

Revised Date: 13<sup>th</sup> Jan, 2026

## **Employee Code of Conduct**

### **ELIGIBILITY**

This Code of Conduct is applicable to all the permanent employees of JK Cement Limited and its 100% subsidiaries (JKCL of J.K.Cement) as well as outsourced roll employees, full time retainers/advisors and contract based employees, working for JKCL in any role.

### **PURPOSE**

The Board of Directors has adopted **Code of Ethics and Business Conduct** for Members of the Board of Directors and Members of the Senior Management Team/Key Managerial Personnel of the Company i.e. one level below the Executive Directors/Managing Director. The Management has formulated following Code of Conduct for other Officials, Executives and employees

This sets forth the minimum standard of conduct required of all other Officials, Executives and employees. The Code provides a broad and clear statement of the conduct expected of every employee. JKCL has a zero tolerance approach towards violation of the code of conduct.

### **JK Cement Compliance Statement:**

In all aspects of JKCL's business activities, we emphasize compliance, and, endeavour to create value based organization. If compliance requirements conflict with business profits or the demands of third parties, we give priority to compliance.

Our effort is to ensure that the corporate activities we are involved in, are always open, fair and just. Infringement of the points listed below may lead not only to legal sanctions and disciplinary actions, even in certain grave cases termination of employment.



Registered Office

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## **Code of Conduct**

Code of Conduct include the specific identified issues, besides the general guidelines as defined in other JK Cement guidelines and policies.

### **A. Behavioural Conduct:**

Employees are required to undertake their duties in a professional, responsible, conscientious and ethical manner and to act in the best interests of the organization. They are expected to act honestly in all of their duties when dealing with clients, suppliers, contractors and fellow employees. The Employees should not be under the influence of alcohol or other substances while they are at work or at work functions. Possession, use or trafficking in illegal drugs on the premises is not permitted. JK Cement operates in a no smoking environment. Smoking is allowed only in designated areas outside the building.

### **B. Conflicts of Interest**

Employees should avoid conflicts between personal and JK Cement interests. If actual or apparent conflicts are unavoidable, seek guidance on the best course of action and fully disclose of any transaction or relationship that reasonably could be expected to give rise to a conflict.

The Officials, Executives and employees should be scrupulous in avoiding 'conflicts of interest' with the Company. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the Chief People Officer or Company Secretary and Compliance Officer nominated for this purpose and a prior written approval should be obtained.

### **C. Audit and Investigations**

Employees must cooperate and comply with the requirements of any internal or external audit or investigation. There shall be no purposeful concealment of information from the Company's internal and external auditors, or the Company's lawyers/advisors whose specific enquiries should be answered to the best of the employee's knowledge.

### **D. Protection of Company' Resources and Assets**

Employees are responsible for safeguarding all Company's properties issued to them, or made accessible to them in order to carry out their duties properly including but not limited to intellectual property, physical property, proprietary information, supplier information, equipment, computer systems and software, etc. Employees have a duty to maintain the confidentiality, integrity and security of official information for which they are responsible.



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## **E. Confidentiality, Security & Intellectual property**

Every employee must observe strict confidentiality about the company's business and records. No employee of the company shall communicate directly or indirectly to any person or to the press with regard to any document or information which may come into his/ her possession in the course of his/ her duties or may have been prepared or collected by him/ her in the course of such duties.

## **F. Data Security**

Data Safety, Sanity and Maintenance is everyone's responsibility. Every employee is required to maintain the Data Integrity, Security and Confidentiality in line with the roles assigned. Every employee must ensure that no data is accessed, downloaded and shared outside one's domain, without prior permission from the Functional and Divisional Heads. This includes the following (but not limited to)

1. Access to the data available in the system (Servers, Devices, Mobile – Company related Data only).
2. Any operational or recorded data that is of significance to company undertaken by the management/supervisors/employee.
3. Any source or primary materials, in particular where these may be necessary to validate transaction/report.
4. Operational data from the Machines/Devices/Sensors in the plant.
5. Curated data from company's source data.
6. Video, Audio, Text, and Images related to the organizational interest.
7. Design Documents, Mockups, Workflows, Surveys, standards etc.
8. Any Microsoft Document (Excel, Word, PowerPoint, etc.)
9. SOPs and Governance Policies meant for the Business/Division/Function/Department/Individual.
10. Numerical or Graphical Data evolved from the transactional/reporting system
11. Trade secrets, commercial information, materials necessary to be held confidential by an employee, until they are published, or similar information that is protected under law.

