

Introduction

This Code of Conduct (hereinafter referred to as "the Code") has been framed, approved and adopted by Anukaran Commercial Enterprises Limited (hereinafter referred to as "the Company") in compliance with the provisions of Clause 49 of the Listing Agreements entered into by the Company with Bombay Stock Exchange.

Consistent with its values and beliefs, the Company has formulated the following Code of Conduct as a guide. The Code does not attempt to be comprehensive or cover all possible situations. It encourages the team to take positive actions, which not only commensurates with the values and beliefs, but also perceive to be so.

Code of conduct:

- The Board Members and Senior Managers shall observe the highest standards of ethical conduct and integrity and shall work to the best of their ability and judgment.
- Act honestly, diligently and in good faith and integrity in all their dealings with and for the Company.
- Not engage in any business, relationship or activity, which might detrimentally conflict with the interest of the Company.
- Abide by all applicable laws and regulations including the Company's Prevention of Insider Trading code.
- Not use their status to seek or accept any personal gains or favors from those doing or seeking to do business with the Company or from other employees of the company.
- Shall maintain and help the Company in maintaining highest degree of Corporate Governance practices.
- Shall not commit any offences involving morale turpitude or any act contrary to law or opposed to the public policy.
- Shall ensure compliance of the prescribed safety & environment related norms and other applicable codes, laws, rules, regulations and statutes, which if not complied with may, otherwise, disqualify him/ her from his/ her association with the Company.
- Shall maintain the highest standards of personal integrity, truthfulness, honesty and fortitude in the discharge of their duties in order to inspire stakeholders confidence.
- Shall maintain confidentiality of information entrusted by the Company or acquired during performance of their duties and shall not use it for personal gain or advantage.

- Shall in conformity with applicable legal provisions disclose personal and/ or financial interest in any business dealings concerning the Company and shall declare information about their relatives (spouse, dependent children and dependent parents) including transactions, if any, entered into with them.
- Shall not communicate with any member of press or publicity media or any other outside agency on matters concerning the Company, except through the designated spokespersons or authorized otherwise.
- Shall ensure compliance with SEBI (Prohibition of Insider Trading) Regulations, 1992 as also other regulations as may become applicable to them from time to time.

Review of the Code

The Code shall be reviewed as and when deemed fit by the Board and necessary amendments may be made thereto. Any such amendment shall be notified to all members of the Senior Management by the Compliance Officer.

Any breach of the aforesaid Code brought to the notice of the Compliance Officer or any member of the Board or Senior Management shall be reported to the Board of Directors of the Company for necessary action.