

CODE OF CONDUCT AND ETHICS

Scope & Applicability:

The Code of Conduct and Ethics (hereinafter referred to as the “Code” or the “Policy”) upon enforcement shall apply to the Board of Directors, including Whole-time Directors and Independent Directors, Employees, Workers, Value Chain Partners, Vendors and Other Stakeholders (collectively referred to as “we” or “us”) who work with DOMS Industries Limited and our subsidiary companies (referred to as “DOMS Industries”, “DOMS”, the “organisation” or the “Company”). The Code is in addition to and in some cases a repetition and revision of policies that are already in practice within the organisation.

The Code shall be effective as of August 12, 2024, and shall be in force until modified, replaced or terminated.

In addition to this policy, the Board of Directors (including Independent Directors) and Senior Management Personnel shall also comply to a specific policy named ‘[Code of Conduct for Directors and Senior Management](#)’ which has been hosted on the website of the Company.

Purpose of the Code:

The Code defines the expectations of the Company from our people, all those who work with us and all our stakeholders. The Code outlines the expected ethical standards of conduct, behaviour and processes that will enable this to be maintained.

It also acts as a reference for everyone involved on what to do, how to do and importantly what not to do.

The Code has been instated to meet the following objectives:

1. To provide stakeholders of the Company guidance on ethical conduct while dealing with the organisation or on behalf of the organisation. The Code must be used with judgement, based on specifics of the situation, but should be followed in a spirit of good conduct and disclosure at all times;
2. To enumerate and uphold values critical to the conduct and success of the organisation;
3. To create a culture that builds, enhances and preserves value for the organisation, its stakeholders and the society over the long-term.

It shall be the responsibility of all those covered in this Code to:

- Comply with the Code and related policies and guidelines at all times.
- Set an example on good conduct at the work place based on mutual respect and fairness.
- Seek clarifications and assistance when in doubt.
- Participate in advocacy and training programs on the Code as and when necessary.
- Promptly report known/suspected violations.
- Co-operate in investigations when there is an allegation on breach of conduct.

The Code acts as a guiding principle but cannot envisage every situation or action; neither can it cover every regulation and law that is applicable to individuals at a given time. Moreover, in the modern connected and digital world, new issues emerge and it is up to every individual to exercise their judgment before taking action on a matter. When in doubt, please seek advice to protect your individual reputation, integrity and that of the Company.

For more guidance on the Code, kindly reach out to Company Secretary and Compliance officer at cs@domsindia.com or Chief Financial Officer at rahul@domsindia.com of the Company.

Registered Office:

J-19, Opp. Telephone Exchange,
G.I.D.C., Umbergaon- 396171,
Dist. Valsad, Gujarat, India.

Website:

www.domsindia.com

Corporate Office:

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Hiranandani Link Road, Vikhroli (W)
Mumbai- 400079, Maharashtra, India.

Tel: (+91) 7069028500 / 600

Email: asst.admin@domsindia.com

Dear Stakeholders,

At DOMS Industries, **Ethics and Fair Business Conduct** are pillars of our Company's culture, the framework for every decision we make, and ultimately, the foundation of the trust we build with all our stakeholders.

In today's world, trust is paramount. Customers and Consumers want to know they're buying from a company that operates with integrity. Investors want to see sustainable long-term growth driven by ethical practices. Employees thrive in a work environment where they know everyone is playing by the same rules and Communities deserve to have businesses that contribute positively to their well-being.

And hence, we must unequivocally be committed to ethical business conduct. This means:

- **Integrity:** We must act with fairness and honesty in all our dealings.
- **Transparency:** We must have fair and open communication channels and make honest disclosures.
- **Accountability:** We must take responsibility for our actions and hold ourselves to the highest standards.
- **Compliance:** We must adhere to all applicable laws and regulations.
- **Respect:** We must treat everyone with dignity and respect, regardless of position, background, or belief.

This document outlines specific ethical guidelines and expectations for all stakeholders that work with us. It shall serve as a practical guide to ethical decision-making and help us navigate complex situations with clarity and integrity.

