

FUJIYAMA POWER SYSTEMS LIMITED

CODE OF CONDUCT FOR EMPLOYEES AND WORKERS

1. INTRODUCTION

Fujiyama Power Systems Limited (“Company”) is committed to conducting its business with honesty, integrity, fairness, safety, and respect for people and the environment. This Code of Conduct (“Code”) sets out the standards of behavior expected from all employees, workers, trainees, contract workers, and associates of the Company.

The purpose of this Code is to:

- Promote ethical and professional conduct;
- Ensure compliance with applicable laws, regulations, and Company policies;
- Maintain a safe, respectful, and productive workplace;
- Protect the Company’s assets, reputation, and confidential information; and
- Encourage responsible and accountable behavior.

Every employee and worker is required to read, understand, and follow this Code in letter and spirit while performing duties for the Company.

2. SCOPE

This Code applies to:

- Permanent employees;
- Temporary employees;
- Workers and operators;
- Contract labour;
- Apprentices and trainees; and
- Any individual working on behalf of the Company.

This Code applies at:

- Company premises;
- Manufacturing plants and warehouses;
- Offices and branch locations;
- Customer or supplier sites;
- Company-sponsored events; and
- Any location where employees represent the Company.

3. HONESTY AND ETHICAL CONDUCT

All employees and workers are expected to:

- Perform their duties honestly, sincerely, and responsibly;

- Maintain high standards of integrity and professionalism;
- Avoid fraud, theft, cheating, or misrepresentation;
- Treat customers, suppliers, colleagues, and visitors fairly and respectfully; and
- Follow Company policies and lawful instructions.

Employees shall not engage in any activity that may harm the Company's reputation or business interests.

4. COMPLIANCE WITH LAWS AND COMPANY POLICIES

Employees and workers must comply with:

- Applicable laws, rules, and regulations;
- Factory and labour laws;
- Health and safety requirements;
- Environmental regulations; and
- Company policies, procedures, and work instructions.

Employees must cooperate during audits, inspections, and investigations conducted by the Company or regulatory authorities.

5. WORKPLACE DISCIPLINE AND PROFESSIONAL BEHAVIOUR

Employees and workers are expected to:

- Maintain punctuality and regular attendance;
- Follow reporting and shift timing requirements;
- Perform assigned duties carefully and efficiently;
- Obey lawful instructions from supervisors;
- Maintain cleanliness and discipline at the workplace; and
- Wear prescribed uniforms, safety gear, and identity cards.

The following behaviors are strictly prohibited:

- Fighting, abusive language, or threatening behavior;
- Intoxication or use of alcohol/drugs at work;
- Gambling on Company premises;
- Carrying unauthorized weapons;
- Sleeping during duty hours without authorization; and
- Deliberate damage to Company property.

6. HEALTH, SAFETY, AND ENVIRONMENT

The Company is committed to providing a safe and healthy workplace.

All employees and workers must:

- Follow all safety rules and procedures;
- Use personal protective equipment (PPE) properly;
- Report unsafe conditions, accidents, or near-miss incidents immediately;

- Operate machinery only when authorized and trained;
- Avoid unsafe acts or shortcuts;
- Maintain housekeeping standards; and
- Support environmental protection initiatives.

Employees must never bypass safety systems or operate equipment in an unsafe manner.

7. ANTI-BRIBERY AND ANTI-CORRUPTION

Employees and workers shall not:

- Offer or accept bribes, kickbacks, or improper payments;
- Demand money or favors for Company-related work;
- Misuse Company authority for personal gain; or
- Engage in any corrupt or unethical practice.

Any suspected corruption or unethical activity must be reported immediately.

8. CONFLICT OF INTEREST

Employees and workers must avoid situations where personal interests conflict with Company interests.

Employees shall not:

- Work for competitors without approval;
- Use Company resources for personal business;
- Influence Company decisions for personal benefit; or
- Engage in activities that affect job performance.

Any actual or potential conflict of interest must be disclosed to the HR Department or reporting manager.

9. RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, AND COLLEAGUES

Employees and workers are expected to:

- Maintain professional and respectful relationships;
- Provide quality service and support;
- Deal fairly with suppliers and business partners;
- Avoid rude or discriminatory behavior; and
- Promote teamwork and cooperation.

Employees must not misuse their position to obtain personal benefits from customers, vendors, or contractors.

10. CONFIDENTIALITY

Employees and workers must protect confidential information related to:

- Company operations;
- Manufacturing processes;

- Product designs and technology;
- Financial information;
- Customer and supplier data;
- Employee information; and
- Business plans and pricing.

Confidential information must not be disclosed to unauthorized persons during or after employment.

Employees shall not share Company information through social media, messaging applications, or external parties without authorization.

11. USE OF COMPANY ASSETS

Company assets must be used responsibly and only for authorized business purposes.

Company assets include:

- Machinery and tools;
- Vehicles and equipment;
- Computers and mobile devices;
- Raw materials and finished goods;
- Office supplies; and
- Intellectual property and data.

Theft, misuse, unauthorized removal, or damage to Company property is strictly prohibited.

12. SOCIAL MEDIA AND PUBLIC COMMUNICATION

Employees and workers must behave responsibly on social media and in public.

Employees shall not:

- Post confidential Company information online;
- Make false or damaging statements about the Company;
- Represent personal opinions as Company views; or
- Use Company logos or branding without approval.

Only authorized persons may communicate with media or external agencies on behalf of the Company.

13. HUMAN RIGHTS, DIVERSITY, AND INCLUSION

The Company respects human rights and promotes equal opportunity.

The Company does not tolerate:

- Child labour;
- Forced labour;
- Discrimination;
- Harassment; or
- Abuse of any kind.

Employees and workers must treat everyone with dignity and respect regardless of:

- Gender;
- Religion;
- Caste;
- Race;
- Age;
- Disability;
- Nationality; or
- Social background.

14. ANTI-HARASSMENT AND RESPECTFUL WORKPLACE

Harassment, intimidation, bullying, or abusive conduct is strictly prohibited.

This includes:

- Sexual harassment;
- Verbal abuse;
- Physical intimidation;
- Offensive gestures or comments; and
- Any conduct creating a hostile work environment.

Employees are encouraged to report complaints without fear of retaliation.

15. ATTENDANCE, LEAVE, AND WORK HOURS

Employees and workers must:

- Follow approved work schedules;
- Record attendance honestly;
- Obtain approval for leave or absence;
- Avoid unauthorized absenteeism; and
- Follow overtime and shift procedures.

Habitual absenteeism or falsification of attendance records may lead to disciplinary action.

16. PROTECTION OF COMPANY RECORDS

Employees and workers must maintain accurate records related to:

- Production;
- Quality checks;
- Attendance;
- Inventory;
- Safety reports; and
- Financial or operational activities.

Falsification or manipulation of records is strictly prohibited.

17. REPORTING VIOLATIONS

Employees and workers must promptly report:

- Unsafe conditions;
- Theft or fraud;
- Harassment or discrimination;
- Corruption or bribery;
- Violations of Company policies; or
- Any illegal or unethical activity.

Reports may be made to:

- Immediate supervisor;
- Department Head;
- HR Department; or
- Compliance Officer.

The Company prohibits retaliation against anyone who reports concerns in good faith.

18. DISCIPLINARY ACTION

Violation of this Code may result in disciplinary action, including:

- Verbal warning;
- Written warning;
- Suspension;
- Recovery of losses;
- Termination of employment; and/or
- Legal action where applicable.

Disciplinary action will depend on the seriousness and nature of the violation.

19. AMENDMENTS TO THE CODE

The Company reserves the right to amend, modify, or update this Code from time to time in accordance with business requirements and applicable laws.

20. INSIDER TRADING AND UPSI

Fujiyama Power Systems Limited is committed to complying with the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

During the course of employment, employees and workers may have access to confidential or unpublished information relating to the Company, its customers, suppliers, business operations, financial performance, expansion plans, contracts, projects, or other sensitive matters.

Employees and Workers Shall:

- Not trade, buy, sell, or deal in the securities of the Company while in possession of UPSI.
- Maintain strict confidentiality of all Unpublished Price Sensitive Information (UPSI) and other confidential business information.
- Not communicate, provide, share, discuss, or disclose UPSI to any unauthorized person, including family members, friends, business associates, vendors, customers, or social media platforms.
- Not use UPSI for personal gain or for the benefit of any other person.
- Follow all applicable Company policies relating to insider trading, confidentiality, and information security.
- Immediately report any suspected leakage, misuse, or unauthorized disclosure of UPSI to the Compliance Officer.

21. APPROVAL

This policy is approved by the management of Fujiyama Power Systems Limited and comes into effect from 24 August 2026