

The officers shall not write/appear or represent himself/herself to any third party unless authorized by the Company in writing.

## **16. Intellectual property rights**

All documents, processes, manuals, literature, systems etc. or any other intellectual property developed or created by the officers during the association with the Company are the sole intellectual property under the Intellectual Property Rights of the Company.

## **17. Conflict of Interest**

The officers of the Company shall not engage in any business relationship or activity, which might detrimentally conflict with the interest of the Company or the group. A conflict of interest, actual or potential, may arise where, directly or indirectly:



- a) An officer of the Company engages in a business relationship or activity with anyone who is party to a transaction with his or her Company.
- b) An officer in a position to derive a personal benefit to any of his or her relatives by making or influencing decisions relating to any transaction.
- c) An independent judgment of the Company's group best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest would include the following:

- Financial interest of an officer of the Company or his/her relatives, including the holding of an investment in the subscribed share capital of any company or a share in any firm which is an actual or potential competitor, supplier, customer, distributor, joint venture or other alliance partner of the Company. (The ownership of up to 1 per cent of the subscribed share capital of a publicly held company shall not ordinarily constitute a financial interest for this purpose.)
- An officer of the Company conducting business on behalf of the Company, or being in a position to influence a decision with regard to the Company's business with a supplier or customer of which his or her relative is a principal, officer or representative, resulting in a benefit to him/her or his/her relative.
- Award or benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of any officer of the Company, where such an individual is in a position to influence the decision with regard to such benefits.
- Acceptance of gifts, donations, hospitality and/or entertainment beyond the customary level from existing or potential suppliers, customers or other third parties which have business dealing with the Company.

Notwithstanding that such or other instances of conflict of interest exist due to any historical reasons, adequate and full disclosure by the interested employees should be made to the Company's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, which would include parents, spouse and children, may have in a company or firm which is a supplier, customer, distributor of or has other business dealings with the Company.

Every officer who is required to make a disclosure as mentioned above shall do so, in writing, to his or her immediate superior, who shall forward the information along with comments to the person designated for his/her purpose by the MD/CEO, who in turn will place it before the MD/CEO and/or the board of directors/ executive committee appointed by the board and, upon a decision being taken in



the matter, the employee concerned will be required to take necessary action as advised to resolve/avoid the conflict.

If an officer fails to make a disclosure as required herein, and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management shall take a serious view of the matter and consider suitable disciplinary action against the employee.

## **18. Securities transactions and confidential information**

The officers of the Company and his or her immediate family members shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the Company or the group, which is not in the public domain and thus constitutes insider information.

The officers of the Company shall not use or proliferate information which is not available to the investing public and which therefore constitutes insider information for making or giving advice on investment decisions on the securities of the respective Company on which such insider information has been obtained.

Such insider information might include the following:

- Periodical financial results of the Company;
- Acquisition and divestiture of businesses or business units;
- Financial information such as profits, earnings and dividends;
- Announcement of new product introductions or developments;
- Assets revaluations;
- Investment decisions/ plans;
- Restructuring plans;
- Major supply and delivery agreements;
- Raising finances
- Issue of new securities and buy back of its own shares;
- Expansion/new projects;
- Amalgamation, merger or takeover.

## **19. Protecting company assets**

The assets of the Company should not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, resources as well as intangible assets such as proprietary information, relationship with customers and suppliers, etc.

## **20. Integrity of data furnished**

Every officer of the Company shall ensure, at all times, the integrity of data or information furnished by him or her to the Company.

## 21. Reporting concern

Every officer of the Company shall promptly report to the management any actual or possible violation of this code, or an event he or she becomes aware of that could affect the business or reputation of the Company or any other group company according to the Regulation 23: [Disclosure / Reporting and grievance redressal mechanism](#) of this code.

The Nomination, Remuneration and Ethics Committee has formed an **Ethics Task Force** having following Members:

- (a) Managing Director
- (b) Chief Financial Officer
- (c) Company Secretary
- (d) Executive Director

The Ethics Task Force is committed for implementation of this code and resolve grievances, concerns of the Stakeholders

## 22. Waivers

Any waiver of any provision of this Code for a director, officer or employee must be placed for approval before the Company's Board of Directors or Nomination, Remuneration and Ethics Committee, as appropriate.

## 23. Disclosure / Reporting and grievance redressal mechanism

ILL have established the three-level mechanism to process and investigate the matters falls under non-compliance of General Reporting under non-compliance of any part of this code of conduct or Bribery Prevention or Non-Discrimination or Protection of Human rights or confidentiality or Whistle blowing etc. to means a genuine concern concerning actual or suspected fraud or non-compliance.