At Doms, ethics isn't just about having a written policy; it's about creating a culture where ethical behaviour is ingrained in everything we do. We can achieve this through:

- **Leadership by Example:** We must actively demonstrate ethical behaviour, thereby setting the tone for others in organisation to follow.
- **Open Communication:** We must encourage a culture of open communication where stakeholders may communicate constructive feedback or raise concerns without fear of retaliation.
- **Continuous Improvement:** Building a strong ethical foundation is an ongoing process. We must continuously evaluate and improve our policies and practices as needed.
- **Recognition and Rewards:** We must recognize and reward persons who exemplify good conduct in their performance.

I would urge all our stakeholders to embrace this Code in full spirit and justice. Our commitment to do the right things in the right manner shall ultimately help us secure our future success. By building trust, we can attract and retain talented employees, empower innovation, build strong customer relationships, and gain the respect of communities. Ultimately, commitment to ethics ensures that our success is sustainable and that we leave a positive legacy for generations to come.

Warm Regards,

Santosh Raveshia
Managing Director
DOMS Industries Limited

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Company Values

The Company considers the following as its core values:

Honesty & Integrity

We should:

- Act with fairness to all, in a manner that is unbiased and professional.
- Strive to be truthful and transparent in all our communications and actions.
- Not to discriminate anyone based on their caste, creed, gender, colour, or position.
- Provide accurate and complete information in all business dealings, both internally and externally.
- Disclose any potential conflicts of interest and avoid situations that could create a perception of impropriety.
- Make judicious use of company resources, including time, property, and technology.
- Adhere to all applicable laws, regulations, and Company policies.
- Be transparent in our dealings and avoid red tape or bureaucracy.
- Prioritise organisational interests over personal interests and not undertake any inappropriate decision for personal gain.

Fidelity & Accountability

We should:

- Take full responsibility of our work.
- Exercise due care and diligence when we delegate work and remember that we are ultimately responsible for it.
- Bear in mind our fiduciary duty to our employer, stakeholders and the society at large.
- Strive to deliver what we commit to, upholding high standards of quality and diligence.
- Follow company policies and protocols and maintain adequate records, wherever needed.
- Demonstrate ownership of our work and take pride in improving our work output and efficiency.

Trust & Respect

We should:

- Build trust with all stakeholders, including our customers.
- Promote highest standards of quality and excellence at work.
- Encourage inclusivity in our decision-making and promote a culture of innovation.
- Treat everyone with courtesy, dignity and respect, regardless of position, background, or beliefs.
- Respectfully give and take feedback, and provide a fair chance to be heard.

Anti-Corruption

At DOMS Industries, we strive to hold high standards to integrity and discourage corruption of all forms. **Corruption**, as defined under United Nations Convention against Corruption, means “the offence of illicit enrichment, bribery, embezzlement, abuse of power, or any other act or omission constituting a misuse of public or private power for personal gain or to benefit a third party, or both, directly or indirectly, in violation of the provisions of national law.”

A **bribe** is construed as “anything of value and includes, but is not limited to cash, cash equivalents, gifts, inside information, sexual or other favours, lavish corporate hospitality or entertainment, offering employment to a relative, charitable donation or social contribution, political contributions, abuse of function and can pass directly or through a third party.”

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A **kickback** is typically “a payment made to an employee, person or commercial organisation, in return for a business favour or advantage, such as a payment made to secure the award of a contract.”

Facilitation payments are “small unofficial or customary payments made to expedite or secure a routine action from a government/public official.” These may be prevalent or considered normal in many countries or industries.

A **government/public official** is defined as “an employee and/or official, whether elected or appointed, who holds any governmental position, including legislative, administrative, or judicial position of any kind; is a candidate for any governmental position; any official or employee of a company wholly or partially controlled by a government (such as state-owned companies); or an official in a political party, in a country or territory.”

Prohibition of Corruption:

The Code prohibits use of corruption in any form, including providing, accepting, or soliciting bribe, kickbacks or facilitation payments from competitors, vendors, suppliers, customers, or others that do business or are trying to do business with DOMS Industries. We must ensure that the same is followed by our affiliates, partners or relatives where they undertake or make arrangements relating to the transaction on our behalf for the Company. All transactions must be undertaken at arm’s length and should not impair our bias and judgement. Further, we must abide by the provisions of Prevention of Corruption Act,1988 (India), or equivalent Acts in case of international business at all times.

