



# **INDOBELL INSULATIONS LIMITED**

REGD. OFFICE: 88C, LAKE VIEW ROAD, KOLKATA - 700 029  
CORP. OFFICE: 20/1A, LAKE VIEW ROAD, KOLKATA - 700 029  
GSTIN:19AAACI8026P1Z2, CIN : L26102WB1972PLC028352

Phone: 033-35440886  
Email: [info@indobell.com](mailto:info@indobell.com)  
Website: [www.indobell.com](http://www.indobell.com)

## **INDOBELL INSULATIONS LIMITED**

### **EMPLOYEE CODE OF CONDUCT AND ETHICS POLICY**

INDOBELL INSULATIONS LIMITED

Version: 1.0

Effective Date: 15/11/2025

Approved by: Board of Directors

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**Works:**

**Eastern Region:** D-195, Trenching Ground Road, Kolkata - 700 024

**Western Region:** Plot No. 18, Gala No. 2 & 3, Dewan & Sons Industrial Estate, Vevoor, Palghar - 401 404



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## 1. Purpose and Scope

This Employee Code of Conduct and Ethics Policy (the “Code”) sets forth the standards of behavior expected from all employees of Indobell Insulations Limited (“the Company”). It applies to all employees, including full-time, part-time, contract staff, interns and temporary personnel across all offices and project sites. Compliance with this Code is mandatory.

## 2. Core Values and Principles

- Integrity and honesty in all dealings.
- Respect for colleagues, customers, suppliers and the community.
- Accountability and ownership of actions.
- Compliance with laws, regulations and Company policies.
- Commitment to safety, sustainability and environmental stewardship.
- Teamwork, cooperation and professionalism.

## 3. General Conduct Requirements

Employees must maintain the highest standards of professionalism and ethical behavior. They shall avoid conflicts of interest, protect confidential information, use Company assets responsibly and uphold all applicable laws and internal policies including those related to health, safety, anti-bribery and data protection.

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## 4. Specific Expectations

Attendance and punctuality are mandatory, and any absence must be properly justified. All employees are expected to adhere strictly to the office timing policy. In case anyone needs to leave early or step out during office hours for personal reasons, prior intimation to the HR department is compulsory. A casual approach in this regard will not be accepted going forward.

- . Use of Company assets and resources must be for authorized business purposes only.
- . Confidential and proprietary information must be protected at all times.
- . Employees must avoid conflicts of interest and disclose any potential conflicts to management.
- . Harassment, bullying or discrimination of any form is strictly prohibited.
- . Employees must comply with anti-corruption and anti-bribery regulations.
- . All financial and operational records must be accurate and transparent.
- . IT systems and communication channels must be used responsibly and securely.
- . Only authorized personnel may represent the Company in public or media communications.

## 5. Classification of Misconduct

Misconduct is categorized as either Minor or Major depending on the severity and impact.

### Examples of Minor Misconduct include:

- . Habitual lateness or absenteeism without significant disruption.
- . Minor misuse of Company property or facilities.
- . Failure to follow dress code or minor procedural errors.
- . Inadvertent breach of confidentiality without material damage.

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- Low-level non-compliance with safety procedures.

## **Examples of Major Misconduct include:**

- Fraud, theft, embezzlement or financial misreporting.
- Bribery, corruption or acceptance of unlawful inducements.
- Serious harassment, discrimination or violence.
- Willful breach of confidentiality or data protection.
- Substance abuse or safety violations leading to injury or damage.
- Gross negligence or deliberate damage to Company property.
- Criminal conduct impacting the Company's reputation.

## **6. Disciplinary Procedure**

Allegations of misconduct shall be investigated fairly and confidentially. Depending on severity, actions may include verbal or written warnings, suspension, demotion or termination.

## **7. Reporting Mechanisms and Whistle-Blowing**

Employees are encouraged to report any suspected misconduct, unethical behavior or violations through HR, line management. Reports may be made anonymously and will be protected from retaliation.

## **8. Training and Awareness**

The Company will provide training on ethical conduct, anti-corruption, safety and data protection. Employees must complete all mandatory training modules and refreshers periodically.

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## 9. Monitoring and Review

The Code will be reviewed annually or as required by regulatory or operational changes.

## 10. Consequences of Non-Compliance

Violation of this Code may result in disciplinary action up to termination of employment. Serious breaches may also attract legal or regulatory action.

## 11. Employee Acknowledgement

I acknowledge that I have received, read and understood the Indobell Insulations Limited Employee Code of Conduct and Ethics Policy. I agree to comply with its provisions and understand that violations may result in disciplinary action.

Name of the Employee:

Signature:

Date:

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## **Annex A: Gifts & Hospitality Policy**

Employees shall not offer, solicit or accept gifts or hospitality that could influence business decisions. All gifts or entertainment above INR 2,000 must be declared to the HR Department for approval.

## **Annex B: IT & Email Acceptable Use Policy**

Company IT resources are to be used responsibly for business purposes. Unauthorized access, sharing confidential data, installing unapproved software, or visiting inappropriate websites is strictly prohibited.

## **Annex C: Whistleblower & Reporting Procedure**

Employees may confidentially report violations or unethical conduct via email at [auditcommittee@indobell.com](mailto:auditcommittee@indobell.com). The Company prohibits retaliation against individuals who report concerns in good faith.

Name of the Employee:

Signature:

Date:

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