



**D.P. Jewellers**

— A BOND OF TRUST SINCE 1940 —

A VENTURE OF D.P. ABHUSHAN LIMITED

# CODE OF ETHICS

**Approving Authority** Board of Directors of the Company  
**Review Cycle** As may be decided by the Board

## Message from Whole-time Director

At D. P. Abhushan Limited, our foundation is built on ethical behaviour and uncompromising integrity. These aren't just words; they're essential to how we operate every day. We believe that conducting business "the right way"—through a strong culture of ethics and compliance—is paramount.

In a competitive market, our ability to thrive long-term hinges on our moral responsibility, both as individuals and as a company. This means every employee must consistently act lawfully, ethically, and always in the best interests of D. P. Abhushan Limited.

This commitment extends beyond delivering well-made, fairly priced, and exceptionally high-quality products and services. It means that ethics and integrity are always at the forefront of our minds. We meticulously source materials only from suppliers with impeccable human rights and compliance records, ensuring our entire supply chain is of the highest integrity. Furthermore, we continuously monitor our operations for full compliance with our Code of Conduct.



**ANIL KATARIA**

## 1. PURPOSE AND SCOPE

This Code of Ethics delineates the fundamental principles and values that govern the conduct of all employees, directors, officers, and associates affiliated with **D. P. Abhushan Limited** (*the “Company”*). The commitment to ethical behavior is an indispensable component of the organization's success, reputation, and the confidence reposed in it by its clientele, partners, and the broader community.

Within the jewelry industry, where authenticity, quality, and trustworthiness hold paramount importance, adherence to these principles transcends mere regulatory compliance; it constitutes a foundational element for long-term sustainability and growth. This Code serves as a comprehensive directive for decision-making and operational execution across all organizational echelons, ensuring that operations are conducted with the utmost standards of integrity, transparency, and accountability in every aspect of the business, encompassing the procurement of raw materials through to final customer interactions. Its design is intended to cultivate an organizational culture wherein ethical considerations consistently underpin every commercial determination.

## 2. OUR CORE VALUES

D. P. Abhushan Limited is based upon the following core values, which collectively form the cornerstone of its corporate culture and inform its daily operations:

- **Integrity:** The organization conducts its affairs with unwavering honesty, impartiality, and robust moral principles across all engagements. This commitment mandates the assurance of authenticity and specified purity for every jewellery item retailed, the maintenance of transparent pricing structures, and the execution of all business interactions with profound sincerity and honesty. The integrity of the organization's commitments is considered inviolable.
- **Respect:** All individuals are treated with inherent dignity, thereby fostering an inclusive and conducive professional environment. This principle extends comprehensively to colleagues, clients, suppliers, and the communities within which the organization operates. Diverse perspectives are highly valued, equitable treatment is rigorously promoted, and open, constructive communication is consistently encouraged.
- **Excellence:** The organization endeavours to achieve the highest possible quality in its products, services, and operational processes. This dedication to excellence is manifestly evident in the meticulous craftsmanship, superior standards of customer service, and the incessant pursuit of process enhancement, ensuring that each piece of our jewellery stands as a testament to unparalleled quality and artistic merit.
- **Accountability:** The organization assumes full responsibility for its actions and their resultant impact, both on an individual and corporate basis. This entails ownership of decisions, fulfilment of commitments, assimilation of lessons from errors, and ensuring that all operational activities contribute positively to societal welfare and environmental preservation.
- **Compliance:** Strict adherence is maintained to all applicable laws, regulations, and internal policies. This commitment guarantees that all business endeavours, from financial reporting protocols to product labelling specifications, consistently meet or exceed legal mandates and industry benchmarks, thereby safeguarding the organization's legal standing and esteemed reputation.
- **Customer Focus:** The needs and satisfaction of the clientele are accorded supreme priority. This necessitates active solicitation of feedback, comprehensive understanding of client desiderata, provision of exceptional service delivery, and the cultivation of enduring

relationships founded upon trust, quality, and mutual esteem. The objective is to facilitate memorable and positive experiences for every customer.