Failure to comply with the Data maintenance guidelines may be considered as breach of Code of Conduct. Every employee acknowledges and agrees that monetary damages would not be a sufficient remedy for any breach of Clause F of Code of Conduct and that the Company will be entitled to specific performance and injunctive relief as remedies for any such breach. Such remedies shall not be deemed to be the exclusive remedies for a breach of this Code of conduct but shall be in addition to all other remedies available in law or in equity. Company has the complete right to get the data audited on surprise basis.



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## **G. Outside Employment**

All Staff members should devote their full attention, knowledge and skills exclusively to the business interests of the Company. Staff members are specifically prohibited from, and shall cease engaging in any outside employment or business activities which shall interfere with their ability to devote their full attention to fulfilling their obligations to JK Cement. The company reserves the rights and shall have the sole and full discretion, at any point in time, to allow such outside employment or business activities.

## **H. Community Volunteering & Political Activities**

Employees are neither permitted to use JK Cement's name in connection with any political campaigning nor use JK Cement's funds for political purposes. Any such participation and service will only be deemed acceptable if business relationship between the Company and the organizations undertaking such activities would not be prohibited or limited because of statutory or administrative requirements or a conflict of interest.

## **I. JK Cement Vendors and Business Associates**

JK Cement prohibits the usage of any company relationships for personal requirements. While dealing with any supplier, vendor, partner and or any business associate the employee cannot use any company related information and / or resource for any personal use, either permanently or temporarily. Any act of such nature will lead to a termination of services and / employment without any notice period or money in lieu of.

Employees must award orders, contracts and commitment to suppliers without favouritism/ prejudice, all other things being equal. Company business of this nature must be considered strictly on the basis of merit and avoiding any conflict of interest.

## **J. Bribes Prohibited**

Employees must not offer/ accept any bribes (monetary or non-monetary) to/ from any Company Stakeholder (Business Associates, Vendors as well as Customers). Any failure to oblige to this will result in immediate disciplinary action and could be a ground for dismissal.



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## **K. Gifts from Business Associates**

**A gift** is defined as an item or article of monetary value presented to a JK Cement employee by a non JK Cement personnel or any item or monetary value presented to a non JK Cement personnel by a JK Cement employee.

**Entertainment** (recreational activities including, but not limited to dining, beverages, lodging, transportation and travel) is an event with a specific business purpose.

Employees are expected to exercise sound judgment when dealing with business entertainment and/ or gifts. As a general policy, receiving of gifts individually from vendors or external sources is strongly discouraged. However, gifts may be accepted on festive occasions as a token of greetings after exercising due caution & wisdom.

As a general rule, no employee should accept a gift or benefit if it could be seen as intended or likely to cause that person to:

- perform their job in a particular way, which the person would not normally do, or
- Deviate from the proper or usual course of duty.

## **L. Occupational safety and health**

JK Cement is committed to providing a safe and healthy workplace for all employees and visitors. It is therefore important that employees are familiar with the standards or procedures in their particular area of work.

All employees are responsible for:

- knowing and complying with the OHS rules and guidelines
- working so as not to endanger themselves or any other person by any act or omission
- use and follow OHS instructions, training or other information

## **M. Employee Relative Employment**

A conflict of interest may arise where an employee makes or participates in decisions affecting another person with whom they have a personal relationship (such as a relative, spouse, close friend or personal associate).

In cases where a conflict may arise, employees must take written advise of their manager/HOD. Wherever possible employees should disqualify themselves from dealing with those persons in such situations.



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**N. Integrity**

Employees will strive to maintain personal Integrity and further the interest and welfare of the company. In cases where the employees are found to be guilty of not adhering to integrity or any kind of dishonesty, all such cases will be liable to be terminated with immediate effect without any notice or payment in lieu of.

**O. Delegation of Authority:**

Each employee, and particularly each of the Company's Officers, must exercise due care to ensure that any delegation of authority is reasonable and appropriate in scope, and includes appropriate and continuous monitoring.

**P. Anti-discrimination commitment:**

The Company promotes and supports a diverse workforce across all levels. We believe that Diversity and Inclusivity (D&I) at workplace is an instrument for growth and we value and celebrate the uniqueness of every individual by fostering an environment of inclusion and empowerment. The Company is dedicated to creating a fair and transparent work environment with mutual respect for all. We strive to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, promotions, development, training, and compensation at the Company is qualifications, performance, skills and experience.

