


<b>Name of the Policy</b>	<b>CODE OF CONDUCT POLICY</b>		
<b>Policy No.</b>	RPPL /HR/POL/05		
<b>Applicable to</b>	ALL PERMANENT EMPLOYEES	<b>Effective date</b>	1 <sup>st</sup> July'23
<b>Approved by</b>	HUMAN RESOURCE DEPARTMENT	<b>CFO</b>	<b>CEO</b>
<b>Signatures</b>	<i>Shabnam</i>	<i>[Signature]</i>	<i>Nitin Baul</i>

## 1. Introduction

Radiant strives to be the preferred provider of cutting-edge plastic technology solutions with 30+ years of experience, serving multiple Fortune 500 clients in the Automotive, Lighting, and industrial segments. Our commitment to excellence includes a commitment to a high standard of ethics in our business dealings. We have adopted this Code of Business Conduct and Ethics to guide us in recognizing and dealing with ethical issues and helping us maintain a culture of integrity and accountability.

## 2. Scope

- 2.1 This policy applies to Radiant, including all of its plant locations, affiliates, partnerships, ventures, and other business associations that are effectively controlled by the company. All company directors, on-roll employees, and consultants are subject to this policy.
- 2.2 The standards and procedures outlined in the Code are designed to deter wrongdoing and promote (i) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (ii) full, fair, accurate, timely and understandable disclosure in the report and documents that the Company submits to governmental agencies and in other public communications; (iii) compliance with applicable governmental laws, rules and regulations; (iv) prompt internal reporting of violations of the Code; and (v) accountability for adherence to the Code.


## 3. Compliance with the Laws

The business of our company is to be conducted by all employees strictly by applicable laws, rules, and regulations. This code refers specifically in places to certain laws, but we are all expected to observe all laws governing our conduct and to contact the Human Resources Department if there is any question concerning whether any conduct involving the Company is lawful.

## 4. Compliance with the code

It is the responsibility of all of us to read carefully and understand this Code. If you are concerned about an ethical situation or are not sure whether specific conduct meets the Company's standards of conduct, you are responsible for asking your supervisors, Human Resources representatives, or other appropriate Company representatives any questions you believe are necessary to understand the Company's expectations.

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## 5. Violation of the code

Those of us who fail to comply with the Code, including supervisors who fail to report wrongdoing, may be subject to disciplinary action, including employment termination.

The following are examples of conduct that may result in discipline:

- actions that violate the Code
- requesting others to violate the Code;
- failure to promptly raise a known or suspected violation of the Code;
- failure to cooperate in investigations of possible violations of the Code
- retaliation against another employee for reporting a possible violation of the Code.

## 6. Reporting Violations; Confidentiality

Radiant has established the following procedures for reporting a violation of the Code or obtaining assistance in connection with a potential issue. If you believe you may have violated this Code, or if you have a good faith belief or proof that another employee has violated this kind, you should immediately report the violation to your supervisor or a representative of our Human Resources group. Supervisors who have received such a report from an employee should promptly report the matter to Human Resources.

In addition, we have an Executive Committee. These Executive Committee Officers offer another venue for you to report or discuss possible violations of the Code. The current members of the Executive Committee, and how they can be reached, shall be identified on an ongoing basis in Annexure A to the Code.


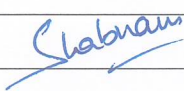
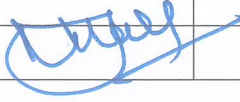

All reports and inquiries will be handled confidentially to the greatest extent possible under the circumstances. Employees may choose to remain anonymous, though in some cases that could make it more difficult to follow up and ensure the resolution of their inquiry. As mentioned above, no employee will be subject to retaliation or punishment for reporting in good faith suspected unethical or illegal conduct by another employee as provided in this Code or for coming forward to alert us of any questionable situation.