Gifts & Hospitality:

While it may be considered customary to give or receive gifts or hospitality (including entertainment or travel) of nominal value on certain occasions, we must ensure that:

- a. It is not made to obtain or retain business, influence a business decision or seek a favour in business;
- b. It is lawful under the laws of the country and under the policy of the Company to accept or give such gift or hospitality;
- c. It is not in the form of cash, unless it is towards reimbursement of expenses incurred and normally borne by the counterparty in the course of business;
- d. It shall not exceed the value of ₹ 5,000 (Rupees Five Thousand only) or equivalent currency, whether individually or in aggregate during the year, given that a higher amount may be allowed in writing by the Compliance officer if considered customary and in compliance with other principles of this Code;
- e. Any gifts offered to or received from government entities, government officials or representatives, or politicians or political parties must be expressly disclosed in writing to the Compliance Department.

Contributions and Investments:

As part of its corporate citizenship activities, DOMS may support local charities or provide sponsorship. We only make charitable donations that are legal and ethical under local laws and practices and also within the corporate governance framework of the organization.

We should be mindful that charitable contributions might be, in some circumstances, used to disguise bribery or corruption. We must be diligent to ensure that Charitable Contributions are not misused as a Bribe. To mitigate the risk of perceived bribery or corruption, all Charitable Contributions on behalf of the Company must be made through the Corporate Social Responsibility Policy or as permitted in writing by the Compliance Officer.

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The Company may sponsor sporting or cultural events. Bribery and corruption may be disguised as sponsorships in certain circumstances. We must be diligent to ensure that sponsorship payments do not constitute a bribe.

Employees may provide Charitable contributions in their personal capacity. However, these personal contributions should not be to the detriment of the Company and its reputation. It must not be made as representatives of the Company or reimbursed by the Company.

Suspicious Activities:

The following matters must be brought to the attention of the Compliance Officer or the Chief Financial Officer immediately when:

- a. We become aware that a counterparty engages in, or has been accused of engaging in, improper business practices;
- b. We learn that a counterparty has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- c. Counterparty insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- d. Counterparty requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- e. Counterparty requests that payment be made to a country or geographic location which is different from where the third party resides or conducts business;
- f. Counterparty requests an unexpected additional fee or commission to "facilitate" a service;
- g. Counterparty demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- h. Counterparty requests that a payment is made to "overlook" potential legal violations;
- i. Counterparty requests that we provide employment or some other advantage to a friend or relative;
- j. We receive an invoice from a third party that appears to be non-standard or customised;
- k. Lack of transparency in the terms of engagement offered by a third party, their functioning, engagement with their employees and delivery of service, when acting on behalf of DOMS Industries;
- l. Counterparty insists on the use of side letters or refuses to put terms agreed in writing;
- m. We notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- n. Counterparty requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- o. We are offered a percentage of third party's margin in exchange for encouraging a major customer of DOMS Industries to purchase the third party's services and products;
- p. We are offered an unusually generous gift or offered lavish hospitality by a third party;

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

Wilful Ignorance:

If we wilfully ignore or turn a blind eye to any evidence of corruption or bribery within our department and/or around us, it may be taken seriously against us. Although such conduct may be "passive", where we may not have directly participated in or may not have directly benefited from, the corruption or bribery concerned, the wilful blindness to the same can, depending upon the circumstances, carry the same disciplinary action as an intentional act.

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Reporting:

Any violation or suspected violation must be reported to the Compliance Department of the Company or the Compliance Officer in line with the [Whistle Blower Policy](#). DOMS Industries is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. If you believe that you have suffered any such treatment, you should inform your supervisor or the Compliance Officer in line with the [Whistle Blower Policy](#) immediately.

Managing Conflicts of Interest

DOMS Industries is committed to conducting business with the highest ethical standards. It is important to manage conflicts of interest to ensure that we act in the best interests of the Company and avoid any situations that could compromise our judgment or decision-making.

