Glittek Granites Limited

CODE OF CONDUCT FOR BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL

Regulation 17(5) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

CODE OF CONDUCT FOR BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL

1. INTRODUCTION

Regulation 17(5) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI Listing Regulations**"), stipulates that every listed company shall lay down a code of conduct for all members of the Board and Senior Management personnel of the Company, which shall be posted on the website of the Company.

Accordingly, this code of conduct has been formulated for laying down the principles and standards that should govern the actions of Glittek Granites Limited ("**Company**"), its associates, directors and employees and requires them to observe highest standards of business and personal ethics in the conduct of their affairs, duties and responsibilities ("**Code of Conduct**"). This Code of Conduct shall also be applicable to all members of the board of directors of the Company and the personnel of the Company who are members of its core management team comprising of all members of management one level below the chief executive officer / managing director / whole time director / manager and shall specifically include functional heads, by whatever name called and the persons identified and designated as key managerial personnel, other than board of directors, by the Company and is in alignment with the Company's vision and values and aims at enhancing ethical and transparent processes in managing the affairs of the Company. The Board and Senior Management are expected to familiarize themselves with this Code of Conduct, and understand, adhere to, comply with and uphold the provisions of this Code of Conduct in their day-to-day functioning.

2. DEFINITIONS

For the purpose of this Policy the following terms shall have the meanings assigned to them hereunder:

(a) "**Board**" means the board of directors of the Company;
(b) "**Committee**" means the nomination and remuneration committee of the Board;
(c) "**Company**" means Glittek Granites Limited.
(d) "**Companies Act**" means the Companies Act, 2013, read with the rules thereunder, as amended;
(e) "**Director**" means a director appointed by the Company on the Board; and
(f) "**Key Managerial Personnel**" means person as defined in section 2(51) of the Companies Act, 2013, as amended from time to time.
(g) "**Senior Management**" means officers/personnel of the Company who are members of its core management team excluding Board of Directors comprising all members of management one level below the Chief Executive Officer or Managing Director or Whole time Director or Manager (including Chief Executive Officer and Manager, in case they are not part of the Board of Directors), and specifically include the functional heads, by whatever name called and the persons identified and designated as key managerial personnel, other than the board of directors, by the Company.

Words and expressions used and not defined in this Policy shall have the meaning ascribed to them in the SEBI Listing Regulations, the Securities and Exchange Board of India Act, 1992, as

amended, the Securities Contracts (Regulation) Act, 1956, as amended, the Depositories Act, 1996, as amended, or the Companies Act and rules and regulations made thereunder.

3. APPLICABILITY

All Directors/Senior Management personnel are expected to comply with the code in its letter and spirit. They are also required to affirm compliance on an annual basis. The annual report of the Company shall contain a declaration to this effect signed by the Managing Director / Chief Executive Officer of the Company.

The Company appoints the company secretary as a compliance officer for the purposes of this code, who will be available to Directors/Senior Management personnel to answer questions and to help them comply with the code.

With a view to maintain high standards that the Company requires, the following rules/code of conduct should be observed in all activities in respect of the Company.

4. ACCOUNTABILITY

The Directors/Senior Management personnel shall discharge their duties in good faith and integrity in business judgment and in the best interests of the Company and its stakeholders. They are expected to use their best endeavors and organize the resources for advancing the Company's mission. They are expected to act ethically, honestly, diligently and in good faith to protect the Company's brand equity and image. They shall act in good faith, responsibly, with due care, competence and diligence, without allowing their independent judgment to be subordinated. They shall act in the best interests of the Company and fulfill their fiduciary obligations.

5. CONFLICT OF INTEREST

Directors/Senior Management personnel shall not engage in any business, relationship or activity, which may be in conflict with the interests of the Company. Conflicts can arise in many situations. It may not be possible to list out every possible conflict at all times and it will not be easy to distinguish between proper and improper activity. Nevertheless, some of the common circumstances that may lead to a conflict of interest, actual or potential set forth below:

a) They should not engage in any activity/employment that interferes with the performance or responsibility to the Company or otherwise in conflict with or prejudicial to the Company.

b) They and their immediate families should not solely for the sake of making profit invest in a Company, customer, supplier, developer or competitor and generally refrain from investments that compromise their responsibility to the Company.

c) They should generally avoid conducting company business with a relative or with a firm/company in which a relative/related party is associated in any significant role.

If such related party transaction is unavoidable, it must be fully disclosed to the Board/ Company Secretary & Compliance officer for approval.

6. COMPLIANCE

All senior management personnel shall ensure compliance of all applicable laws, rules and regulations in its letter and spirit. It is the responsibility of all functional heads to submit compliance of all applicable laws, rules and regulations to the Company Secretary on quarterly basis. In order to assist the Company in promoting lawful and ethical behavior, any possible violation of laws, rules, regulations or the code of conduct shall be reported to the Board of Directors through the Company Secretary.

7. OTHER DIRECTORSHIPS

The Directors must disclose their Directorship, Committee membership on the Board of other companies and substantial shareholding in other companies to the Board on an annual basis. It is felt that service on the Board of a direct competitor is not in the interest of the company.

8. CONFIDENTIALITY OF INFORMATION

Any information concerning the company's business, its customers, suppliers, etc., which is not in the public domain and to which the Directors/Senior Management personnel have access or possesses such information, must be considered confidential and held in confidence, unless such disclosure is required under any law. No Director/ Senior Management personnel shall provide any confidential information either formally or informally, to the press or any other publicity media, unless specially authorized by the Board.

