

# CODE OF CONDUCT

Crystal Crop Protection Limited

# Vision and Mission of Crystal

## VISION

To be amongst the most admired crop solution companies by providing innovative, cost-effective products & services.

## MISSION

To work closely with farming community and improve farm profitability & sustainability by advancing R&D in crop protection, seeds and farm mechanization services.

# CRYSTAL

## FITEC Values

### FAMILY

We work like a family and build our future on its foundation

### INTEGRITY

Be honest, reliable and a role Model

### TRANSPARENCY

We encourage discussions with openness, respect and mutual trust

### ENTREPRENEURSHIP

We take complete ownership and responsibility of our work

### CUSTOMER CENTRICITY

We put our customer at the center of what we do



# MEANING AND IMPORTANCE OF CODE OF CONDUCT

An employee code of conduct is a legal document that provides guidelines on acceptable behaviors of individuals in an organization

- Helps to be agile and get accustomed to the culture of the Company
- Helps to report an issue which falls under COC
- Helps to be in line and follow rules
- Helps Company to track an employee's behavior.

# ELEMENTS OF THE CODE

- Compliance with Applicable Laws
- Bribery and Corruption
- Environment, Health and Safety (EHS)
- Advertising and Marketing Activities
- Business Integrity
- Confidentiality and Conflict of Interest
- Documentation and contractual obligations
- Contribution to Society and Communities
- Protection of Assets and Intellectual Property Rights
- Stewardship and Product Safety
- Labor Rights
- Diversity, Discrimination and Harassment
- Electronic and Social Media Usage

# Compliance with Applicable Laws

Some examples of the applicable acts are:

- Companies Act, 2013
- Environment (Protection) Act, 1986
- Factories Act, 1948
- Income Tax Act, 1961
- Foreign Exchange Management Act, 1999
- Insecticides Act, 1968
- Maternity Benefit Act, 1961
- Seeds Act, 1966

**What do you do in case of any violation?**

Any violation of the applicable laws should be reported to the Reporting Manager or use whistle blower mechanism.



# Bribery and Corruption

Crystal promotes fair dealings with various public authorities, institutions and other third parties by:

- a) Safeguarding the value of integrity
- b) Prohibits to offer any amount, inducement or gifts



## Are gifts and gratuities considered as bribe?

Only gifts and entertainment offered as customary practice is an exception.

For eg: during Diwali celebrations gifts are shared with the employees, Vendors, and such other parties as a token of gratitude.



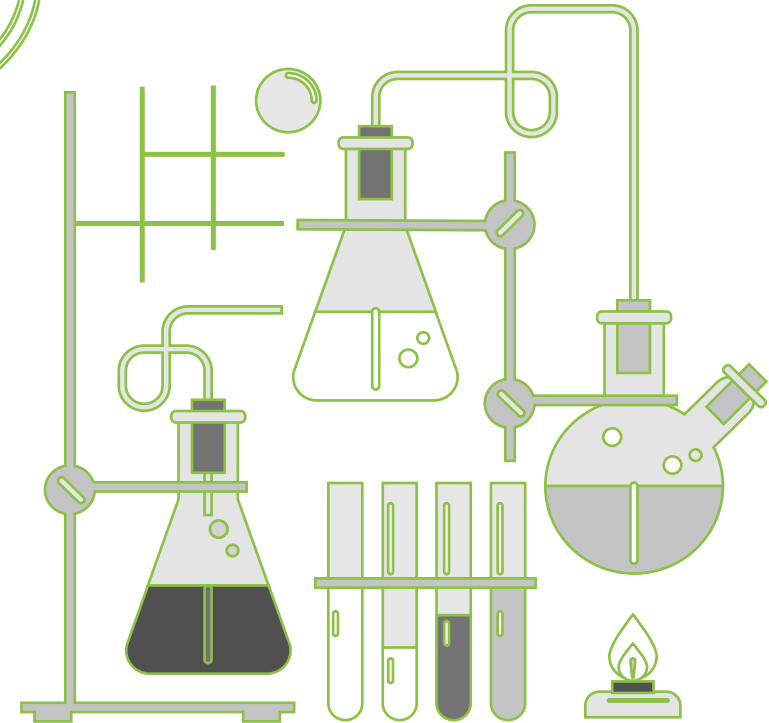
# Environment, Health and Safety (EHS)

It includes:

- Protection of the environment;
- improve the health and safety of employees;
- ensure well-being of other stakeholders.