A **conflict of interest** arises when our personal interests (financial, familial, or others) could potentially conflict with our professional duties and responsibilities to the Company. This could create an appearance of impropriety, even if no wrongdoing occurs.

Some examples of conflict of interest are demonstrated below:

1. Dealings with related parties, especially with individual relatives or entities owned or controlled directly or indirectly by relatives. For this purpose, a relative shall include spouse, siblings, children, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws. It may also include any person who is likely to influence or be influenced by us, which may materially impair fair judgement.
2. Material transactions, particularly those involving the Company's directors or executive officers. They must be reviewed and approved in writing in advance by the Company's Audit Committee. As a listed company, DOMS Industries is subject to certain legal obligations to report such material related party transactions to regulators and it is important that all such transactions be fully disclosed, conducted at arm's length and with no preferential treatment.
3. Participation by employees in any outside activity (including as an officer, director, owner, consultant, or employee) that could or appears to interfere with the performance of their or other employees' duties and responsibilities, affect their independent and objective judgment, compete with DOMS Industries, or discredit DOMS Industries in any way.
4. Personal involvement with a competitor, supplier, or another employee of the Company that might affect one's ability to exercise good judgment on behalf of the Company. Personal relationships and liaisons between employees who are in a manager-employee reporting structure may lead to team management challenges and reduced morale. Such relationships must be disclosed to the manager or a higher authority immediately, who may take appropriate corrective action.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

Disclosure:

All conflicts of interest must be disclosed to the Compliance officer in good faith. We must abstain from involving ourselves in decisions where we may be or appear to be biased, unless otherwise approved by the Compliance Department. The Board of Directors must disclose their conflict of interest as per the Companies Act, 2013 and other regulations that may be applicable.

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Prevention of Insider Trading Practices

During the course of work, there may be situations where we may become privy to various confidential and insider information that, if known to the public, may have market repercussions. “**Unpublished Price Sensitive Information**” or “**UPSI**” means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- a. financial results;
- b. dividends;
- c. change in capital structure;
- d. mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- e. changes in key managerial personnel;
- f. such other information as communicated by the designated Compliance Officer.

We are obligated to abide by the following guidelines when dealing with UPSI:

1. All information shall be handled within the Company on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the insider’s legitimate purposes, performance of duties or discharge of his legal and other official duties and obligations;
2. We shall not deal directly or through third persons, in securities of DOMS Industries or its group companies on the basis of UPSI and during the period when [trading window](#) is closed;
3. We shall intimate the Compliance Department when we receive any UPSI not already known to be in our possession by the Department;
4. We shall obtain pre-clearance before certain transactions in securities and submit a trading plan for dealing in securities of the Company based on the ‘[Code of Fair Disclosure For Unpublished Price Sensitive Information](#)’;
5. We shall not provide such information to any third party, till it becomes public;
6. We shall not provide any investment advice (whether professional or not) based on the UPSI, with or without disclosing the same;
7. We shall not deal in securities of any third party based on such UPSI.

Kindly refer to the ‘[Code of Fair Disclosure For Unpublished Price Sensitive Information](#)’ or reach out to the Compliance Department for more guidance.

Political Activities & Personal Political Contributions

DOMS Industries is apolitical and chuses to advocate government policies based on its merit. Any financial or in-kind contribution to any political parties, politicians and related institutions, as approved by the Board of Directors should be aimed at strengthening the democratic forces and should not seek to influence the outcome of public elections nor to undermine or alter any system of government.

If our work includes meetings with government or elected officials, all of which might be construed as ‘lobbying’, we must carry out these activities with high integrity and in line with Company’s policies and values. We should not claim to represent DOMS Industries at such meetings unless we are specifically designated or empowered by the Company to do so.

The Company respects the right of every person to have political and religious beliefs and affiliations that are legal and permitted by law. However, all political and religious activities are personal in nature and should not be performed during office hours and on office premises, unless otherwise approved by the Company. We may offer political contributions in our personal capacity, but such contributions should never be made as representatives of the Company.