## 7. Retaliation

Radiant will not tolerate retaliation against anyone who in good faith raises a concern, reports misconduct, or participates in an investigation

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Radiant prohibits taking negative action against any colleague or associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee or associate who retaliates against another employee or associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

## 8. Business conduct and practices


### Financial and Business Records

- 8.1 Those of us involved in the preparation of Radiant's financial statements must prepare those statements according to applicable accounting principles and standards so that the financial statements materially, fairly, and completely reflect the business transactions and financial condition of the Company. Company policy prohibits any employee from knowingly making or causing others to make a misleading, incomplete, or false statement in connection with an audit or any filing with any governmental or regulatory entity.
- 8.2 Our policy also prohibits any employee from falsifying or causing others to falsify any company record or documentation. In addition, an employee must not omit or cause others to omit any material information that is necessary to prevent a statement made in connection with any audit, filing, or examination of the Company's financial statements from being misleading. Employees are prohibited from maintaining any undisclosed or unrecorded corporate account, funding, or assisting in any arrangement, including off-balance-sheet items or arrangements, with a misleading purpose.
- 8.3 Destruction or falsification of any document that is potentially relevant to a violation of law or a government investigation may lead to prosecution for obstruction of justice. Therefore, if an employee has reason to believe that a violation of the law has been committed or that a government, criminal, or regulatory investigation is about to be commenced, he or she must retain all records (including computer records) that are or could be relevant to an investigation of the matter, whether conducted by the Company or by a governmental authority. Questions about the destruction or retention of documents in this context should be directed to the Radiant Human Resources Department.

## 9. Company Property

All employees should protect Radiant's assets and ensure their efficient use. None of us are permitted to take, borrow, or knowingly misappropriate the assets of Radiant, including any proprietary or confidential information of the Company, for our use, the use of another, or for an improper or illegal purpose. We are not permitted to remove, destroy, or dispose of anything of value belonging to Radiant without the company's consent.

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## 10. Frauds and Thefts

- 10.1 Radiant policy prohibits fraudulent activity and establishes procedures to be followed to ensure that incidents of fraud and theft relating to us are promptly investigated, reported, and, where appropriate, prosecuted. Fraudulent activity can include actions committed by an employee that wrongfully injures suppliers and customers, as well as those that injure Radiant or any of our employees.
- 10.2 Employees who suspect that fraudulent activity or theft involving Radiant Polymers has occurred must immediately report such concern by this policy, as provided in the section entitled Reporting Violations; Confidentiality. No employee or agent may sign a criminal complaint on behalf of Radiant without the prior written approval of the Human Resources Department.

## 11. Confidential Information

It is the responsibility of all of us to protect the non-public information of Radiant, including its strategies or plans, financial condition, technology, processes, systems, products, employees' personal protected information, customers, suppliers, competitors, marketing or sales activities, pricing, prospective acquisitions or divestitures, or other aspects of its business strategies or plans ("Confidential Information"). Employees should not disclose to any third parties or use any Confidential Information for any purpose other than on a "need to know" basis within the Company. If an employee believes it is appropriate or required by law to disclose or use Confidential Information outside the Company, the Human Resources Department must be contacted before the disclosure or use so that appropriate protective measures may be considered. If the Company has executed a confidentiality agreement with a third party regarding confidential information to be disclosed by the third party to the Company, all employees receiving such confidential information must honor the terms of such agreement. These obligations last during the entire term of one's employment with the Company and at all times thereafter.

## 12. Information Security



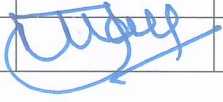
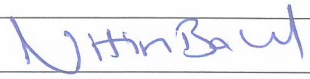
Protecting the confidentiality, integrity, and availability of company information and the sensitive data of our partners and stakeholders is paramount. Employees are entrusted to safeguard this information through adherence to cyber security protocols, secure data handling practices, and strict avoidance of unauthorized disclosure. Robust information security is essential to our business and demonstrates respect for those with whom we share data.

## 13. Conflict of Interest

- 13.1 A "conflict of interest" occurs when an individual's private interest in any way interferes – or appears to interfere with the interests of Radiant. A conflict situation can arise when an employee takes action or has interests that may make it difficult to perform his or her work on behalf of Radiant objectively

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and effectively. Conflicts of interest also arise when an employee or member of his or her family receives improper personal benefits as a result of his or her position at Radiant.

13.2 Employees' business decisions and actions must be based on the best interests of Radiant. Relationships of employees or their family members with prospective or existing suppliers, customers, competitors, or others involved in the business of Radiant must not affect an employee's independent and sound judgment. Employees should not, directly or indirectly, have outside interests that conflict or appear to conflict with the best interests of Radiant unless previously disclosed to the Company and approved. In the case of directors or the Chief Executive Officer, such disclosures should be made to the Governance Committee of the Board of Directors. Other employees should disclose such matters to the Executive Committee.