**How do we ensure to maintain EHS standards at Crystal?**

Proper training, knowledge sharing transparent communication, continuous reviews and consultation for EHS activities shall maintain the EHS standards.







## Advertising and Marketing Activities

- All codes on advertising and marketing practices should be followed
- Applicable laws should be complied
- Promise realistic claims
- Avoidance of giving statements based on unproven facts.

# Business Integrity

- Building trust in the stakeholders
- encourage good business practices
- Should follow Honesty, fairness and reliability



# Confidentiality and Conflict of Interest

1. Prohibition to make unauthorized disclosure or leakage of confidential information to third parties.
2. Employees must not use material non-public/ price sensitive information for self gain or for others.
3. Employees to avoid situations which may create conflict of interests.

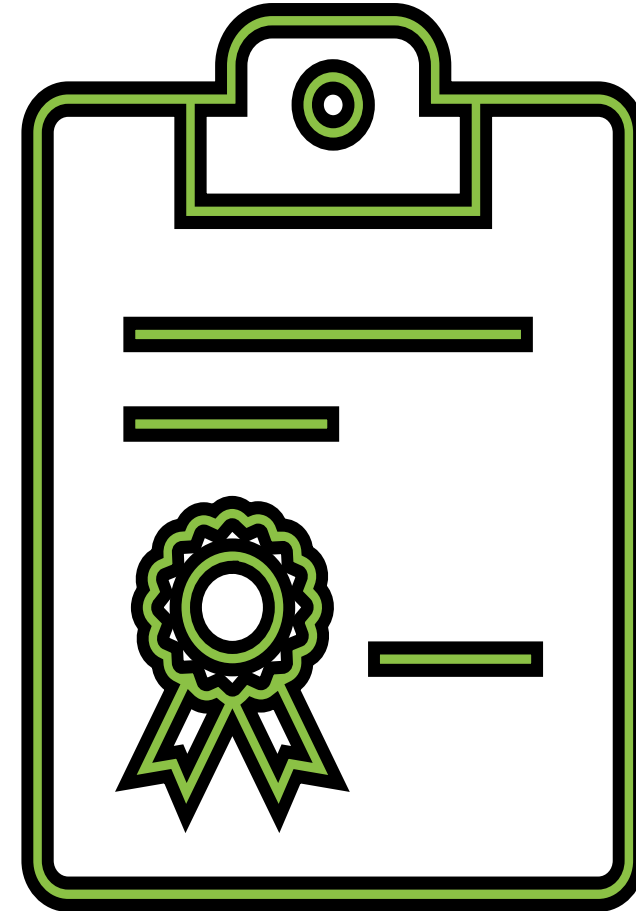
**Can you give an example of personal benefit ?**

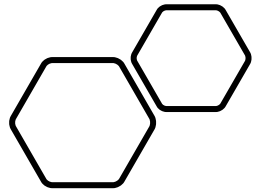
Any personal benefit that arises from corporate opportunities that are discovered by use of Company's property, information, or position.



# Documentation and contractual obligations

- Employees should ensure that the contractual obligations are met by the Company.
- Maintenance of Documents of the Company as per Company's Policies.
- All legal documents (such as agreements, notices, MOUs, etc.) should be properly stored, shared with the custodian of such documents.