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We must not:

- a. Use Company's time, money, or resources to support or encourage political activities;
- b. Solicit contributions for any religious or political activity or conduct any such activity in the office premises. However, offices may celebrate festivals in which all employees are invited to participate;
- c. Contribute Company funds for any political purpose without authority;
- d. Seek public related office without prior permission;
- e. Undertake or participate in any political or religious propaganda within the office premises;
- f. Join or be a member of any banned or extremist groups.

In case of any queries, kindly reach out to the Compliance Department.

Anti-Money Laundering

As per the Prevention for Money Laundering Act, 2002 (India), whosoever directly or indirectly attempts to indulge or knowingly assists or knowingly is a party or is actually involved in any process or activity connected with the proceeds of crime including its concealment, possession, acquisition or use and projecting or claiming it as untainted property shall be guilty of **offence of money laundering**.

DOMS Industries complies with all money laundering regulations, applicable in each jurisdiction in which it operates.

The following points must be kept in mind:

1. We must not accept any funds from any entity, if on become aware or have reasons to believe that these funds are derived from any kind of criminal activity, the same shall be reported to the Compliance Department of the Company;
2. We must exercise adequate care and diligence in dealing with third parties to ensure that our activities do not directly or indirectly constitute or aid in laundering proceeds of crime;
3. We must be mindful of any suspicious financial arrangements or fund transfers that we are requested to enter into by our customers, business partners or others;
4. We must maintain adequate records of our dealings with third parties, including contract letter, invoices, receipts, credit or debit notes, wherever reasonable, and preferably on the respective party's official letterhead;
5. We must not indulge in activities that constitute or likely to lead to funding criminal acts of terrorism or provide support to terrorist organisations.

Fair Competitive Practices

DOMS Industries is committed to conduct business in a fair and competitive manner that complies with all applicable antitrust and anti-competitive laws and regulations. We compete fairly and ethically without engaging in practices that restrict or eliminate competition.

We are prohibited from engaging in any activity that could violate antitrust laws or regulations, including:

1. Agreeing with competitors on prices, discounts, or other terms of sale that may create a potential conflict with the provisions of competition law;
2. Dividing markets, customers, or territories with competitors that may restrict new entrants or lead to creation of monopolies;
3. Colluding with competitors to submit non-competitive bids;
4. Using our market position to unfairly exclude competitors or stifle competition;

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5. Misappropriating or misusing a competitor's confidential information or making false statements about a competitor's business and business practices;
6. Sharing or parting with company specific information in an industry forum or enter into agreements with competitors on any matter unless we have consulted with the Compliance Department in advance.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

For more details, reach out to the Company Secretary and Compliance Officer at cs@domsindia.com or Chief Financial Officer at rahul@domsindia.com of the Company.

Whistle Blower Mechanism

In terms of the provisions of Section 177 of the Companies Act, 2013 and Rule 7 of the Companies (Meetings of the Board and its Powers) Rules, 2014 read with Regulation 22 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be amended from time to time the company has '[Whistleblower and Vigil Mechanism](#)' Policy.

The policy provides a mechanism to raise concerns internally in a responsible and effective manner if and when we discover information which we believe shows serious malpractice, instances of leak of Unpublished Price Sensitive Information and/or other genuine concern regarding governance, which adversely affects the interests of the Company. This policy encourages all the Whistle Blowers to report any kind of misuse of Company's properties, mismanagement or wrongful conduct prevailing/executed in the Company, which the Whistle Blower in good faith, believes or, evidences but are not limited to malpractices or wrongdoing / other such events which have taken place / suspected to take place involving but not limited to:

1. Breach of the Code of Conduct;
2. Violation of any law or regulations, policies including but not limited to corruption, bribery, theft, fraud, coercion and willful omission;
3. Criminal Offence having repercussions on the Company or its reputation;
4. Rebating of Commission / benefit or conflict of interest;
5. Procurement frauds;
6. Mismanagement, gross wastage or misappropriation of Company's funds / assets;
7. Manipulation of Company data / records;
8. Misappropriating cash / Company assets, leaking confidential or proprietary information;
9. Unofficial use of Company's property / human assets;
10. Activities violating Company policies;
11. A substantial and specific danger to public health and safety;
12. An abuse of authority or fraud;
13. Complaints related to the 'Sexual Harassment' as defined under the separate Policy adopted by the Company;
14. Leak or suspected leak of any Unpublished Price Sensitive Information (UPSI) as defined in the Code;
15. Sharing of undesirable content relating to the Company on any Social Media Platform.