#### 14. Loans and Guarantees

Directors, officers, and other employees may not seek or accept loans or guarantees of obligations from the Company for themselves or their family members. Furthermore, employees may not seek or accept loans or guarantees of obligations (except banks), for themselves or their family members, from any individual, organization, or business entity doing (or seeking to do) business with Radiant. Employees must report to their supervisor promptly all offers of the above type, even when refused.

#### 15. Money Laundering

Radiant complies with all applicable laws and regulations regarding anti-money laundering measures. Employees are prohibited from involvement in any transactions that are designed to disguise or conceal the illicit origins of funds or assets.


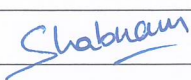
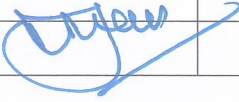

#### 16. Anti-Competitive Practices

Radiant is committed to fair competition. Employees must not engage in price-fixing, bid-rigging, market allocation, or any other forms of collusion with competitors. Adherence to antitrust and competition laws is mandatory to ensure a fair and transparent marketplace.

#### 17. Ownership in Other Businesses

Employees may not own, directly or indirectly, a significant financial interest in any business entity that does or seeks to do business with, or competes with, Radiant unless specific written approval has been granted in advance by the Executive Committee. As a guide, "a significant financial interest" is defined as ownership by an employee and/or family members of more than 1% of the outstanding equity of a

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business entity or that represents more than 5% of the total assets of the employee and/or family members.

### 18. Corporate Opportunities

Employees may not take for themselves opportunities that are discovered through the use of Company property, information, or position, nor may they use Company property, information, or position for personal gain. Furthermore, employees should not compete with the Company unless such competition is disclosed to the Executive Committee.

### 19. Outside Employment, Affiliations, or Activities

An employee's primary employment obligation is to Radiant. Any non-company-related outside activity, such as a second job or self-employment, must be kept separate from activities with Radiant. Employees may not use Radiant customers, suppliers, time, name, influence, assets, facilities, materials, or services of other employees for outside activities unless specifically authorized by us, including in connection with charitable or other volunteer work.

### 20. Gifts, Gratuities, and Entertainment


20.1 Employees and their family members should not accept gifts, gratuities, or entertainment from persons, firms, or corporations with whom Radiant does or might do business other than those of modest value, consistent with generally accepted ethical business practices. Our policy is not to offer gifts, gratuities, or entertainment to persons, firms, or corporations with whom we do or might do business other than those of modest value, consistent with generally accepted ethical business practices.

20.2 There are some cases where refusal of a valuable gift would be offensive to the person offering it. This is particularly true when employees are guests in another country, and the gift is offered as part of a public occasion. In these cases, the employee to whom the gift was offered may accept the gift on behalf of Radiant, report it to a supervisor, and turn it over to us.

20.3 Radiant, as a responsible corporate citizen, can make donations of money or products to worthy causes, including fundraising campaigns conducted by its customers. The contribution should not be connected to any specific customer purchases or purchasing commitments to remain an appropriate donation.  
***If you are unsure, contact the Human Resources Department.***

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## 21. Relationships with Suppliers or Service Providers

Radiant encourages good supplier relations. However, you may not benefit personally, whether directly or indirectly, from any purchase of goods or services for or from Radiant Employees whose responsibilities include purchasing or who have contact with suppliers or service providers, must not exploit their position for personal gain.

Under no circumstances may any employee receive cash or cash equivalents from any supplier, whether directly or indirectly.

## 22. Insider trading

Insider trading is both illegal and unethical. Federal and state securities laws and Radiant policy prohibit the buying or selling of securities based on material, non-public information. All of us, at any level, who are aware of non-public material information related to Radiant or any other businesses, may not, directly or indirectly, use such material non-public information in purchasing or selling any securities of Radiant. We are all prohibited from purchasing or selling securities when we possess material, non-public information and may not have any other person purchase or sell such securities on our behalf. Material non-public information may not be disclosed to any person outside Radiant (including relatives, friends, or business associates regardless of the purpose for which such disclosure may be made) until authorized Radiant officials have adequately disclosed the information to the public. For any questions regarding these topics, please consult with the Human Resources Department.