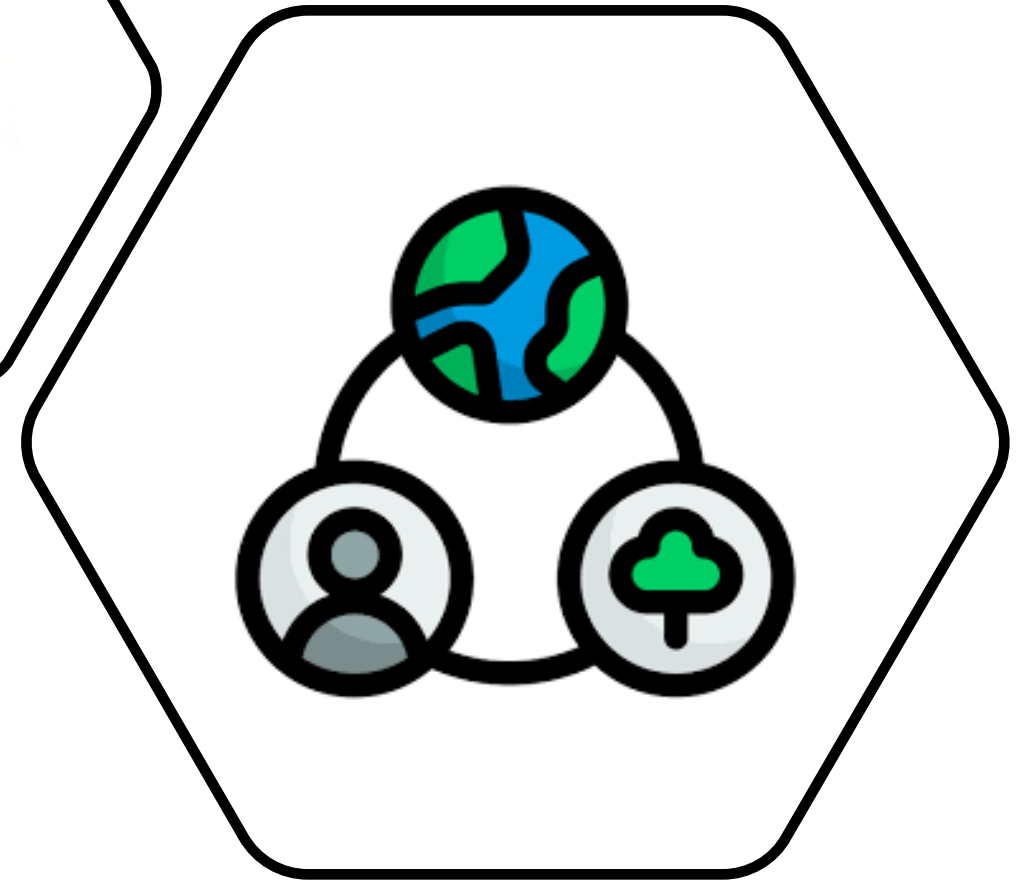


## Contribution to Society and Communities

Crystal is committed to make a positive contribution to the society in which it operates.

We are primarily focused on

- Health
- Education
- Women empowerment
- Animal welfare



# Project Outcome

## Naturopathy College Construction



## Ekal Vidyalaya



## Eklavya School



# Contd..

## Animal Welfare:

Supported Gopal Gosadan and Shri Krishna Gaushala for promotion of animal welfare. The noble initiative helped in arrangement of cow shelter, management of sick cows through proper medical care and arrangement of fodder. More than **13000 cows** have been supported with the intervention.



## Samvid Skill Training School:

The company has supported Vatsalya Gram -Param Shakti Pith for imparting vocational training to destitute women /widows and abandoned children so that they can obtain gainful employment through skill acquaintance. More than **500 beneficiaries** have been benefitted under this initiative in Mathura, Uttar Pradesh.





# Protection of Assets and Intellectual Property Rights

- IPRs includes:
  - Innovation, know how;
  - Trademarks, patents, Copyrights etc.
- The employees are expected to respect the property and also vigorously defend the property rights of the Company.
- Employee should ensure that Company's assets both tangible and intangible should be efficiently used for Company's business only and not for personal gain.

## What if I use or disseminate such information?

Unauthorized disclosure, use and dissemination of any proprietary information will result in violation of code and may attract corrective actions.



# Stewardship and Product Safety

- Ensure delivery of quality products, and avail proper trainings for using any product of the Company.
- Impart adequate training to its employees and customers.
- To rigorously test the products inhouse before being launched for its safety to the crop and environment.



