

BASANT AGRO TECH (INDIA) LIMITED

Code of Conduct & Ethics for Directors and Senior Management

Introduction

This Code of Conduct (Code) has been framed under the Regulation 17 (5) (a) of the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 with the Stock Exchange as amended by the Securities Exchange Board of India.

The Code has come into effect from the date of its adoption by the Board of Directors at their duly convened and constituted meeting. This Model of Code of Conduct help Directors & Senior Management team of the Company to live up to Company's ethical standards.

The Directors both executive and non executive, are obliged to carry out their duties in an honest, fair, diligently and ethical manner, within the scope of the authority conferred upon them and in accordance with the laws, rules regulations, agreements, standards. They have duty to make decision and implement policies in the best interests of the Company and its stakeholders.

Applicability

Directors, both executive and non-executive Directors

Senior Management Personnel shall mean personnel of the Company who are members of its core management team excluding Board of Directors and would comprise of all members of management one level below the executive directors, including viz. Company Secretary, Manager, CEO, CFO, all Functional Heads, all Unit Heads, Presidents, vice Presidents and all other executives having similar or equivalent rank in the Company

Below is the code of conduct

No Conflicts of Interest:

Each Director and Senior Management personnel is expected to avoid and disclosed any outside activity, financial interest or relationship that may present a possible conflict of interest or the appearance of a conflict. The Directors & Senior management personnel are required to disclosed to the Board any situation that may be or appear to be, a conflict of interest.

- Make disclosure of acceptance of directorship on the Board of other Companies.
- Executive directors and senior personnel shall not work for or receive payments for service from any competitor, customer, distributor, or supplier of the

Company without approval of the Board.

- Directors and Senior Management personnel shall not use personal influence to make the Company, amounts to conflict of interest.
- Directors and Senior Management personnel shall avoid actions that could reasonably be construed as being anti-competitive, monopolistic or otherwise contrary to laws, governing competitive practices in the marketplace.

Compliance with Laws, Rules and Regulations:

All Directors and Senior Management Personnel are expected to comply with all laws, rules and regulations, including insider trading laws, in each jurisdiction in which it does business.

Confidential of Information:

The Director/Senior Management Personnel of the Company shall observe strict secrecy and confidentiality with regard to all transactions/dealings & affairs of the Company and shall not disclose to any person as may be authorized by the Board of Directors or use otherwise than solely for the benefit of the Company in the course of his/her duties or as may be required by law or for smooth conduct of the Company's business.

Reporting of Illegal act or misconduct:

The Company actively promotes honesty and transparency in all its business activities and disclosure any type of misconduct in the Company.

All Directors and Senior Management Personnel are required to report violations of laws, rules and regulations by any employee of the Company to the Board of Directors or the Whole-time Director as may be relevant. Every effort will be made to protect the confidentiality of those furnishing information.

Accountability for Adherence to this Code; Violations of this code:

It is the duty and obligation of every director and Senior Management person to comply with this code of conduct and he/she shall acknowledge and affirm ongoing compliance with the code on an annual basis. Any violation of the code shall be reported to the chairman of the Board and to the Compliance Officer of the Company. This code of conduct shall be posted on the website of the Company.

Acknowledgement

The Director and Senior Management personnel shall read and fully understand this model code of conduct and comply with the policies, procedures and principles contained therein