All officers, employees, workers, business partners or other stakeholders are encouraged to report the activities mentioned below:

- a) Stealing and adopting fraudulent practices, such as improperly tampering or knowingly omitting the information or deliberately passing wrong entries or directing the employees to do the wrongful act or tempering the books and records of the Company property;
- b) Involve in corruption, including bribery and money laundering;
- c) Breaches of the Code

## **Reporting matters to the Contact:**

### **A. Reporting – 1**

#### **Head of the Department / Vice President**

- a) by email to [info@insecticidesindia.com](mailto:info@insecticidesindia.com);  
or
- b) by letter addressed to the 401-402, Lusa Tower, Azadpur Commercial Complex, Delhi – 110033. **Marked “Private and Confidential”**

Concerns have been reported, yet they have not been adequately addressed or resolved by level-1, or they pertain to matters of grave urgency.

### **B. Escalation – 1**

#### **Ethics Task Force**

- a) by email to [ethics@insecticidesindia.com](mailto:ethics@insecticidesindia.com);  
or
- b) by letter addressed to the Legal Head / Chief Compliance Officer 401-402, Lusa Tower, Azadpur Commercial Complex, Delhi – 110033. **Marked “Private and Confidential”**

### **C. Escalation – 2**

#### **Nomination, Remuneration and Ethics Committee / Audit Committee**

- c) by email to [iilsecretarial@gmail.com](mailto:iilsecretarial@gmail.com);  
or
- d) by letter addressed to the “**Chairman of the Committee**” 401-402, Lusa Tower, Azadpur Commercial Complex, Delhi – 110033. **Marked “Private and Confidential”**

*# Note*



We treat the identity of the whistleblower and the fact that a complaint has been made as confidential and shall not share with anyone in the organization except with the Audit Committee Chairman who will be the Independent Director.

For more details refer "[Vigil Mechanism and Whistle Blower Policy](#)"

## 24. Duties of Independent Directors

The Code for Independent Director ('Code') is a guide to professional conduct of Independent Directors. This is in addition to whatever has been stated above in this code and applies specifically for Independent Directors of the Company

The Guidelines for Professional Conduct, the Role, Functions and Duties of Independent Directors are provided in separate document called "Term And Conditions of The Appointment of Independent Directors and Code of Conduct" viz [www.insecticidesindia.com/wp-content/uploads/2022/04/TnCID.pdf](http://www.insecticidesindia.com/wp-content/uploads/2022/04/TnCID.pdf) and in accordance with Schedule IV of the Companies Act, 2013 and would stand amended to the extent of on any amendment to the said schedule from time to time.

## 25. Annual Compliance Reporting

Every Director and Member of Senior Management of the Company will be required to certify compliance with the Code within 15 days of the close of the financial year of the Company. Such certification shall be in the form provided in the Annexure to this Code.

## 26. Non-Adherence

Any instance of non – adherence to the Code/ any other observed unethical behavior on the part of those covered under this Code should be brought to the attention of the immediate reporting authority according to the regulation 24: [Duties of Independent Directors](#) of this code.

## 27. General revision and amendments

The Board reserves the right to amend or modify this code in whole or part, in accordance with any regulatory amendment or notification or otherwise, at any time without assigning any reason whatsoever. Any changes or modification on the code as recommended by the Committee would be presented for approval of the Board of Directors.

### List of Approval and Amendments

Approval and Amended By	Meeting date
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<i>Board of Directors</i>	2015
<i>Board of Directors</i>	30/05/2023

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## Schedule -1

### Section A - Guidelines

"Ethical Business Practices Guidelines of Insecticides (India) Limited consists of following:

- 1) **Guidelines for Bribery Prevention**
- 2) **Guideline for Non-Discrimination**
- 3) **Guidelines for protection of Human Rights**
- 4) **Guidelines for Confidentiality**

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### **Guidelines for Bribery Prevention**

#### 1. Introduction and Purpose

At IIL, we are committed to conducting business with honesty, integrity, and transparency. These Bribery Prevention guidelines outlines our commitment to preventing bribery and corruption in all our operations and relationships.

Our goal is to:

- (a) Comply with all applicable anti-bribery and corruption laws and regulations.
- (b) Provide instructions to our employees, directors, workers, suppliers, and other business partners on recognizing and addressing situations that may not comply with the policy.
- (c) Overall, the purpose of this policy is to ensure clarity, consistency, and compliance in our operations, fostering an environment of accountability and fairness for all stakeholders involved.

#### 2. Definitions

- (1) **Bribery:** The act of offering, giving, receiving, or soliciting something of value to influence the actions of an individual in a position of trust or authority, often for an improper advantage or to gain a business advantage.
- (2) **Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery, abuse of power, or favouritism, leading to improper personal gain or advantage.
- (3) **Kickback:** Illicit payments, favors, or benefits provided to an individual or entity in exchange for preferential treatment, such as the awarding of contracts or other business advantages.
- (4) **Improper Gifts, Entertainment, or Hospitality:** Providing or receiving lavish gifts, extravagant entertainment, or excessive hospitality with the intention of influencing business decisions or actions improperly.