Every responsible person shall affirm that:

“We will carefully identify hazards, assess risks associated with the use and alert users of consequences from misuse of a product on the product package, leaflet and label.”

# Labor Rights

- To comply with all domestic labor laws applicable in different states and local industry practices.
- Not to use forced, bonded or compulsory labor and refrain from employment of any child labor practices across our offices, manufacturing units, R&D work locations, depots or warehouses.
- Proper display of abstract of acts, record of wages, medical facilities are being maintained in all units.



# Diversity, Discrimination and Harassment

Where can I find the  
Policies of the Company?

You may check the website  
of the Company for the  
policies and related details.



- To value diversity and culture that allows individual to contribute to his or her fullest potential.
- Recruitment of employees shall be done without any biased opinion.
- Not to tolerate discrimination based on race, sex, religion, creed, nationality, disability, political views
- Treat every colleague with dignity, fairness and respect

# Electronic and Social Media Usage

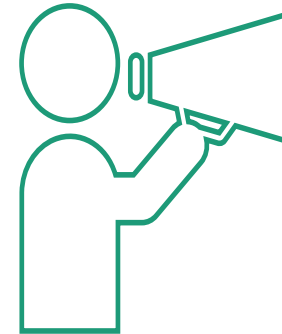
- All employees are expected to follow social media norms in accordance with the applicable laws.
- Not to use social media for any activity that may violate applicable laws, policies
- Post any content in relation to the Company or its business or personnels that may have obscene content or containing any derogatory political or religious remarks.

Please use Social Media Prudently, as you are representing Crystal.



# Reporting Mechanism

S. No.	Reporting Channel	Contact Information	Availability
1.	Telephone	011-47006800 Extn: 1489	10 AM to 5 PM on Monday to Friday
2.	Email	<a href="mailto:reachout@crystalcrop.com">reachout@crystalcrop.com</a>	24 x 7
3.	Post	Compliance Officer, B-95, Wazirpur Industrial Area, Delhi-110052	24 x 7



If you have wish to report a concern

The investigation proceeds of the violations shall be carried out as per the Company’s Whistle Blower Policy.

# FAQs

## **Q. Why Code of Conduct is important?**

The main purpose of a code of conduct is to set and maintain a standard for acceptable behavior to all stakeholders in a company. It is a reminder to the employees of what is expected from them. It further highlights that their actions should be always aligned with the ethos of the business. In addition, it provides an understanding of consequences and disciplinary actions if the conduct is broken.

## **Q. When does the Code of Conduct apply?**

The examples include:

- During presence at the Company's workplaces.
- At work-related events such as training(s) or other programs
- On social media, while representing the Company or interacting with other employees or the public at large

## **Q. Who can file a complaint?**

A report may be filed of a violation of the Code of Conduct or other misconduct or inappropriate behavior by an employee, event attendee, contractor, and/or volunteer to the Authorised Personnel.

# FAQs

## **Q. Can anonymous reporting be done?**

Yes. Anonymous reports may be filed by a victim, a first-hand witness, or any person who feels it is important that the incident be documented. The report should include details about the person who performed the misconduct or behavior, the person who was harmed (if they have consented to their name being disclosed), and the behavior that is in conflict with the Code of Conduct or illustrates misconduct.

## **Q. What about false accusations?**

False accusations are not only incredibly rare but are less common than people choosing not to report at all. The risk a person takes for reporting an incident (not being believed, being ostracized, facing further harassment/abuse from the original person or their friends/supporters, losing financial/professional opportunities, etc) is so great that it would not be worth it for a person to falsely accuse.

## **Q. Who negotiates/ tracks and documents the internal investigations?**

Internal investigations will be assigned to authorized personnel as determined by the Compliance Committee of the Company and all reports filed through this process handled internally, are tracked and documented.



# FAQs

## **Q. What are the possible outcomes of a violation?**

There are several possible outcomes including verbal and/or written reprimand, required training, counselling, probation, and suspension/expulsion from employment/leadership. Individuals may be required to provide documentation to demonstrate that they have met certain conditions before they can rejoin the organization, resume leadership responsibilities, or participate in any activities of the Company. If the violation relates to specific events, the individual may also be banned from future participation in those events even if employment is restored.