Examples of confidential information include but are not restricted to:

a) Information not yet released to the public;
b) Unpublished company strategy/ price sensitive information;
c) Current or future technical collaborations, breakthroughs and/or inventions;
d) Investments, planned mergers or acquisitions;
e) Information received from customers or partners;
f) Unpublished financial data either actual or forecasted;
g) Employee information;
h) Such other information as Board may declare as confidential information.

9. INSIDER TRADING

A Director / Senior Management personnel shall 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 constituting insider information. All Directors/Senior Management personnel shall comply with SEBI (Prohibition of Insider Trading) Regulations, 2015 and Insider Trading Policy of the Company.

10. EQUITY & AND FAIR JUSTICE

The Directors and senior managers shall maintain equity and fair justice while dealing on behalf of the Company and provide a work environment free from unlawful discrimination, harassment and intimidations of any nature to all employees of the Company. Any kind of harassment and discrimination based on gender, religion, age, sex, national origin and other such characteristics shall be strictly prohibited.

11. CUSTOMER FOCUS

The Directors/Senior Management personnel shall focus on customer satisfaction, which shall be the basic motto of the Company's business. They shall ensure that the communications given are accurate and truthful and do not deliberately omit important facts or shall not be of misleading innature.

12. TEAMWORK AND SPIRIT

The principles of mutual trust, teamwork and spirit shall be appreciated and maintained. Best efforts shall be made to contribute to an environment that builds confidence and empowers people through personal and professional growth. They shall attempt that the teams grow together through collaborative working, skills development, knowledge sharing and learning from each other. Employees being invaluable assets shall be motivated to achieve higher goals.

13. CORPORATE OPPORTUNITY

Except as approved by the Board, the Directors/Senior Management personnel are prohibited from:

a) taking any personal opportunities directly or indirectly that belong to the Company;
b) using the Company's property, information or position for personal gain/ advantage or to cause detriment to the Company; and
c) competing with the Company.

14. GIFT & DONATIONS

No Director/Senior Management personnel of the Company shall receive or offer, directly or indirectly, any gifts, donations, remuneration, hospitality, illegal payments and comparable benefits which are intended to obtain business favors/ personal gains.

15. SAFEGUARDING COMPANY'S ASSETS

The use of Company's Assets for illegal or non-ethical business purposes shall be strictly prohibited. Protecting the Company's assets regardless of whether the same is tangible or intangible is the responsibility of each Director/Senior Management person.

16. FINANCIAL RECORD KEEPING & REPORTING

Company is required to comply with strict accounting principles and regulations. It is critical to ensure that all transactions are properly identified, analyzed and recorded regardless of whether a Director/Senior Management personnel involved directly/ indirectly in any financial/ accounting transactions. All reasonable efforts are expected to ensure that all business records and reports are accurate, complete and reliable.

17. DUTIES OF INDEPENDENT DIRECTORS

The independent directors shall exercise the following duties as given in Schedule IV of the Companies Act, 2013:

a) undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company;
b) 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;
c) strive to attend all meetings of the Board of Directors and of the Board committees of which he is a member;
d) participate constructively and actively in the committees of the Board in which they are chairpersons or members;
e) strive to attend the general meetings of the company;
f) 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;
g) keep themselves well informed about the company and the external environment in which it operates;
h) not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board;
i) 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;
j) 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;
k) report concerns about unethical behavior, actual or suspected fraud or violation of the company's code of conduct or ethics policy;
l) act within their authority, assist in protecting the legitimate interests of the company, shareholders and its employees;
m) 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.

18. AUTHORIZATIONS

Every Director/ Senior Management/ Functional Heads shall have proper authorisation/ delegation of power from Board / any officer authorised by the Board to sign any document, paper, deed, contract on behalf of the Company or which requires

authentication by the company, unless otherwise permitted by any law for the time being force. Every such requirement will be duly forwarded to Company Secretary & Compliance officer at least fourteen days before the due date of signing such document. It is the responsibility of all Senior Management/ functional heads to ensure compliance of this provision in its letter and spirit.

19. COMPLIANCE WITH RULES AND REGULATIONS AND POLICIES ISSUED BY THE COMPANY

The Directors, Key Managerial Personnel and Senior Management of the Company shall comply with all rules, regulations and policies issued by the Company.

20. COMPLIANCE WITH THIS CODE

Once in every year, every Director and Senior Management personnel must acknowledge a confirmation that he/she has complied with the Code.

21. APPLICABILITY

This code will be applicable to Company and all its material subsidiaries.

22. AMENDMENT

This code may be amended, modified or varied by the Board as may be deemed necessary in the interests of the Company and subject to the provisions of applicable laws, regulations or guidelines.

23. EFFECTIVE DATE

This code shall be effective from November 1, 2026.

ACKNOWLEDGEMENT FORM – CODE OF CONDUCT

To
Board of directors
Glittek Granites Limited.
[Registered office address]

As a Director/Senior Management personnel, I hereby acknowledge that I have complied with the code of conduct for Board and Senior Management personnel framed under Regulation 17(5) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. I understand that it is my responsibility to consult the company Secretary & Compliance Officer if I have any questions regarding the provisions of this Code.

I understand and agree that as a Director/Senior Management personnel, it is my responsibility to promote the application of this Code.

_____
(Name)

_____
(Signature)

_____
Designation

_____
(Date)