

SURVIVAL TECHNOLOGIES LIMITED
(Formerly known as Survival Technologies Private Limited)

CODE OF CONDUCT
FOR
DIRECTORS AND SENIOR MANAGEMENT

Approved by the Board of Directors on December 15, 2022

**SURVIVAL TECHNOLOGIES LIMITED
CODE OF CONDUCT
FOR
DIRECTORS AND SENIOR MANAGEMENT**

Introduction

Trust, integrity, transparency and professional service form part of the core beliefs of all activities at **Survival Technologies Limited ('the Company')**, which has been the basis of its growth and development.

In terms of the Regulation 17(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), the Company has formulated and adopted a Code of Conduct for its Directors, Senior Management, duly approved by its Board of Directors ('**the Board**').

Further, Regulation 46(2)(d) of SEBI Listing Regulations requires every Listed Company to publish a code of conduct for its Board of Directors and Senior Management Personnel on its website.

Effective Date

This Policy shall be effective from the date of listing of the securities of the Company on the stock exchange(s).

Applicability

This Code shall be applicable to the following persons:

- a) Whole-time Directors including the Executive Chairman/ Vice Chairman of the Company.
- b) All Non-Executive Directors including Independent Directors unless specifically exempted from some provisions of this Code.
- c) All Employees in the category of Senior Management Personnel of Company

Key Requirements

The Board of Directors (the "Board") and the senior management of Survival Technologies Limited ("the Company") affirm compliance of Code of Conduct adopted by the Board in terms of Regulation 26 (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

They would

1. use **due care and diligence in performing their duties** of office and in exercising their powers attached to that office;
2. **Act honestly and use their powers of office, in good faith and in the best interests** of the Company as a whole;
3. Not make **improper use of information nor take improper advantage of their position**;
4. Not allow **personal interests** to conflict with the interests of the Company;

5. Recognize that their **primary responsibility** is to the Company shareholders as a whole but they should (where appropriate) have regard for the interests of all stakeholders of the Company;
6. Not engage in **conduct likely to bring discredit** upon the Company; and
7. Be **independent in judgment** and actions, and to take all reasonable steps to be satisfied as to the soundness of all decisions taken by the Board;
8. ensure the **confidentiality of information** they receive whilst being in office of Director and is only disclosed if authorized by the company, or the person from whom the information is provided, or as required by law;
9. avoid having any personal financial interests in works or contracts awarded by the Company.
10. immediately bring to the notice of the Board about any unethical behaviour, suspected fraud, or violation of the Company's policies.
11. comply with all applicable laws, rules and regulations and any violation thereon may make them personally liable. Directors and Senior Management Personnel may be subjected to disciplinary action by the Company for violation of provisions of law.
12. ensure compliance with SEBI (Prohibition of Insider Trading Regulations), 2015 as amended from time to time
13. not derive benefit or assist others to derive benefit by giving investment advice from the access to and possession of information about the Company, not in public domain and therefore constitute insider information. The Directors and the Senior Management Personnel shall make timely disclosures of:
 - a) trading in the shares of the Company,
 - b) transactions having personal interest and
 - c) related party transactions that are required to be made under laws, rules and regulations and Code of Conduct / Internal Procedure for prevention of Insider Trading in the Securities of Company
14. affirm compliance with this Code on an annual basis.

Duties of Independent Directors

Regulation 17(5)(b) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates that the Company should incorporate the Duties of Independent Directors as prescribed in the Companies Act, 2013 in the Code of Conduct adopted for the directors and senior management of the Company.

The independent directors shall -

1. Undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company;
2. Seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the company;
3. Strive to attend all meetings of the Board of Directors and of the Board committees of which he is a member;
4. Participate constructively and actively in the committees of the Board in which they are chairpersons or members;
5. Strive to attend the general meetings of the company;
6. Where they have concerns about the running of the company or a proposed action, ensure that these are addressed by the Board and, to the extent that they are not resolved, insist that their concerns are recorded in the minutes of the Board meeting;
7. Keep themselves well informed about the company and the external environment in which it operates;
8. Not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board.
9. Pay sufficient attention and ensure that adequate deliberations are held before approving related party transactions and assure themselves that the same are in the interest of the company;
10. Ascertain and ensure that the company has an adequate and functional vigil mechanism and to ensure that the interests of a person who uses such mechanism are not prejudicially affected on account of such use;
11. Report concerns about unethical behavior, actual or suspected fraud or violation of the company's code of conduct or ethics policy;
12. Acting within their authority, assist in protecting the legitimate interests of the company, shareholders and its employees;
13. Not disclose confidential information including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board or required by law.

DECLARATION

All Board Members and the Senior Management shall on an annual basis, affirm compliance in with this Code in the format attached and the Managing Director or the Whole Time Director shall in turn declare the compliance of the same in the Annual Report.

ANNUAL CERTIFICATION

(For Directors and members of Senior Management)

I, _____, hereby certify and acknowledge that:

1. I am a member in good standing of the Board of Directors / Senior Management of **SURVIVAL TECHNOLOGIES LIMITED;**
2. I have received, read and understood THE COMPANY'S CODE OF CONDUCT FOR DIRECTORS AND SENIOR MANAGEMENT;
3. Such code has been and is applicable to my activities as member of such Board of Directors / Senior Management;
4. I agree to comply with THE COMPANY'S CODE OF CONDUCT FOR DIRECTORS AND SENIOR MANAGEMENT;
5. I am neither aware of nor I am a party to any non-compliance with the said Code.

Date:

Signed:
Name: