



(Formerly known as APPL Containers Private Limited)

We Run With Quality

MANUFACTURER AND EXPORTER OF ALL TYPE OF CONTAINERS

- Survey No. 131-B, 132, 132P1, Near Khodiyar Mandir, Bhavnagar-Rajkot Highway, Shampara (Khodiyar), Shampara, Bhavnagar, Gujarat, 364060
- CIN :- U28129GJ2021PLC126531

CODE OF CONDUCT OF BOARD OF DIRECTORS AND SENIOR MANAGEMENT PERSONNEL

APPL CONTAINERS LIMITED



FOR APPL CONTAINERS LIMITED

DIRECTOR



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1. INTRODUCTION:

A Code of Conduct is applicable to members of the Board and Senior Management Personnel of APPL Containers Limited (hereinafter referred to as "**Company**") is prepared in accordance with the requirements of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time

2. PURPOSE

The Company's objective in establishing this "Code of Conduct" is to promote ethics, honesty and professionalism within the Company. The matters covered in the Code are of utmost importance to the Company, its shareholders and other stakeholders and are essential so that it can conduct business in accordance with ethical values to which it is strongly committed. Officers are expected to read and understand this code, uphold these standards in day to day activities and comply with all the policies and procedures.

The Directors and Senior Management Personnel of the Company are expected to read and understand the Code of Conduct and uphold these standards in their day-to-day activities, comply with all applicable policies and ensure compliance. This code shall serve as a guide to the Directors and Senior Management Personnel of the Company on the principles of Integrity, transparency, business ethics and to setup standards for compliance of Corporate Governance.

3. COMPLIANCE WITH LAWS, RULES, REGULATIONS

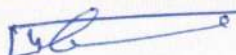
The Directors and Senior Management Personnel shall act in the best interest of the Company. The Directors and Senior Management Personnel are also expected to:

- a) Comply with all applicable laws, regulations, obligations and other corporate policies of the Company;
- b) Follow all policies, procedures and internal control systems of the Company;
- c) Act honestly, in good faith and in the best interests of the Company.

4. ETHICAL CONDUCT

The Directors and Senior Management Personnel of the Company shall conduct their activities on behalf of the Company and on their own behalf, with honesty, integrity and fairness. The Directors and Senior Management Personnel of the Company will act in good faith, responsibility, with due care, competence and diligence, without allowing their independent judgement to be subordinated. The Directors and Senior

FOR APPL CONTAINERS LIMITED



DIRECTOR



Management Personnel of the Company will act in the best interests of the Company and fulfill the fiduciary obligations.

5. CONFLICT OF INTEREST

The Directors and Senior Management Personnel of the Company should not enter into any transaction or engage in any practice, directly or indirectly, that would tend to influence him/her to act in any manner other than in the best interests of the Company. Every Director and Senior Management Personnel should make a full disclosure to the Board of any transaction that they reasonably expect, could give rise to an actual conflict of interest with the Company and seek the Board's authorization to pursue such transactions.

6. CONFIDENTIALITY

Information relating to any client or activities of the Company is strictly confidential and shall not be disclosed orally or in writing or electronically, directly or indirectly to anyone unless the Directors/Senior Management personnel have been specifically authorized to release this information.

The Company's confidential and proprietary information shall not be inappropriately disclosed or used for the personal gain or advantage of any Director. These obligations apply not only during a Director's term, but thereafter as well unless the said information becomes public.

7. INSIDER TRADING

Directors/ Senior Management personnel shall not deal in the securities of a Company either on their own account or their relative's account if they are in possession of any unpublished price sensitive information concerning the Company. None of the Directors or the Senior Management Personnel shall derive any benefit nor assist others to deriving benefit by giving investment advice from access to and possession of information about the Company, which is not in public domain and constitutes insider information.

8. FAIR DEALING

The Directors and Senior Management Personnel should endeavour to deal fairly and not seek to

take unfair advantage of the Company through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing.



FOR APPL CONTAINERS LIMITED

A handwritten signature in blue ink, appearing to be "V. G.", written over a horizontal line.

DIRECTOR

9. PROTECTING COMPANY ASSETS

Every Director and Senior Management Personnel should endeavour to ensure that they use the Company's assets, proprietary information and resources only for the legitimate business purposes of the Company and not for their personal gains. The assets of the Company shall not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, resources as well as tangible assets such as proprietary information.

10. FALSE OR MISLEADING STATEMENTS

Directors/Senior Management Personnel shall not make a statement or disseminate any information, which is misleading or false and is likely to induce sale or purchase of securities by any other person or is likely to have the effect influencing the market price of the securities.

11. MAINTENANCE OF ACCURATE BOOKS AND RECORDS

Company shall prepare and maintain its accounts fairly and accurately and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of India. Every business transaction undertaken by the Company must be recorded in its books accurately and in a timely manner. There shall be no willful omissions of any transactions of the Company from the books and records.

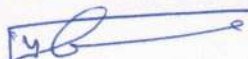
12. DISCRIMINATION AND HARASSMENT

Company believes in providing equal opportunity to all the employees in every aspect of employment. Any discrimination against any employee whether based on gender, region, community or religion or harassment or derogatory comments against any employees will be seriously viewed and will be subject to disciplinary action and might entail termination of employment. Harassment shall also include violent or threatening behaviour against any employee.

13. NON-COMPLIANCE

Suspected violations of this Code may be reported to the Chairman of the Board or the Chairman of the Audit Committee. All reported violations shall be appropriately investigated. Any waiver of this code must be approved by the Board of Directors and publicly disclosed if required by any applicable law or regulation.

FOR APPL CONTAINERS LIMITED



DIRECTOR