## **Q. What is the difference between Code of Conduct and Whistle Blower Policy?**

Code of Conduct is a set of rules/principals to be followed by every employee of the Company, whereas Whistle Blower Policy provide for the mechanism for reporting of different kinds of concerns to the authorised personnel of the Company, irrespective if it is reported by an employee or any person outside of the Company.

**Certificate**

I .....

Employee no. .... hereby certify that

- 1. I have received and carefully read Crystal Code of Conduct
- 2. I understand the Company's Code of Conduct.
- 3. I will fully comply with the terms of the Code of Conduct and report any known violations according to the procedures.

(Signature)

Date :

# ***WHISTLE BLOWER POLICY***

***Crystal Crop Protection Limited***



# INTRODUCTION

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Whistle Blowing is an act of free speech, which work as an anti-corruption tool cum an internal management dispute mechanism.

It involves the revelation of

A) Misconduct

B) Illegality occurring in an organization.

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# SCOPE OF WHISTLE BLOWER POLICY



Crystal expects its employees, directors, ex-employees, vendors, suppliers and other stakeholders to report any conduct or behaviour that is divergent to its values and code of conduct including:

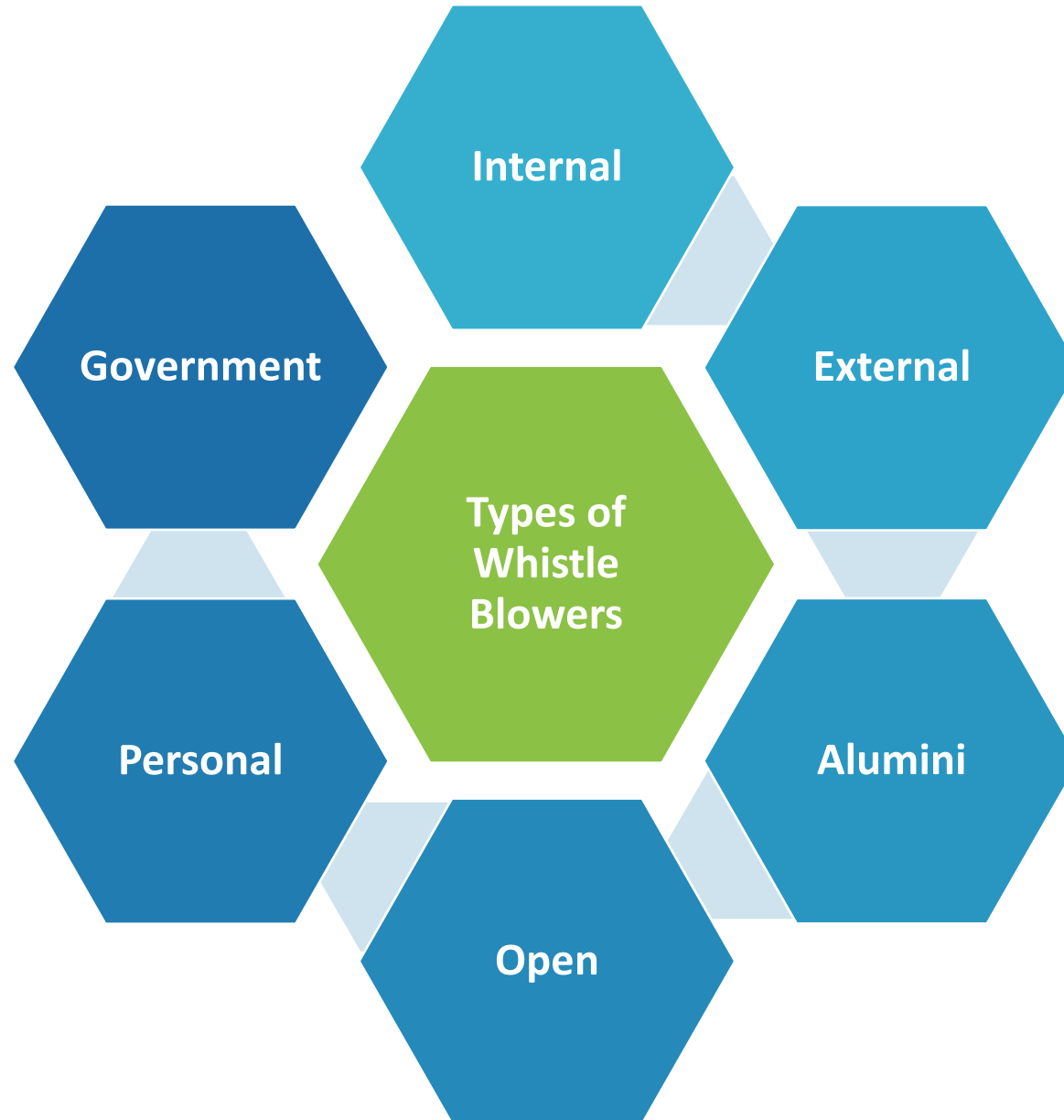
- Violation of Code of Conduct
- Inaccuracy in maintaining the company's books of account and financial records
- Financial fraud of any nature
- False expense reimbursement
- Concurrent employment
- Misuse of unpublished price sensitive information of the Company

