



SANGHVI MOVERS LIMITED

CONFLICT OF INTEREST POLICY

DATE OF APPROVAL:

10 FEBRUARY 2023



CONFLICT OF INTEREST POLICY

Purpose

This policy is designed to provide guidance to conduct business with utmost professionalism, integrity, honesty, moral and ethical standards. The Conflict of Interest policy is intended to ensure that all associates avoid obligations to or relationships with any person or business with whom Sanghvi Movers Limited (SML) competes or does business. Such obligations or relationships could affect judgment in fulfilling their responsibilities to SML and give rise to a conflict of interest.

The policy guides us to avoid any conflict or appearance of a conflict between our personal interests and our Company's interests. It lays the principles for undertaking business transactions with undivided loyalty and without any personal conflict. Our employees shall always act in the best interests of the company. They should ensure that any business or personal association which they may have does not create a conflict of interest with their roles and duties in the company or its operations.

Applicability

This policy applies to all on roll employees of SML, Board Members, Contractors, Consultants, Trainees, Apprentices of our Company, affiliates and persons or entities contractually obligated across the globe.

Definitions

Business associate: It includes customers, suppliers, vendors, or other such persons with whom SML has any business or transactional dealings.

Competent authority: In case of all employees, the competent authority would be designated superior not below the Head of the department.

Conflict of Interest: A conflict of interest could be any known transactions, relationships or services engaged by an employee, his/her immediate family/relatives, which may cause concern (based upon an objective determination) that the employee could not or might not be able to fairly perform his/her duties to the company.

Immediate family members/relatives: It includes mother, father, son, daughter, brother, sister, son in law, daughter in law, brother in law and sister in law or immediate family members of spouse like mother in law, father in law, brother in law and sister in law.

Conflict of interest includes situations:

Where an employee's private affairs or financial interests are in conflict with his/her work duties, responsibilities and obligations or results in a perception that a conflict exists. That could impair the employee's ability to act in the Company's interest. Where the actions of an employee would compromise or undermine the trust of stakeholders.

A conflict of interest, actual or potential, arises where, directly or indirectly an employee:

1. proposes to engage in a personal business transaction or a personal relationship with the business associates of our Company;
2. is offered/derives undue benefit, personally or for any Immediate family member, by making or influencing decisions relating to any transaction;



3. is in a position to influence a decision with regard to the company's business with a business associate where an immediate family member/relative is a proprietor/ director / partner or representative;
4. is in a position to influence decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of an immediate family member/relative employed in the company.

Employees must be fair and transparent in all of their dealings on behalf of the Company and not accept personal gifts or hospitality from those doing business or seeking to do business with the Company. Employees are required to consult with their HoDs or Head HR whenever they have any question/dilemma as to whether a particular circumstance may place them in a conflict of interest situation.

Employees who fail to comply with these standards during their employment will be subject to appropriate disciplinary action. If stricter norms are prescribed under any applicable law with respect to conflict of interest, then, employees shall comply with such stricter norms.

Breach of Policy

Any breach of the Policy including failure to report potential violations of compliance principles or applicable laws may result in disciplinary measures up to and including termination, suspension of employment or penalty.

The Policy is part of the SML's Sustainability Framework. This policy is approved by SML's Board of Directors.

Review

This Policy may be amended by the Board from time to time to be in line with relevant amendments.

Version	Particulars	Date	Approved by
1.0	New Policy adopted	10.02.2023	Board of Directors