Material information” is any information that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities. Examples may include acquisitions, divestitures, joint ventures, changes in key management, large contracts, material contract cancellations, new products or processes, earnings figures and trends, and important information on litigation. Please consult the Human Resources Department for any questions regarding the materiality of certain information.


Each employee is expected to comply with applicable securities laws. Ignorance of the law is not a defense.

## 23. Antitrust and Unfair Competition

### 21.1 Antitrust:

It is Radiant’ policy to comply fully with the antitrust laws that apply to our operations domestically and throughout the world. Antitrust and competition laws are very complex and vary from country to

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country. The general principles set forth below are intended to help employees recognize situations that raise potential antitrust or competition issues so that they can then consult the Human Resources Department.

In general, Radiant may not agree with any competitor:

- concerning what prices the Company and the competitor will charge a customer or customers, or about other terms (e.g., credit) or conditions of sale;
- allocating markets, product lines, customers, or territories (e.g., agreeing on who may sell to certain customers or in certain territories); or
- to refuse to deal with a certain supplier or customer

Employees should not participate in conversations or meetings with competitors on the above subjects and should contact Human Resources if approached to do so. It is our policy that all customers and suppliers be treated fairly and not discriminated against.

### 21.2 Unfair Competition:

Federal and State laws prohibit unfair methods of competition and unfair or deceptive acts and practices. These laws, like antitrust laws, are designed to protect competitors and customers. While it is impossible to list all types of prohibited conduct, some examples include;

- Commercial bribery or payoffs to induce business or breaches of contracts by others;
- Acquiring competitor's trade secrets through bribery or theft;
- Making false, deceptive, or disparaging claims or comparisons regarding competitors or their products; and
- Making claims concerning one's products without a reasonable basis for doing so.


All public statements on behalf of Radiant, including in connection with advertising, promotional materials, sales presentations, warranties, and guarantees, should always be truthful and have a reasonable basis in fact and should not be misleading in any way.

### 24. Equal Employment Opportunity

Radiant is committed to providing equal opportunity in all aspects of employment and a work environment free of unlawful discrimination or harassment of any kind. Employees are responsible for understanding and complying with the Company's policies on equal employment opportunity and

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unlawful harassment. Copies of these policies can be obtained from the Company's Human Resources department.

### 25. Protecting the environment and maintaining a safe workplace

Radiant is committed to complying with applicable laws and acting responsibly and effectively in protecting the environment and maintaining a safe workplace. Employees are responsible for understanding and complying with our environmental, health, and safety policies. Copies of these policies can be obtained from our Health, Safety, and Environment department.

### 26. Social Media

Radiant understands that social media can be a fun and rewarding way to share your life with family, friends, and co-workers around the world. However, the use of social media can present certain risks and carries with it certain responsibilities. We have established specific guidelines regarding the appropriate use of social media. These guidelines apply to everyone who works at Radiant.


Social media includes all means of communicating or posting information or content of any kind on the Internet, including to your own or someone else's website or blog, journal or diary, personal website, social networking or affinity website, web bulletin board, or a chat room, whether it is associated with Radiant or not, as well as any other forms of electronic communication.

As you are solely responsible for what you post online, before creating content consider some of the risks and rewards that are involved. Keep in mind that any conduct that adversely affects your job performance, the performance of colleagues, employees of Radiant, customers, and suppliers may result in disciplinary action up to and including termination.

### 27. Waiver/Modifications

In certain limited situations, Radiant may waive the application of the Code to employees, officers, or directors. Concerning executive officers and directors, any such waiver requires the express approval of the CEO. Concerning all other employees, any such waiver requires the express approval of the Executive Committee.

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**ANNEXURE A**  
**Executive Committee Members**

Names and contact information for current Committee Members can be obtained from the local Human Resource Manager.

S.No.	Name	Designation	Department	Contact Details
1.	Mr.HM Gupta	Chairperson	Operations	Mobile No.- 99109 93663
2.	Mr.Yash Garg	Chief Compliance Officer	Finance	Mobile No.-9258820122
3.	Mr.Jitender Mullick	Member	Finance	Mobile No.- 98106 65374
4.	Ms.Shabnam Sahu	Member	HR	Mobile No.-7905288338
5.	Mr.Ajeet Singh	Member	MR	Mobile No.-85888 71149

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