- (5) Whistleblower: An individual who reports or exposes misconduct, illegal activities, or unethical Behavior within an organization, often seeking to bring such actions to the attention of authorities or the public.
- (6) Non-Compliance: Failure to adhere to or act in accordance with the company's policies, procedures, or legal requirements, potentially leading to violations of laws or ethical standards.

3. What does it mean for you?

- (1) Recognising bribery or corruption: As personnel under the scope of this policy, you may encounter certain situations which could be considered as bribe/kickbacks under Anti-Corruption and Anti Bribery laws. Illustrations of such situations are as follows: -
  - (a) Am I being asked to provide a monetary benefit to a third party other than cost of services provided by them?
  - (b) Am I being requested a cash payment from a third party/government official to sign a formal contract?
  - (c) Are the gifts provided to me both in cash or kind by a third party are justified?
- (2) Gifts , Kickbacks and Hospitality
  - (a) No personnel under the scope of this policy would either accept or offer gifts or entertainment of any kind in order to bias a business decision or secure some type advantage for the organisation or self.
  - (b) Accepting or providing any kind of bribe or kickbacks is prohibited under this policy.
- (3) Charitable and Political Contributions
  - (a) IIL make charitable contributions that are legal and ethical to support local charities and causes under the purview of its Corporate Social Responsibility (CSR) activities after the approval of CSR committee.
  - (b) As per the provisions of Companies Act 2013, any type of contribution done to any political organisation or public official to attain improper advantage is strictly prohibited.

4. Reporting

Board Members, officers, employees and Board Members are encouraged to report any suspected or actual violations of this regulation and guidelines according to the regulation 24 code of conduct.

5. Responsibilities and Training



- (1) Management Responsibility: Senior management is responsible for promoting and enforcing this policy throughout the organization. They must lead by example and provide necessary resources to ensure compliance.
- (2) Employee Training: Regular training sessions will be conducted to educate employees on anti-bribery and corruption laws, policies, and procedures.

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## **Guideline for Non-Discrimination**

### 1. Introduction and Purpose

At IIL, is committed to provide a fair and inclusive workplace where all employees are treated with dignity, respect, and have equal opportunities for employment, career development, and advancement. No employee or applicant will be discriminated based on race, caste, religion, color, ancestry, marital status, sex, age and nationality or any other status or characteristic which is personal. IIL's commitment to equal opportunity is integral to their culture, guiding their actions, decisions, and interactions throughout every level of the organization. Guidelines for non-Discrimination outlines the commitment to promote diversity and prohibiting discrimination within the organization.

### 2. Objectives

- (1) **Equal Opportunity:** Individuals and groups within IIL work in an environment where all decisions are free of discrimination, where they have equal opportunity based on relevant abilities, skills and merit. Employees are encouraged to take positive action towards promoting equal opportunity throughout the organization. Their recruitment and selection processes are designed to be fair and unbiased, ensuring equal opportunities for all candidates.
- (2) **Fair Compensation:** Personnel actions such as compensation, benefits, transfers, layoffs, company-sponsored training programs and social and recreational programs will be administered on a non-discriminatory basis.
- (3) **No discrimination:** IIL's full time/ part time employees, job applicants, interns and workers do not suffer unfair discrimination in the workplace. No discrimination shall be tolerated based race, caste, religion, color, ancestry, marital status, sex, age and nationality or any other status or characteristic which is personal.
- (4) **Recruitment and Training:** IIL is dedicated to recruit, hire, and promote individuals based on their qualifications, skills, and experience relevant to the job requirements. IIL provides training, professional development, and advancement opportunities to all employees based on merit, performance, and potential and is committed to create a supportive environment that encourages career growth for everyone within the organization.
- (5) **Work Environment:** IIL strives to maintain a work environment that is free from harassment, intimidation, and hostility. All employees are expected to treat each other with respect and professionalism, fostering a culture of inclusivity and collaboration.

### 3. Grievance Redressal Mechanism



Board Members, officers, employees and Board Members are encouraged to report any suspected or actual violations of this regulation and guidelines according to the regulation 24 code of conduct.

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## **Guidelines for Protection of Human Right**

### 1. Introduction and Purpose

The Company appreciates that the human rights are inherent, universal, indivisible, and interdependent in nature and thus to ensure employees' basic human rights are protected and Company has laid down guidelines on human rights.

### 2. Objectives

These guidelines are prepared to in keeping with the Constitution of India, Laws, Policies and the International Bill of Human Rights, IIL will observe and ensure that basic human rights of each employee are respected, valued and protected and all policies, practices, procedures and rules of the Company will be accordingly formed.

