



MANTRI METALLICS PVT.LTD.

CONFLICT OF INTEREST POLICY

REF. NO.	MMPL/CSR/HR/P 04	Issue No./Date	00/30.06.2024
Page No.	1 of 2	Rev No./Date	00/30.06.2024

Purpose: –

Create guidelines related to conflict of interest and ensure companies decision making is not affected by personal interest of people of the employee. This guideline provides good and principle for preventing conflict of interest and scope of action.

Identifying and processing of conflict of interest: -

Addressing a "conflict of interest" is the process of identifying and implementing strategies and practices to minimize the risks associated with the disclosed conflict of interest One example: it an Associate's spouse is a Senior Executive at a potential The Company supplier, the Associate's Manager may decide the best way to mitigate potential risks to the business interests and reputation of the Company is to exclude the Associate from any role where he/she make decisions about or influence the outcome of that supplier's activities.

Addressing a conflict of interest is the responsibility of the Manager. The Manager shall-

- a) Treat the information disclosed by the employee with appropriate confidentiality and without bias.
- b) Fairly evaluate the conflict of interest situation disclosed by the employee, including the risks to the business interests and reputation of the Company
- c) Inform and seek guidance from Legal, HR, or the Company Secretary and address the conflict of interest so that risks to The Company are minimized and the personal interests of employee are protected as far as possible.
- d) Communicate the decision and its reasoning to the employee and follow up to ensure the employee understands and complies with it.

Conflict of interest prevention frame work: -

In case a Conflict of Interest has been reported or suspected to have been committed, the Company's Ethics Committee of the respective business comprising of the following incumbents, shall immediately investigate and implement appropriation

1. External Member working as Social worker/ with NGO
2. Managing director.
3. Head of department of concern department.
4. HR head



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Breach of policy: -

Breach of this Policy will not be tolerated and will be liable to be subjected to disciplinary action, which may extend up to dismissal from service.

Responsibility: -

It is the responsibility of every employee to adhere to this policy within his or her area of functional responsibility, to lead by example, and to provide guidance to those employees reporting to him. All employees shall be responsible for adhering to the principles and rules set out in this Guide the Human Resources function shall be responsible for ensuring conflicts of interest are disclosed by new hires during the hiring process.

Power of Amend: -

Any change of the guideline shall be approved by the Head-Group Corporate HR. The management shall have the overriding right to withdraw and/or amend the guideline at its own discretion as it deems fit from time to time. The decision of the management shall be final and binding.

Communication of this Policy: -

1. Training.
2. Notice board.
3. Company Web site.
4. Joining of new employee.
5. Company web site

Committee Members -

Sr. No.	Members Name	Designation	Mail ID
01	Mrs. Aarti Agrawal	Chair Person	aarti.agarwal3112@gmail.com
02	Mr. Prasad Mantri	MD	prasad@mantrimetallics.com
03	Mr. Milind Kulkarni	HR Consultant	mbkulkarni@mantrimetallics.in
04	Head of concern dept.	Dept. Head	-