

BUSINESS ETHICS AND INTEGRITY POLICY

OVERVIEW

MITCON Consultancy & Engineering Services Limited's (MITCON) purpose for this ethics policy is to establish a culture of openness, trust and integrity in business practices. We care as much about how results are achieved as we care about the results themselves. Effective ethics is a team effort involving the participation and support of every employee.

MITCON is committed to protecting employees, partners, suppliers and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. Because MITCON addresses issues proactively and uses correct judgment, it helps set us apart from competitors.

MITCON will not tolerate any wrongdoing or impropriety at any time. MITCON will take the appropriate measures to act quickly in correcting the issue if the ethical code is broken. Any infringements of this code of ethics will not be tolerated.

PURPOSE

The purpose of this policy is to emphasize the employee's and customer's expectation to be treated to fair business practices. This policy will serve to guide business behaviour to ensure ethical conduct and business integrity.

SCOPE

This policy applies to employees, contractors, consultants, Board of Directors, Management, permanent employees contractual staff of MITCON, including all personnel working with third parties.

OUR POLICY

Our business ethics & integrity policy calls for the following commitments:

EXECUTIVE COMMITMENT TO ETHICS

- Senior management within MITCON must set a prime example to all they come into contact with. In any business practice, honesty and integrity must be the top priority for executives.
- Executives shall have an 'open door' policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the work force.
- Executives must disclose any conflict of interests with regard to their position within MITCON.

EMPLOYEE COMMITMENT TO ETHICS

- MITCON employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- Every employee needs to apply effort and intelligence in maintaining ethics value.
- Employees must disclose any conflict of interests regarding their positions within MITCON.
- Employees will help MITCON to increase customer and supplier satisfaction by providing quality product and services with a timely response to inquiries.

COMPANY AWARENESS

- Promotion of ethical conduct within interpersonal communications of employees will be rewarded.
- MITCON will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

MAINTAINING ETHICAL PRACTICES

- MITCON will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs to consistently maintain an ethical stance and support ethical behaviour.
- Employees at MITCON should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.

MITCON Consultancy & Engineering Services Limited (IS/ISO 9001:2015)

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PREVENTING UNETHICAL BEHAVIOUR

- MITCON will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- MITCON will not tolerate harassment or discrimination.
- Unauthorized use of company trade intelligence & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.
- MITCON will not permit impropriety at any time and we will act ethically and responsibly in accordance with all local laws.
- MITCON employees will not use corporate assets or business relationships for personal use or gain.

ENFORCEMENT

- Any infringements of this code of ethics will not be tolerated and MITCON will act quickly in correcting the issue if the ethical code is broken.
- Any employee found to have violated this policy may be subject to disciplinary action, up to and including, reduction of salary or position and termination of employment.

DISCLOSURE:

This policy shall be disclosed on the Company's website at www.mitconindia.com. Web link thereto shall be provided in the prescribed reports under Companies Act, 2013 or SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

AMENDMENTS AND UPDATES:

The Board shall have the power, subject to applicable laws, to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. The Company Secretary being the Compliance Officer is also authorized to make amendment in this policy, where there are any statutory changes necessitating the amendment in the policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.

Sd/-
Mr. Anand Chalwade
Managing Director

Policy Adopted on 13th February, 2023