

HGL Code of Conduct for Board Members

This Code of Conduct is applicable to all Board Members of the Company.

1. To observe and guide the Company in maintaining highest degree of Corporate Governance.
 2. To act in accordance with the highest standard of professional integrity and to act diligently, honestly in the discharge of duties.
 3. To discharge their duties in accordance with their good faith business judgment and in the best interest of the Company and its Shareholders.
 4. To keep informed regarding Company's compliance with relevant laws, rules and regulations.
 5. To maintain confidentiality of the Company's business.
 6. To exercise independent judgement on issues of strategy, performance, policy matters, etc.
 7. To avoid and disclose actual and apparent conflicts of personal interest with the interest of the Company and to disclose all contractual interest, whether directly or indirectly, with the Company.
 8. To inform the Company immediately about emergence of any situation that may disqualify him/her from Directorship.
 9. To observe the "Code of Conduct for dealing in Equity Shares and other securities of the Company" framed under the SEBI (Prohibition of Insider Trading) Regulation, 1992.
 10. To treat women employees equally and eliminate any gender discrimination.
 11. Not to hold any office or place of profit in the Company by himself/herself or by his/her relatives without full disclosure of information in connection therewith.
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HGL Code of Conduct for Senior Management

This Code of Conduct for Senior Management is applicable to all Functional Heads of the Company.

1. To discharge their duties in accordance with their good faith business judgment and in the best interest of the Company and its Shareholders.
2. To maintain and help the Company in maintaining the highest degree of Corporate Governance.
3. To act in accordance with the highest standard of professional integrity and to act diligently, honestly in the discharge of duties.
4. To use reasonable care and skill in the discharge of duties and responsibilities and exercise of powers for the benefit and prosperity of the Company.
5. To have a clear understanding of the aims and objectives and various policies of the Company.
6. To avoid and disclose actual and apparent conflicts of personal interest with the interest of the Company and to disclose all contractual interest, whether directly or indirectly, with the Company.
7. To treat women employees equally and eliminate any gender discrimination.
8. Not to engage in any activity that interferes with the performance or responsibilities to the Company.
9. Except as may be approved by the Board of Directors of the Company not to accept simultaneous employment/ directorship with the suppliers, customers or competitors of the Company and not to take part in any activity that enhances or supports a competitor.
10. To avoid conducting Company business with a relative or with a business in which a relative is associated in any significant role.
11. To give report to the Chairman of the Board of Directors about any illegal or unethical behaviors of any employee and officer.
12. Not to accept any offer, payment, donations, gifts or anything of value from customers, vendors, consultants, etc. that is perceived as intended, directly or indirectly, to influence any business decision.
13. To promote professionalism in the Company.
14. To maintain confidentiality of the Company's business.
15. To ensure at all times, the integrity of data or information furnished by him/her to the Company.

16. To provide information so that Company's public disclosure requirements should be full, fair, accurate, timely and understandable.
17. To ensure protection and efficient use of Company's assets. Company's assets/resources should be used only to conduct Company's business.
18. To observe the "Code of Conduct for dealing in Equity Shares and other securities of the Company" framed under the SEBI (Prohibition of Insider Trading) Regulation, 1992.
19. To promptly report to the Chairman any actual or possible violation of the Code or an event.