## Who is a Whistle Blower ?

Whistleblower is an individual who, without authorization, reveals private or classified information about an organization, usually related to wrongdoing or misconduct.



# TYPES OF WHISTLE BLOWERS







# Protection for the Whistle Blower



**The Chairman of the Audit Committee & Ombudsperson provides oversight to this initiative.**



**Whistle-blower is protected from any adverse action which includes discrimination, victimization, retaliation, demotion, threat, intimidation, harassment or adoption of any unfair employment practices.**



**No protection under false allegations**



**All inter-office correspondence will be done with a Unique Complaint Number (UCN)**

## **Exclusion of the Policy**

(a) Terms and conditions of  
employment

(b) Need for infrastructure or  
facilities

(c) Sexual harassment at  
workplace

# Management Decisions

Disciplinary or corrective action including legal action

May reward the whistle-blower at management discretion

The Chairman of the Audit Committee will ensure protection of the whistle-blower

# Interim Actions

- Transfer/suspend the alleged official/person;
- Confiscate all the records and devices from the alleged official/person for the purpose of investigation;
- Restrain the alleged official/person to resume his/her duties or access the premises of the Company and its other offices;
- Any other actions as may be deemed necessary.

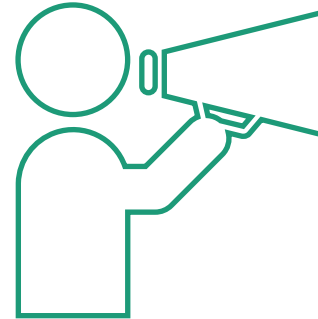
# Reporting Mechanism

**How can you report?**

**The whistle blower can use following range of reporting channels for reporting any issue which is covered under the scope of the policy:**

