

CODE
OF
CONDUCT

Foreword

The Code of Conduct outlined here intends to be a guideline to you on the values you are expected to live by as a member of the Trufrost family. While it does not cover every possible issue, it puts together the principles that we strongly believe in.

I urge each employee to not only read the Trufrost Code of Conduct but also imbibe it and take pride in upholding the high standards of corporate and personal behaviour on which the company's reputation is founded.

Neeraj Seth

Our Values

Quality

We proactively bring world class products & solutions to our customers and facilitate in their being able raise the bar in their own businesses.

Customer Satisfaction

We are relentless about delivering a pleasant experience to our customers and we know that our success comes only with their success. We enable them to focus on and execute their highest business priorities.

Profitable Growth

We consider profitable growth as the back-bone of our organization since it allows us to remain committed to our other values.

Respect for people

We believe that our employees, sales and service partners, vendors, customers and each stakeholder with whom we work are our true partners and we remain sensitive to treating them with utmost respect.

Respect for environment

We genuinely care for the environment and that reflects in our focus on sustainable products, eco-friendly materials and components, durability and energy efficiency.

The Code

1. Legal Compliance

All employees must respect the laws of the locations that we operate in.

Trufrost does not subscribe to any business practice, which violates any law or legal provision. We also pledge to respect the local customs and traditions in all our geographies, as long as following them does not cause any legal violation.

2. Accounting and Financial Reporting

Trufrost shall ensure complete fairness and accuracy in the preparation of its accounts. All employees involved in the process need to follow the generally accepted principles, standards and laws for the same. Authorized parties including internal/external auditors and government agencies will have access to the information as needed.

3. Conflicts of Interest

Trufrost forbids any willful misrepresentation or misinformation, and any employee found involved in it will invite civil or criminal action, based on the relevant laws. Trufrost does not permit any employee to engage in dual employment or any activities that conflict with the legal, business or moral interests of the company. Some potential conflict of interest situations could be:

- a) Engaging in a business or relationship with a person who is party to a transaction with Trufrost.
- b) Deriving improper benefit for self or any relatives/friends by influencing the decisions pertaining to any business transaction
- c) Seeking dual employment: However, the following situations are exempt from this clause:
 - Appointment to the board of a joint venture or an associate company
 - Positions of responsibility in non-profit organizations or educational ventures
 - Exceptional situations, as determined by the Managing Director

Conflicts of interest are not always clear-cut. Consult your supervisor or any other senior person, if you become aware of such a situation so that the conflict can be avoided or resolved. In case an employee fails to disclose a conflict of interest, and the management comes to know of it, a serious view of the matter will be taken, resulting in suitable disciplinary action.

4. Competition and fair play

Like any other business, we definitely aim to outperform our competitors. But, our values dictate that we must only use legal and fair means to do so. We do not condone misusing proprietary information belonging to any customer, vendor, or even competitors to gain an unfair advantage. We strongly discourage employees from making misleading statements about competitors' products or policies.

5. Corporate governance

Trufrost encourages its employees to contribute to the community by volunteering and being part of help groups. We will attempt to do whatever we can to improve the quality of life in communities around us.

6. Discrimination and Harassment

The diversity of our staff is a matter of pride for us. We are committed to providing equal opportunities to our workforce, and do not tolerate any kind of discrimination or harassment, based on gender, religion, caste, age, sexual orientation, or region. In case you are subjected to any form of discrimination, please get in touch with or write to any director.

7. Public relations and media

Only authorized personnel are allowed to provide information about Trufrost to the media or the outside public. The basic purpose is to ensure that only relevant and verified information is released into the public domain. If you are approached by anyone in this respect, please direct them to the concerned director.

8. Trademark usage

The Trufrost brand name and all related trademarks are the exclusive property of the Company. No individual or party shall use these without authorization, and any illegal use of any of these will be liable to prosecution.

9. Health and Safety

Trufrost aims to provide every employee with a safe and healthy environment. You must help us in this endeavour by following the necessary safety protocols and workplace rules.

- Ensure that you report all instances of injuries, accidents, or unsafe equipment immediately.
- Do not come to work under the influence of alcohol or illegal drugs.
- Do not smoke inside the office.
- Carrying firearms to work is prohibited.
- Ensure that fire safety rules are followed and ensure that all electrical malfunctions are promptly reported and fixed.

10. Confidentiality

Employees must maintain the sanctity of all confidential information and M.I.S. that they handle during the course of their job. Any non-public information that may be of use to competitors or harmful to us or our customers shall be considered confidential. The obligation to preserve this information remains even after an employee's term of service is over. Unauthorized distribution of this information would be a violation of the company policy and could attract civil and criminal penalties.

11. Company Asset Protection

All employees must attempt to use company assets efficiently and ensure their safekeeping. Any suspected incidents of fraud or theft must be reported immediately. Resources belonging to Trufrost must not be used for non-company business. The obligation to protect assets includes both physical assets as well as confidential information that may be in the custody of any employee.

12. Reporting violations

Any employee who comes to know of a violation of the code being committed is obligated to report it immediately to his/her supervisor. In case, due action is not taken by the supervisor, the issue may be brought to the notice of the Managing Director.

Trufrost forbids any retaliatory action against individuals who have made complaints of Code violations whether proven or unproven.

The Trufrost Code of Conduct is not an exhaustive document that covers each and every possibility which may arise. Employees have a continuing obligation to keep themselves acquainted with current industry practices, organizational rules, local customs and applicable laws. In case of non- clarity, please approach your supervisor for guidance.

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