

Conflict of Interest Policy

<p>Purpose:</p>	<p>We in MSSSPL are committed to conducting business in an ethical manner and in compliance with the applicable legal and regulatory requirements. Even an appearance of a conflict situation can be damaging to the reputation of MSSSPL.</p> <p>MSSSPL recognizes that conflict of interest situations may arise where an employee's personal interests either influence, or have the potential to influence, or are perceived to influence their decision making in the best interests of MSSSPL.</p> <p>This policy is intended to increase the awareness of our employees about the potential for conflicts of commitment and interest, and to establish procedures whereby such conflicts may be prevented or managed or eliminated in a transparent manner.</p>
<p>Scope and Applicability:</p>	<p>This Policy is applicable to all employees whether on payrolls or contractual.</p> <p>This Policy comes into force on 21 January, 2017 and replaces any/ all the previous versions of the Conflict of Interest Policy that exists.</p>
<p>Philosophy:</p>	<p>Conflict of interest situations may arise when an employee places his or her personal interests before the interests of MSSSPL and where such personal interests unduly influence his/her business decisions and/or actions.</p> <p>These situations may also include closely related persons and friends. Conflict of Interest situation may be an actual/ existing one or a potential/ perceived one.</p> <p>We are committed to the highest levels of integrity and all our employees are expected to show high level of objectivity, honesty and transparency in their daily conduct within and outside the organization.</p> <p>All employees are obligated to prevent and disclose ethical, legal, financial, or other conflicts of interest involving MSSSPL at all times.</p> <p>You are expected to excuse yourself from taking decisions that relates to actual or potential Conflict of Interest.</p> <p><i>For more clarity and details please refer to the Procedure document of this policy.</i></p>
<p>Policy Review & Interpretation:</p>	<ul style="list-style-type: none"> • The Apex Committee of MSSSPL, is responsible for the interpretation of the policy and its guidelines as per the defined clauses mentioned in this document and reserves the right to add, delete and modify any clause without prior notice. • This policy will be reviewed every 2 years or earlier, as deemed fit by the Apex Committee • The Apex Committee consists of 5 members - MD, CGO, CFO, CTO, CEO (Rings), COO, CMO and SrVP HR