D. P. Abhushan Limited is unequivocally committed to upholding ethical standards in every facet of its enterprise. Adherence to this Code is indispensable for the collective success and integrity of the organization, thereby ensuring its sustained standing as a trusted and respected entity within the jewellery industry.

### **3. ETHICAL DECISION-MAKING**

Ethical conduct is a value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Is what I am doing legal?
- Is this the right thing to do?
- Does it reflect our company values and ethics?
- Does it comply with the Code and company rules/policies?
- Does it respect the rights of others?
- Am I being loyal to my family, my company and myself?
- Have I been asked to misrepresent information or deviate from normal procedure?

### **4. PRINCIPLES OF CONDUCT IN INTERNAL RELATIONS**

#### **4.1 Policies for selecting staff and collaborators**

Our people are essential to D. P. Abhushan Limited's existence and our key to success in the market. We believe that the honesty, loyalty, skills, professionalism, dedication, and expertise of our team are fundamental to achieving our company goals. These are the very qualities we expect from all our Directors, employees, and collaborators, no matter their role.

To foster our company's growth and ensure everyone aligns with our ethical principles and values, D. P. Abhushan Limited's policy is to select every employee, consultant, and collaborator based on values mentioned above. During the selection process, we make sure that new hires genuinely match the needs of the company, always avoiding favouritism or any undue advantages.

#### **4.2 Prevention of conflicts of interest**

At D. P. Abhushan Limited, we expect everyone involved in our business to prioritize the company's success over personal, social, financial, or political interests.

A conflict of interest happens when your personal interests or activities could interfere with your ability to make decisions solely for the benefit of D. P. Abhushan Limited. This also applies if you gain personal advantage from the company's business opportunities. Conflicts of interest not only go against our Ethical Code and the law but can also seriously damage our company's reputation and integrity.

If you believe you might have a conflict of interest, it's crucial to inform your superior or the Human Resources Manager immediately. The company will then assess the situation and determine if a

conflict truly exists. In such cases, you are expected to abide by the company's decision.

#### **4.3 Employees' and collaborators' duties**

Employees and collaborators must act with loyalty, fulfilling their contractual obligations and adhering to this Code. This includes diligent efforts to protect company assets, following all operational procedures. Everyone is responsible for safeguarding the material and financial resources entrusted to them and must report any risks or harmful events. Additionally, all staff must comply with information security policies to ensure data integrity, confidentiality, and availability, and create clear, objective, and comprehensive documentation for internal and external review.

#### **4.4 Use of corporate resources**

Everyone at D. P. Abhushan Limited is responsible for protecting and preserving the company's resources and using them properly for business purposes, following all company procedures.

Specifically, you must:

- **Use company resources diligently.**
- **Avoid improper use** that could lead to illegal actions, damage, inefficiency, or go against the company's best interests.
- **Strictly follow company procedures and laws** regarding resource use, especially for software and intellectual property.
- **Use resources securely, respectfully, and with decorum**, considering others' sensibilities.

#### **4.5. Dedication to Company Duties**

During your employment with the Company, you are expected to devote your full time, attention, and professional skill to the business and interests of the Company. You must not, whether directly or indirectly, engage in, be associated with, or undertake any other business, employment, part-time work, or academic course without obtaining prior written approval from the Company.

#### **4.6 Confidentiality Obligations**

You are required to maintain the highest standards of confidentiality with respect to all proprietary and confidential information that you may have access to during the course of your employment. Such information must be used solely for authorized business purposes and in the best interests of the Company.

For the purposes of this clause, “**Confidential Information**” includes, but is not limited to, any non-public information relating to:

- The Company's business operations, strategies, and financial data;
- Customer lists, supplier details, and business relationships;
- Personnel information and employment policies;
- Products, processes, technologies, designs, drawings, specifications, manuals, ideas, concepts, projections, and other intellectual property; and
- Any records, documents, or materials containing or reflecting such information.

#### **4.7 Protection of Company Information**

You must not remove, copy, or transmit any Confidential Information from the Company's premises or systems without prior authorization.

#### **4.8 Continuing Obligation**

Your duty to protect and refrain from disclosing Confidential Information continues beyond the termination or expiration of your employment with the Company.