- (a) The Company and all its employees will live the chosen values of integrity, recognition, openness, ownership, collaboration and creativity.
- (b) All hiring decisions and benefit policies will ensure impartiality with the inherent ethos that all employees are equal irrespective of gender, caste, religion, region, etc.
- (c) Penal actions against employees will follow the principles of natural justice and all such actions will be in accordance with relevant laws laid down.
- (d) The Company will ensure that each employee is made aware of their basic rights and redressal mechanisms.
- (e) The Company will continuously review practices, policies, programs to ensure that human rights of each of its employee remain protected and grievances in this respect are promptly addressed.
- (f) The Company will recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- (g) The Company will, within its sphere of influence, promote the awareness and realization of human rights across its value chain.
- (h) The Company will not knowingly complicit with human rights abuses by a third party.
- (i) IIL is dedicated to combating child labor, forced labor, including bonded labor, slavery, and human trafficking.
- (j) IIL acknowledges and supports employees' lawful right to freedom of association.



- (k) No discrimination shall be tolerated based race, caste, religion, color, ancestry, marital status, sex, age and nationality or any other status or characteristic which is personal.
- (l) IIL endeavors to guarantee gender-neutral pay for equal work among employees and takes corrective action if disparities are identified.
- (m) IIL aims to establish and integrate health and safety protocols, with a particular emphasis on women's safety, support for individuals with disabilities, emergency response, and preventive health measures.

### 3. Reporting

Board Members, officers, employees and Board Members are encouraged to report any suspected or actual violations of this regulation according to the regulation 24 code of conduct.

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## **Guidelines for Confidentiality or Privacy**

### 1. Introduction and Purpose

III is committed to protection of the data of its employees, suppliers and customers. This document outlines how we collect, use, disclose, and manage your personal information. We are committed to protecting your privacy and ensuring the secure handling of sensitive information.

This section applies in relation to the Personal Information or Sensitive Personal Data or Information (collectively referred to as "Information") of all individuals that users may share with us during the access or use of our website or application.

This Privacy Policy, forming part of the Terms of Use (collectively referred to as the "Agreement"), dictates how we access, collect, use, handle, and store the information you provide, or we access on our website ("Site") and mobile software ("Application"). Please carefully read this Policy, as it outlines your choices for information use, and how you can access and update it. By using or accessing the Site, Application, or any features therein, you agree to and are bound by the terms outlined in this Policy.

### 2. Information We Collect

We may collect the following types of personal and business-related information:

- Contact information (name, job title, company name, address, email address, phone number)
- Business identification information (tax identification number, company registration details)
- Transactional information (purchases, orders, invoices)
- Technical information (specifications, formulations, usage data)
- Safety and compliance data (Material Safety Data Sheets - MSDS)
- Health and safety-related information for employees and contractors
- Other information voluntarily provided by you.

### 3. How We Collect Information

We collect information through various means, including:

- Directly from you or your authorized representatives during business interactions
- Automatically through our websites, online platforms, and communication systems
- From publicly available sources
- Through contractual agreements with third-party vendors and business partners

### 4. How We Use Your Information

We use your information for the following purposes:

- Fulfilling orders and providing products and services
- Managing customer accounts and relationships
- Ensuring compliance with safety and regulatory requirements
- Improving our products and services
- Communicating with you about our products, services, and updates

#### 5. Modification of Intent

We will refrain from using your personal information and Sensitive Personal Data or Information (SPDI) for purposes other than the initially collected intent. However, if we determine a need to use it for an additional purpose compatible with the original one, we will notify you before doing so.

#### 6. Disclosure of Information

We may share your information with:

- Third-party service providers, business partners, and contractors involved in our operations.
- Regulatory bodies and authorities to comply with legal obligations.
- In the context of mergers, acquisitions, or other business transactions (with appropriate confidentiality measures)

#### 7. Data Security

Given the sensitive nature of the information we implement stringent security measures, including:

- Secure data storage and transmission
- Access controls and authentication mechanisms
- Regular security assessments and audits.

#### 8. Retention of Information

We retain your information for the duration necessary to achieve the purposes outlined in this policy unless a longer retention period is required or permitted by law.

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**Schedule 2**

**Section B (Annexures)**

**Annexure 1**

To,  
The Company Secretary  
Insecticides (India) Limited  
401-402, Lusa Tower,  
Azadpur Commercial Complex,  
Delhi – 110033

Sub: Annual Compliance Report under Regulation 26(3) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

I, ----- S/o Sh. -----, do hereby solemnly affirm that to the best of my knowledge and belief, I have fully complied with the provisions of the Code of Conduct during the financial year ended March 31, \_\_\_\_\_.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Address: \_\_\_\_\_

Date: \_\_\_\_\_

Place: \_\_\_\_\_

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