

LOTTE INDIA CORPORATION LIMITED

CODE OF CONDUCT & ETHICS

- Code of Conduct and Ethics for all Employees & Directors
- Areas of Code of Conduct and Ethics
- Compliance with Government Laws, Rules and Regulations
- Violations of the Code
- Waiver and Amendments of the Code

Code of Conduct and Ethics for all Employees & Directors

Objectives:

- To identify, promote and sustain a set of business practices for orderly and fair conduct of company business.
- To comply with all applicable laws, rules and regulations, policies and procedures adopted by the Company from time to time.

Applicability:

- Board of Directors & its Committees (BoD)
- All employees
- As the principles enumerated are general in nature, the employees are requested to follow the Standard Operating Procedures presently in place.

Areas of Code of Conduct and Ethics

A. Honesty and Ethical Conduct

- BoD and all employees are expected to act in accordance to the highest standards of personal and professional integrity, honesty and integrity at the workplace, at sponsored business and social events of any other place representing the Company.
- Honest conduct to be followed that is free from fraud or deception
- Ethical conduct to be followed conforming to the accepted professional standards of conduct and includes ethical handling of actual or apparent conflict of interest between personal and professional relationships

B. Conflicts of Interest

- A conflict of interest comes when interests or benefits of one person or entity conflict with the interests or benefits of the company like
- All are expected to devote full and total attention to the business interests of the company.
- BoD and all employees are prohibited to engage in activities that interfere with their performance or responsibilities to the company.
- It is a conflict of interest to serve as a Director of any company that

competes with the company. Directors are expected to obtain approval from the Company Audit Committee before accepting the same.

- As a general rule, BoD and all employees shall avoid conducting company business with any blood relative or even associate in a business in which a relative is associated in a significant way in the Company.
- BoD and all employees are expected to discourage employment of relatives in the Company.
- BoD and all employees may not exploit opportunities for their personal gains, opportunities that are discovered through the use of corporate property, information or position unless the opportunity is cleared in writing by the company's Board of Directors.

Disclosure to Stock Exchange and Public

- BoD and all employees shall ensure to provide full, fair, timely and understandable disclosure of reports and documents as and when necessitated.
- All communications to the Government and other statutory authorities to be cleared with Chairman / Managing Director.

Compliance with Government Laws , Rules and Regulations

- BoD and all employees shall ensure compliance with all the governmental laws, rules and regulations.
- BoD and all employees to recognise potential dangers and seek advice from the Legal Department to steer clear of any civil and criminal liability.

Violations of the Code

- BoD and all employees shall alert to possible violation by reporting to the HumanResources and Legal Departments.
- BoD and all employees must co-operate in any internal or external investigations of possible violation.
- Reprisal, threat, retribution or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this code or company policies or against any person who is assisting in the investigating process is prohibited.

Waiver and Amendments of the Code

- This code is subject to amendment and modification
- This shall be in writing by the company's Board of Directors.
 - It has to be disclosed on the company's website.
