



Employee's Code of Conduct

**Neco Group of Industries
Nagpur**



VISION

GLOBALLY RENOWNED

PROVIDERS FOR

• IRON & STEEL PRODUCTS • CASTINGS & CAST COMPONENTS

MISSION

SUSTAINABLE GROWTH AND RETURN ON INVESTMENT BY :

CONTINUOUS IMPROVEMENT OF

• HUMAN RESOURCE • ENVIRONMENT • TECHNOLOGY • PRODUCT

CORE VALUES

CUSTOMERS

• ESTABLISHING LONG TERM RELATIONS WITH CUSTOMERS BASED UPON MUTUAL TRUST LEADING NECO TO BE PREFERRED BRAND

PEOPLE

• COMPETENT • COMMITTED • SELF CONTROL WITH HONESTY & INTEGRITY
• WORKING WITHIN ENVIRONMENT WHERE FREE EXPRESSION
BASED UPON MUTUAL TRUST SHALL FOSTER INNOVATION.

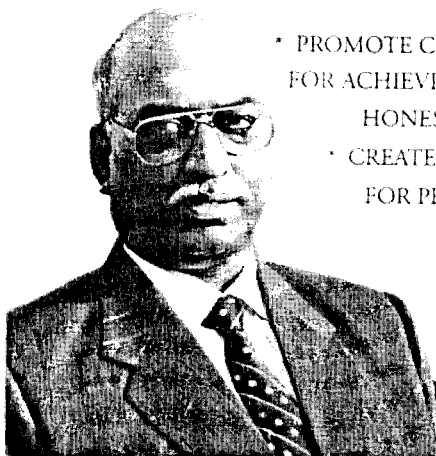
BUSINESS

MARKET DRIVEN AND PROFITABLE BUILT ON MUTUAL TRUST OF

• CUSTOMERS • SUPPLIERS • EMPLOYEES • SHARE HOLDERS

MANAGEMENT

• PROMOTE COMMITTED & DEDICATED TEAM
FOR ACHIEVING BUSINESS OBJECTIVES WITH
HONESTY AND INTEGRITY AND
• CREATE SUITABLE ENVIRONMENT
FOR PERFORMANCE BY PEOPLE



Basant Lall Shaw
Chairman

1. **E**qual -opportunities Employer

Neco Group Company (NGC) 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 and nationality. Employees of Neco Group of Industries shall be treated with dignity. Employee policies and practices shall be administered in a manner that would ensure that in all matters equal opportunity is provided to those eligible and the decisions are merit-based.

2. **H**ealth, safety and environment

Neco Group Company shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in.

3. **G**ifts and donations

Employees of Neco Group Company shall not receive directly or indirectly, any illegal payments, remunerations, gifts, donations or comparable benefits which are intended to or perceived to give business or un-competitive favours for the conduct of its business.

4. **E**thical conduct

Every employee of Neco Group Company, which shall include one and all employed shall deal on behalf of the Company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and the perceived to be as such by third parties.

Every employee shall be responsible for the implementation of and compliance with the Code of conduct in his professional



environment. Failure to adhere to the Code of conduct will be treated as misconduct and could attract the most severe consequences including termination of employment.

5. Concurrent Employment

An employee of Neco Group Company shall not, without the prior and written approval of the Jt. Managing Director / Director, accept employment even part time or a position of responsibility (such as a consultant) or engagement of any other nature with any other company, nor will provide "free-lance" services to anyone.

6. Conflict Of Interest

An employee of Neco Group Company shall not engage in any business relationship/ activity, which might detrimentally conflict with the interest of his Company or the Group directly or indirectly. A conflict of interest, actual or potential, may arise where, directly or indirectly:

(a) an employee of a Neco Group Company engages in a business, relationship or activity himself or with anyone who is part to a transaction with his Company,

(b) an employee is in a position to derive a personal benefit or a benefit to any of his relatives by making or influencing decisions relating to any transaction, and

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

(i) Financial interest of an employee of Neco Group Company or his relatives including the holding of an investment in the subscribed share capital of the 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 Neco Group of Industries. (The ownership of upto

1 % of the subscribed share capital of a publicly held company shall not ordinarily constitute a financial interest for this purpose).

- (ii) An employee conducting business on behalf of (Neco Group Company) or being in a position to influence a decision with regard to his. Company's business with a supplier or customer of which his relative is a principal, officer or representative, resulting in a benefit to him or his relative.
- (iii) Award or benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of Neco Group Company where such an individual is in a position to influence the decision with regard to such benefits.
- (iv) 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 dealings with the Company directly or indirectly.

Not with standing 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, brothers/sisters, inlaws and their spouse/sons/daughters may have in a company or firm which is a supplier, customer, distributor of or has other business dealings with his Company of Neco Group of Industries.

Every employee who is required to make a disclosure and take permission as mentioned above shall do so, in writing, to his immediate superior who shall forward the information along with his comments to the person designated for this purpose by the Joint M.D/Director who in turn will place it before the



MD/Jt.M.D. for his information and necessary directions, whether to permit continuation or give direction for rectification.

If an employee fails to make a disclosure and obtains permission 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 would take a serious view of the matter and consider suitable disciplinary action against the employee which may include termination of service.

7. Securities transactions and confidential information

An employee of Neco Group Company and his immediate family 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.

An employee of Neco Group 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 advise on investment decisions on the securities of the Company on which such insider information has been obtained.

Such inside information might include the following:

- Acquisition and divestiture of businesses or business units
- Financial information such as profits, earnings and dividends
- Announcement of new product introductions or developments
- Asset revaluations
- Investment decisions/plans
- Restructuring plans and
- Major supply and delivery agreements
- Raising finances

8. **Protecting company assets**

The Company's assets 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, relationships with customers and suppliers, etc.

9. **Citizenship**

An employee of Neco Group Company shall in his private life be free to pursue an active role in civic affairs as long as it does not adversely affect the business or interests of the Company.

10. **Integrity of data furnished**

Every employee of Neco Group Company shall ensure, at all times, the integrity of data or information furnished by him to the Company.

11. **Reporting concerns**

Every employee of Neco Group Company shall promptly report to the management any actual or possible violation of the Code or an event he becomes aware of that could affect the business or reputation of his or any other Neco Group Company.



Neco Group of Industries

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