For more details, kindly refer to the '[Whistleblower and Vigil Mechanism](#)' Policy or contact the Compliance officer.

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Use of Assets

We must use Company assets in a responsible, ethical, and lawful manner. **Company assets** include all kinds of physical assets, movable, immovable and tangible property, corporate information (including information about DOMS Industries, its vendors, suppliers, distributors), financial assets (Company credit cards, expense accounts, and company funds), software (owned or leased), intellectual property such as designs, inventions, copyrights, patents, trademarks and technology.

We shall abide by the following guidelines on use of Company Assets:

- We shall use Company assets for legitimate business purposes only. The use of assets for individual profit or any unlawful, unauthorized, personal or unethical purposes is prohibited. Personal use is generally prohibited, except for minimal personal use with prior management approval, provided it does not interfere with work duties or incur additional costs for the company. The use of Company assets for political purposes is strictly prohibited.
- We are responsible for safeguarding the Company's assets from loss, theft, damage, or unauthorized use during the course of our work. This includes handling physical assets with care, reporting lost or stolen assets immediately, using strong passwords and following access and data security protocols.
- We shall install only authorized software on Company devices. Copying or distributing software licenses, designs or inventions without permission is strictly prohibited.
- We shall use Company credit cards, expense accounts, and company funds for legitimate business expenses only. Personal expenses are not permitted. Employees are required to maintain accurate and complete expense records.
- Company vehicles should be used for business purposes only. Employees must comply with all traffic laws and regulations. Personal use may be permitted after receiving a management approval.
- Employees are responsible for protecting company data and value chain information. This includes following procedures for data access, storage, and disposal, and avoiding unauthorized sharing of sensitive information.
- Company's electronic facilities and systems, provided for use in business, must be used carefully. We must give careful thought to the appropriate medium, the substance, and the distribution of electronic messages to avoid overburdening the systems. We shall not download, copy, access or transmit to third parties the works of others without their permission.
- Upon the termination of employment or service engagement with DOMS Industries, we must hand over all of DOMS Industries' assets in our possession to the Human Resources Department or any such department as may be designated by DOMS Industries from time to time for this purpose. DOMS Industries further retains the absolute right to restrict, monitor, modify and delegate the use of its assets by any person.

Protection of Company Assets

Confidentiality Obligations

"**Confidential Information**" shall mean all non-public information, regardless of the form or medium in which it is contained, which is in the possession of the stakeholder, including but not limited to:

1. Non-public financial information of the Company;
2. Business plans, strategies, and marketing plans;
3. Supplier or distributor information;

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Website:

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4. Trade secrets, designs, inventions, and know-how;
5. Unpublished technical data and information;
6. Information regarding potential mergers, acquisitions, joint ventures, partnerships or divestitures;
7. Any third-party information protected by non-disclosure or confidentiality agreements;
8. Any other information designated as confidential by the Company;

The following points must be kept in mind with respect to Confidential Information:

- We agree to hold in confidence and not disclose, directly or indirectly, any Confidential Information to any third party without the prior written consent of the Company;
- Confidential Information should not be used for personal advantage or for the advantage of a third party;
- We must take care in ensuring the privacy of data of our employees and business partners. We must ensure that personal identifiable information of employees and/or business partners, customers, etc. is treated as confidential and protected from unwarranted disclosure;
- We shall comply with the terms of all confidentiality or other agreements relating to information received from third parties unless the disclosure is made with the written consent of the Company or where law requires the disclosure.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy. For more details, please get in touch with the Compliance officer.

Protection of Intellectual Property

Intellectual Property includes, but is not limited to:

- a. Inventions;
- b. Patentable new products, processes, or machines;
- c. Copyrights including original works of authorship such as software, literary works, and artistic creations;
- d. Trademarks including words, symbols, or designs used to identify and distinguish the source of goods or services;
- e. Trade Secrets and any information that may provide our peers a competitive advantage.