**Q. Charitable contribution:**

Employees must not allow J.K Cement's present or anticipated business to be a factor in soliciting political or charitable contributions from outside parties. In addition, it is generally not appropriate to solicit JK Cement for donations to a family-run non-profit organization, family foundation, donor-advised fund or other charitable organization in which an associate or their family members are significantly involved.

**R. Transfers:**

Time to time Company transfers employees from one location to another or one role to another on account of various business necessities or employee's development to prepare them for future roles. Employees are expected to abide by the transfers, once done. If any employee creates undue external or any other influence to revoke/delay/modify transfer, this shall be considered as a breach of code of conduct and employee doing so would be liable for appropriate disciplinary action.



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**S. Recovery from Gratuity Payment:**

Any employee in occupation of Company quarters/accommodation shall hand over the possession of such quarter/accommodation to the Company simultaneous with severance of employment for any reason whatsoever. In case employee fails to hand over possession at the time of severance, Company shall be entitled to levy and recover unauthorized occupancy charges and electricity charges on per month basis from such employee at the rate Company deems fit till the handing over of Company quarters/accommodation. Employee waives its right to raise any objection on levy and recovery of such unauthorized occupancy charges and electricity charges and hereby consents to Company deducting the same from the gratuity, if any, payable to such employee. Gratuity, if payable, to the Employee shall be withheld by the Company till handing over of possession of Company quarters/accommodation by the employee and balance gratuity payment shall be made after adjusting the unauthorized occupancy charges.

**T. Social Media:**

Any employee permanent or contractual or any person associated with the organisation by virtue of any nature of association, cannot post anything on the social media which tarnishes the image of the organization or brings the organization to an ill repute. **Organization is free to take strict disciplinary action against any person who is found to be involved in any such act.**

**U. Undue Influence on the Company or other Employee:**

Any act of the employee to exert external political / social / governmental pressure and / or undue influence on the Company or any other employee of the Company for any reason shall be considered as a breach of code of conduct. Whether the employee succeeds or not in achieving his objective is immaterial. Any such act of the employee shall constitute breach of code of conduct.

**V. Improper Personal Financial Transactions:**

An employee shall not enter into any financial dealings with any business associate of the Company (like dealer/distributor/CFA/retailer/Supplier/customer) other than those that are directly attributable to business of the Company and done through usual banking channels of the Company only. Any other financial dealings shall constitute breach of code of conduct.



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#### **W. Non Disclosure of Financial Information:**

The organisation reserves the right to take strict disciplinary action in case an employee is found to be sharing or using Unpublished Price Sensitive Information inside or outside the organisation in an irresponsible manner

- Any financial results, draft financial statements, working papers or related information, until approved by the Board and formally published, constitute confidential information and may qualify as Unpublished Price Sensitive Information (UPSI).
- Such information should be shared strictly on a need-to-know basis and only through authorized official channels only.
- Circulation or storage of draft financial information on personal devices, messaging applications, emails beyond designated recipients, or social media platforms should be strictly avoided.
- Physical printouts of draft financial information should be kept to a minimum and, wherever unavoidable, handled with due care. Leaving documents unattended at printers, workstations or common areas should be avoided.
- All recipients of such information must ensure appropriate safeguards in line with the Company's Insider Trading Code and information security protocols.

#### **X. Prohibited Substance Use:**

JK Cement adopts a zero-tolerance approach towards alcohol, drugs and other prohibited substances at the workplace. Consequently, it is strictly prohibited to:

- Consume, possess, store, distribute, sell, purchase or be under the influence of alcohol, drugs or prohibited substances on Company premises during working hours.
- Report for duty or attend work in an impaired state due to prior consumption of alcohol, drugs, or any intoxicant.
- Consume alcohol or drugs while driving a company owned vehicle.
- Use, consume or possess prohibited substances while operating Company machinery, equipment, motor vehicles or while performing any safety-critical roles.
- Meet any business partner/ associate / Client or customer in an intoxicated state

#### **Y. Disclaimer:**

While this policy has been made as informative as possible and structured to ensure quick and easy interpretation by all employees, you are encouraged to reach out to HR Department / concerned HR representative if you must seek clarity on any aspect related to this policy. As and when there's an amendment to this policy, the updated policy document will be shared by the HR department through the appropriate channel of communication.

In case of any ambiguity related to understanding of this policy, the final interpretation by the respective HR and the Group President – People, Culture & Digital will be considered as applicable.

For JK Cement Ltd.,



**Dr. Andleeb Jain**  
**Group President – People, Culture & Digital**



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