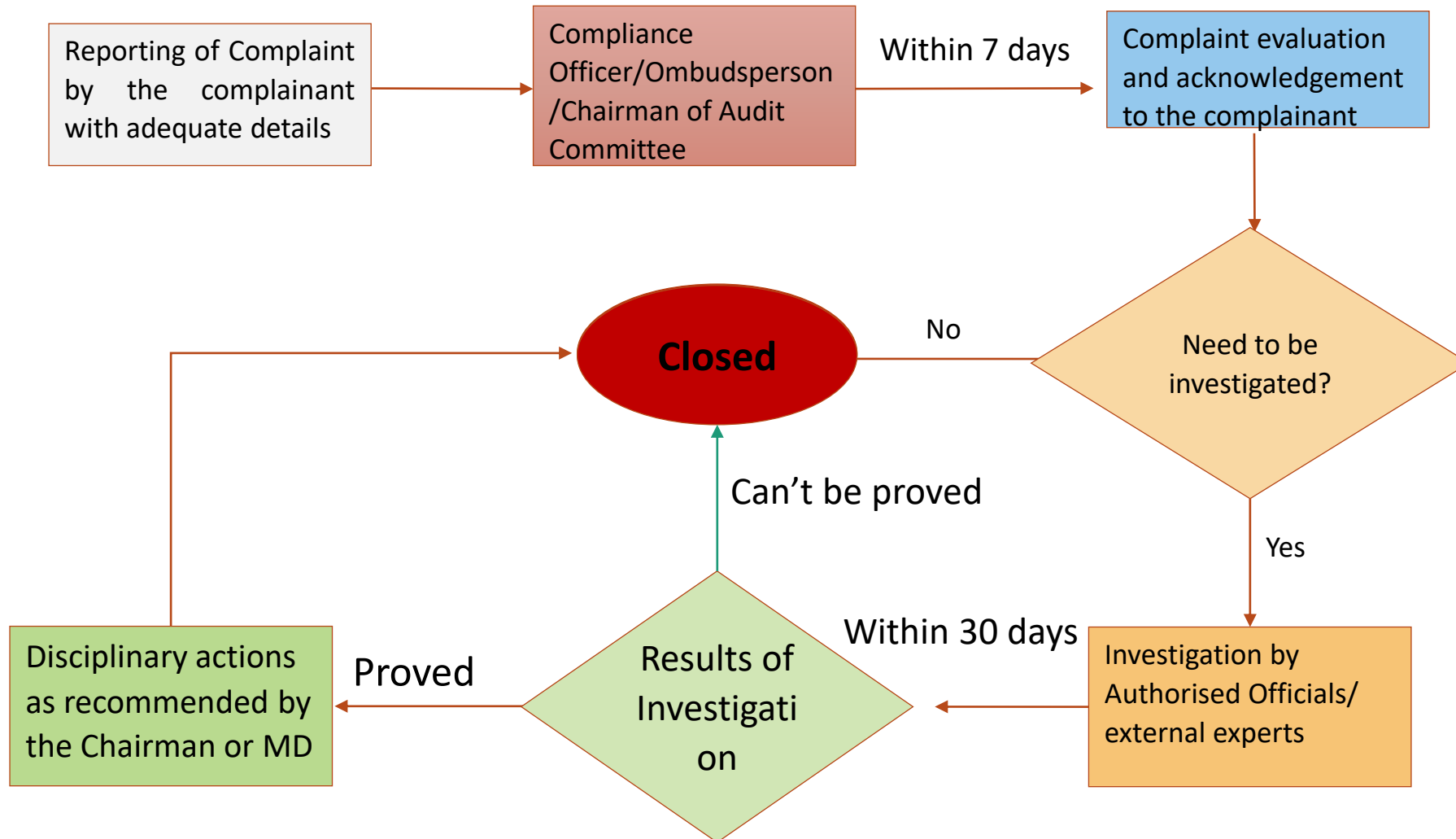
**Contact Person: a) Primary: Compliance Officer and/or Ombudsperson**

**b) Secondary: The Chairman of the Audit Committee**



S. No.	Reporting Channel	Contact Information	Availability
1.	Telephone	011-47006800 Extn: 1489	10 AM to 5 PM on Monday to Friday
2.	Email	<a href="mailto:reachout@crystalcrop.com">reachout@crystalcrop.com</a>	24*7
3.	Post	Compliance Officer B-95, Wazirpur Industrial Area, Delhi - 110052	24*7
4.	The Chairman of the Audit Committee	<a href="mailto:acchairman@crystalcrop.com">acchairman@crystalcrop.com</a>	24*7

# FLOW CHART OF WHISTLEBLOWER SYSTEM



# Where can I find the Whistle Blower Policy?

SEE SOMETHING?  
SAY SOMETHING.  
REPORT IT.

You can find the Whistle Blower Policy uploaded on the Website of the Company, in the Corporate Governance section or click on the link given below:

<https://www.crystalcropprotection.com/assets/pdf/whistle-blower-policy-updated-26.11.2021.pdf>