



# Lucid Colloids Limited

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**Registered & Corporate Office:**

401A Navbharat Estates, Zakaria Bunder Road, Sewri West, Mumbai 400015, India.

Tel: +91-22-24158059 Fax: +91-22-24158074 Email: admin@lucidgroup.com

Company Identification Number: U24311MH1996PLC099800

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## CODE OF CONDUCT FOR EMPLOYEES

### Introduction

Lucid Colloids Limited (“**Company**”) is firmly committed to legal and regulatory compliance and ethical conduct. The Company is also committed to create a workplace that is motivational and free from harassment or discrimination.

This Employees’ Code of Conduct (“**Code**”) articulates the standards that each employee must adhere to in the course of duties.

### Objectives

The objectives of this Code are to re-emphasize the Company’s commitments:

- Co-workers and others with whom you interact must be treated with respect, courtesy, honesty and fairness;
- Diversity of faith and religion must be respected;
- Any form of discrimination must be eschewed irrespective of gender or creed or colour or physical or other diversities;
- Co-operation and harmony at all levels must be fostered;
- Personnel will be rewarded for merit and diligence.

### Applicability

- This Code applies to all employees of the Company wherever located and irrespective of seniority. For the purposes of this Code “**Employee**” means all individuals employed by the Company whether full-time or part-time or seasonal and shall include apprentices, trainees and secondees;
- All contractors engaged by the Company are required to ensure that their personnel are made aware of the Code and comply therewith in all their dealings with the Company and its vendors, suppliers and customers as also their respective personnel.

### Compliance

- Employees must act in compliance with law;
- If there be any reasonable doubt Employees must seek guidance from the reporting head who will, if necessary, escalate to higher levels;
- While good order and discipline requires that instructions from superiors must be diligently followed in the unlikely event that there is a genuine doubt as to the



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propriety of instructions, matters must be timely escalated to appropriate levels and guidance sought.

### **Behavior**

- Each Employee must avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company. Accordingly, the Company expects its Employees to act in the Company's interest at all times;
- Employees must not offer, give or receive any form of inducement or bribe. Festive complimentaries and customary hospitality is permitted but neither should be excessive nor be such as to place the recipient under any obligation.

### **Confidentiality**

- Information received by Employees in the course of their employment about the Company, its clients, vendors and suppliers and competitors (actual or potential) must be maintained confidential. Such information must be used only in good faith discharge of duties and under no circumstances should be used for personal gain or for any third party's benefit. Such information may be shared within the organization on a need to know basis;
  - Please be aware that in the course of its business the Company may receive information from third parties subject to confidentiality obligations. Unauthorized access to or dissemination of such information may involve serious risks for the Company. Any infraction will be severely dealt with;
  - Personal information of Employees is confidential. Such information must be accessed and used only for proper Company requirements. If you inadvertently come across such information you must immediately report to your line superior and the head of the concerned section / department.
  - Company's communication facilities and infrastructure (including emails and internet and laptops, mobiles and other storage devices) are to used only for bona fide requirements of the Company. Personal use of the Company's communications facilities and infrastructure is prohibited except in rare emergency situations. Even in such situations pre-clearance from line superior should be obtained. If emergent circumstances do not permit pre-clearance such usage must be immediately reported to the line superior;
  - Note that the Company may monitor and record your communications;
  - In the event of any breach or apprehended breach the Company will have the right to access (including mirror) data that you may have stored and make such information available to public / enforcement authorities as considered appropriate.;
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- While the Company will ordinarily respect your privacy legal and regulatory interests and the Company's larger interests will prevail over personal privacy;
- Company's Records must be used only for the purposes of the Company's business. Records must not be shared with any third party except with prior permission of your line superior who may, wherever appropriate, obtain permission from higher authority. No Records should be copied except in the course of Company business and the number of copies must be limited as required by work exigencies;
- Under no circumstances should any Company Records be removed from Company premises except with prior authorisation and only for Company's business. The Records so removed must invariably be brought back to Company premises as soon as possible. Cloud storage or storage of Records at remote locations is not to be used except as expressly permitted by the Company.
- For the purposes of this Code "**Record(s)**" means written or electronic / machine recorded / readable data in any form or format and "**Copy**" with its cognate expressions means reproduction in any form or format.

### **Environment Health and Safety (EHS)**

- The Company is committed to EHS. Employees are required to comply with Company EHS standards and measures;
- If any Employee contracts a serious communicable disease the Employee is expected to promptly report to the line superior. If the seriousness so warrants such Employee may be required to abstain from the work place for the appropriate duration. The Company reserves the right to report the occurrence of such disease to appropriate authorities.

### **Protection and care of Company Property**

- The Company may provide for individual use the Company's equipment particularly mobiles / smart phones / laptops / tablets / phablets. All such equipment shall belong to the Company and shall remain the Company's property. Any and all Records on such equipment shall be Company Records to which the Company will have access and which the Company may copy at all times. Employees must take due care of all such equipment and immediately report any loss (including loss of data / Records) or theft;
- All Employees are responsible for protecting and taking reasonable steps to prevent the theft or misuse of or damage to any assets and property of the Company (including Records and the Company's good reputation and goodwill that the Company enjoys). Company's property must not be borrowed, loaned or dealt with or disposed of, except in accordance with appropriate Company authorisation.



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## **Honesty Integrity and Fair Dealing**

- Employees shall at all times act honestly, with integrity and fairly in all matters concerning or relating to the Company;
- Dishonesty, fraud and any criminal or unlawful activity will be dealt with severely in accordance with law and will invite disciplinary action;
- Employees must not indulge in any anti-competitive / monopolistic / cartel practices;
- Corrupt or unethical practices must be eschewed.

## **Reporting**

- Employees must ordinarily report any infraction or likely infraction of this Code to the line supervisor.
- If there is good reason to believe that the line superior is involved in such infraction matters may be reported to senior hierarchy.
- An Employee who wishes to raise concerns can do so in the full knowledge and confidence that the Company will ensure that the *bona fide* act of raising such concerns will not lead to such Employee facing any recrimination, punishment or victimization;
- Non-observance of this Policy shall be construed as misconduct that could warrant disciplinary action, including dismissal in deserving cases. The decision in this regard will lie with the Management, including the Business Unit Head and shall be binding on the Employees;
- The Company reserves the rights to change/ amend / add /delete/ modify this Policy in whole or in part, at any time without assigning any reason whatsoever. Any such amendment or modification will be effective and binding from the date that it is notified on the Company's intra-net.