#### **4.9 Consequences of Breach**

Any breach of this policy or misuse of Confidential Information will be treated as a serious violation of Company policy and may result in summary dismissal, in addition to any other legal remedies available to the Company.

The company strictly forbids using resources in any way that violates current laws or offends anyone's liberty, integrity, or dignity, especially minors. We also prohibit any use that could unjustly intrude on or damage others' IT systems.

### **5. PRINCIPLES OF CONDUCT IN EXTERNAL RELATIONS**

#### **5.1 Relations with customers**

We believe in delivering top-quality services to our customers. This means every employee and partner must act with integrity, courtesy, and helpfulness. We're committed to providing clear, comprehensive, and accurate information whenever needed, and we'll never use misleading or deceptive practices that could compromise our customers' ability to make independent decisions.

#### **5.2 Relations with suppliers**

At D. P. Abhushan Limited, we believe in complete transparency when working with our suppliers. We follow all laws, regulations, and our own internal procedures for purchasing and selecting suppliers.

It's our firm policy to engage with all potential suppliers fairly and openly. We steer clear of any negotiations that might seem biased, and we never let favoritism or the promise of personal gain influence our decisions. Our focus is always on what's best for the company and maintaining the integrity of our supplier relationships.

#### **5.3 Relations with Public Authorities**

D. P. Abhushan Limited strictly follows all regulations when dealing with public administrations or entities serving public interests.

We prohibit:

- Offering jobs, favors, gifts (beyond small courtesies), or any other benefits to public officials, their families, or associates.
- Improperly influencing their decisions.
- Creating advantages for them through deceptive practices.

When involved in legal proceedings, D. P. Abhushan Limited, its employees, and consultants will never act in a way that seeks unlawful advantage. We fully cooperate with judicial authorities, providing truthful statements and avoiding any form of reticence or falsehood. Our company is committed to acting in full compliance with the law.

#### **5.4 Gifts, benefits and promises of favours**

D. P. Abhushan Limited forbids all those operating in its interests, in its name or on its behalf, to offer or promise, even indirectly, money, gifts, goods, services or favours that are not due (even in terms of employment opportunities) and which are extraneous to normal relations of courtesy between the parties.

#### **5.5 Protection of the environment**

At D. P. Abhushan Limited, we see the environment as a primary asset that we're dedicated to protecting. We strive to balance our business goals with environmental needs, ensuring our operations meet current environmental regulations and consider the rights of future generations. We're committed to minimizing our environmental impact by using processes, technologies, and materials that prevent or limit pollution from our activities.

Everyone at D. P. Abhushan Limited is expected to thoroughly evaluate and prevent environmental issues, actively working to correct any harmful environmental situations or conduct. We also make sure all staff are involved in learning about and promoting environmental awareness in the workplace.

### **6. ANTI-BRIBERY AND ANTI-CORRUPTION**

D. P. Abhushan Limited is unequivocally committed to conduct all business activities with the highest standards of integrity and in full compliance with all applicable anti-bribery and anti-corruption laws, including but not limited to the Prevention of Corruption Act, 1988 (India), and other relevant international regulations. Bribery and corruption, in any form, are strictly prohibited. This includes offering, giving, soliciting, or accepting any undue financial or other advantage, directly or indirectly, to or from any person or entity, whether private or public, for the purpose of influencing actions or decisions.

All employees, directors, officers, and third parties acting on behalf of D. P. Abhushan Limited must never engage in any form of bribery, kickbacks, illicit payments, or any other corrupt practices. Any suspected violation of this policy must be immediately reported through the designated channels, and appropriate disciplinary action, up to and including termination of employment or contracts, and legal action, will be taken. Our commitment to ethical conduct is non-negotiable and fundamental to our business values.

### **7. WAIVERS AND AMENDMENTS TO THE CODE**

D. P. Abhushan Limited is committed to continuously review and update its policies and procedures; therefore, this Code is subject to modification.

### **8. DISCLOSURE**

The Code is available on the website of the Company at <https://www.dpjewellers.com/>.

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