

RAJ POLYPACK LIMITED

Code of Conduct for Directors and Senior Management (Policy approved by the Board of Directors on September 25, 2025)

1. Preamble

This Code of Conduct ("Code") has been adopted by the Board of Directors of **RAJ POLYPACK LIMITED** ("the Company") in compliance with Regulation 17(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The Code is intended to provide guidance to the Directors and Senior Management in carrying out their duties and responsibilities ethically and in compliance with the applicable laws, rules, and regulations.

2. Applicability

This Code applies to:

- All members of the Board of Directors (including Independent Directors)
- Members of Senior Management, if any (i.e., personnel of the Company who are members of its core management team, including all functional heads)

3. Core Principles

All Directors and Senior Management personnel shall:

- **Act in good faith**, with honesty, integrity, and transparency.
- **Comply with all applicable laws**, rules, and regulations of India and other jurisdictions, as applicable.
- **Avoid conflicts of interest** and disclose any personal interest that may affect or appear to affect their independence.
- **Maintain confidentiality** of all information obtained in the course of their duties.
- **Exercise due care, competence, and diligence** in carrying out their responsibilities.
- **Not exploit their position** for personal gains or to the detriment of the Company.
- **Ensure fair dealings** with the Company's stakeholders including shareholders, employees, customers, and suppliers.
- **Protect and properly use the Company's assets**, resources, and proprietary information.

4. Conflict of Interest

A conflict of interest exists when a personal interest interferes, or appears to interfere, with the interests of the Company. Directors and Senior Management must:

- Avoid situations where their personal or financial interest conflicts with the interests of the Company.
- Disclose any potential conflicts to the Board or the Compliance Officer at the earliest.

5. Compliance with Laws and Regulations

All Directors and Senior Management shall:

- Abide by the provisions of applicable laws including the Companies Act, SEBI Regulations, and any other applicable laws.
- Not engage in any activity that is unlawful or unethical.
- Cooperate with regulatory and investigative authorities when required.

6. Confidentiality of Information

- Any confidential information obtained during the tenure must not be disclosed to anyone except as required by law or with proper authority.
- This obligation continues even after cessation of office.

7. Insider Trading

All Directors and Senior Management are required to comply with the Company's **Insider Trading Policy** and the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

8. Fair Dealing

The Company seeks to outperform fairly and honestly. Directors and Senior Management must:

- Respect the rights of all stakeholders.
- Not engage in manipulation, concealment, abuse of privileged information, misrepresentation, or any unfair dealing practice.

9. Compliance with Code

Any violation of this Code shall be reported to the Company Secretary or Compliance Officer. The Company shall take appropriate disciplinary action, which may include removal from office or termination of services.

10. Annual Affirmation

All Directors and Senior Management personnel shall affirm compliance with this Code on an **annual basis**. The declaration shall be placed before the Board and disclosed in the Annual Report, where applicable.

11. Amendment and Waiver

This Code may be amended from time to time by the Board of Directors. Waivers of any provision of this Code for Directors or Senior Management shall be placed before the Board for approval.