DOMS Industries shall at all times retain absolute ownership of all intellectual property created by it, for it or on behalf of it. It includes supporting documents, worksheets, papers and/or data that are supplementary to the intellectual property. We shall not copy, transmit, remove or alter such data except in pursuance of our official duties, with prior approval of the management.

To the extent permitted by the law, the rights to all intellectual property created using the Company's time, resources and expenses and which are within the scope of our duties are assigned to and are the property of the Company. We must endeavor to disclose our inventions, research and ideas to the management promptly to obtain legal protection.

We must not infringe or violate the intellectual property rights of others and should use proprietary material of others only under valid licenses & in accordance with the terms of such licenses. Any unauthorized receipt or use of the intellectual property of others may expose the Company to civil & criminal liabilities and hence we must strictly adhere by all Company policies & procedures, including those governing the appropriate handling of unsolicited intellectual property.

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Maintaining Accurate Records

Company records include company information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business.

DOMS Industries is committed to maintaining accurate business and financial records. Accurate record keeping and reporting reflect on the Company's reputation and credibility, and ensure that the Company meets its legal and regulatory obligations.

We shall strive to maintain appropriate controls and processes to capture and store information. All records shall be maintained on a true and fair basis, upholding high standards of integrity. In case of any advertent inaccuracy comes to our observation, we shall take immediate steps for its rectification, including, wherever required, notifying the management about the observation.

Administration of the Code

Reporting Violations of the Conduct

DOMS Industries is committed to adhering to the highest ethical standards. We are responsible for ensuring that we fully comply with this Code of Conduct and Ethics and the policies governing the Company's business dealings.

We have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations, or policies that apply to the Company. If we know of or suspect a violation of this Code, we must immediately report the conduct to the Company Secretary and Compliance Officer at cs@domsindia.com or the Chief Financial Officer at rahul@domsindia.com. Alternatively, we may use the [Whistleblower and Vigil Mechanism](#) Policy to report known or suspected violations.

The Company prohibits retaliation against anyone who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against a person for seeking help or filing a report, in good faith, will be subject to disciplinary action, including potential termination of employment.

Investigation

All matters reported shall be subject to basic checks and controls to validate whether the matter is genuine and falls within the ambit of the Code. In case of ambiguity, a detailed investigation may be undertaken. The investigation shall be undertaken by an external investigator agency or Compliance officer or any other person or Committee as deemed fit by the Board of Directors. In all cases, the investigating officer should be impartial and should not have or appear to have a conflict of interest.

We are expected to cooperate during the investigation process and provide necessary assistance including documents, information and/or physical presence wherever needed to address the matter expeditiously.

In case the matter at hand involves violation or suspected violation by any senior managerial personnel or director, the matter shall be dealt with by the Audit Committee. The Audit Committee shall decide to deal with such Complaint as it deems fit, including appointing any investigation agency to investigate such Complaint and report to the Audit Committee.

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Review & Modification

The Board of Directors shall be authorized to approve this Code. The Code shall be reviewed at least annually by the Compliance Officer, or any other person the management deems fit, to ensure that Code remains relevant and updated. Any subsequent modifications to the Code shall have to be approved by the Board of Directors.

Waivers

Waivers of this Code may be approved in exceptional cases only by the Managing Director or the Whole-time Directors of the Company. However, any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by the Board of Directors and will be disclosed at relevant places or as required by applicable law or stock exchange regulations.

Penalties & Disciplinary Action

It is Company policy that any employee who violates this Code will be subject to appropriate discipline, which may include reprimand, verbal warning, written warning, probation, suspension or blacklisting, termination of employment or business contract, litigation (civil and/or criminal), recovery of damages suffered by the Company or other disciplinary action the Company deems fit.

This determination will be based upon the facts and circumstances of each situation. Any person accused of violating this Code will be given an opportunity to present his or her version of the events for the issue at hand, prior to any determination of appropriate discipline. Persons who violate the law or this Code may expose themselves to substantial civil damages, criminal fines, and/or prison terms as per applicable laws.

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