



Shrine Chemicals

Code of Conduct

At Shrine Chemicals, we commit to conducting our business with honesty, responsibility, and transparency. This Code of Conduct defines the ethical principles and compliance standards expected of all employees, contractors, suppliers, board members, and representatives.

Core Values

- **Integrity:** We conduct business ethically and transparently.
 - **Compliance:** We follow laws and regulations diligently.
 - **Responsibility:** We own our decisions and actions.
 - **Excellence:** We uphold quality in all operations.
 - **Safety:** We ensure safety in handling chemicals and workplace environments.
 - **Respect:** We value diversity, fairness, and mutual respect.
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1. Compliance with the Law, Internal Guidelines and Policies

Shrine Chemicals and its employees are committed to conducting business in full compliance with all applicable laws, regulations, and internal policies.

- Fully comply with the laws and regulations of the United Arab Emirates and any other jurisdictions in which we operate, such as but not limited to anti-trust, labor, environmental, and tax laws.
- Adhere to all applicable chemical trading, distribution, environmental, and safety regulations.
- Cooperate fully with regulatory bodies and authorities.

Non-compliance can result in legal or disciplinary action, including termination of employment or contractual relationships.

2. Competition and Antitrust Law

Shrine Chemicals promotes free and fair competition and opposes any anti-competitive practices. We do not tolerate price-fixing, collusion, or deceptive marketing. Employees must comply with anti-trust and fair-trading laws.

- Employees must avoid any activities that restrict competition including:
 - Price-fixing
 - Bid-rigging
 - Market sharing arrangements or collusion
- We do not misuse market power to gain unfair advantage.
- Gathering competitive intelligence must be legal and ethical.



- Employees must deal fairly with competitors, suppliers, and customers. Such dealings must be based on quality, compliance and ethics.

3. Bribery, Corruption and Fraud Prevention

Shrine Chemicals maintains a strict zero-tolerance policy against bribery and corruption in any form. Prohibited activities include:

- Offering, giving, or accepting bribes or kickbacks
- Misuse of position for personal gain
- All payments and gifts must be transparent, declared, and reasonable. Gifts, entertainment, or hospitality that influence business decisions are strictly prohibited.
- Fraudulent acts, falsifying documents, or embezzlement will result in immediate disciplinary action.
- Employees must never offer, give, solicit, or accept any form of bribe or improper payment.
- All business dealings must be transparent, well-documented, and auditable.
- Corporate credit cards are for authorized expenses only and all purchases must be documented and reported.
- Travel and Entertainment expenses must be reasonable and business related.



4. Money Laundering

Shrine Chemicals prohibits any form of money laundering or financing of illegal activities.

- Employees must:
 - Conduct due diligence on clients, suppliers, and partners
 - Be Vigilant and Report any suspicious transactions
 - Avoid handling funds from suspicious or unverified sources
 - Mandatorily comply fully with UAE Anti-Money Laundering (AML) laws.
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5. Insider Trading

Employees must not use non-public, material information for personal or third-party gain.

- Trading shares or disclosing sensitive information about:
 - Our company
 - Suppliers, customers, or partners without authorization is strictly forbidden.
- Violators are subject to criminal penalties under UAE and international law.



6. Conflicts of Interest

Employees must act in the best interests of Shrine Chemicals, avoiding any activities that conflict with company responsibilities.

- Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of Shrine Chemicals.
- Employees must not exploit business opportunities that belong to Shrine Chemicals for personal gain.
- Any potential conflicts must be disclosed to management immediately.
- Outside employment or business activities that may interfere with duties at Shrine Chemicals must be approved by management.
- Examples include:
 - Having financial interest in competitors or suppliers
 - Hiring or supervising family members
 - Accepting personal benefits that could influence decisions
- Conflicts, or any situations that could appear as such, must be disclosed immediately to management.
- Executive officers and board members must disclose any direct or indirect interests in competing firms and abstain from decision-making where personal interest exists.
- Employees must obtain prior approval before serving on any external board, especially those involving chemical industry peers, suppliers or regulators.



7. Foreign Trade Compliance

Shrine Chemicals adheres to all UAE import/export regulations and international trade controls.

- We ensure:
 - Proper licensing for import/export of chemicals
 - Compliance with sanctions, embargoes, and dual-use goods restrictions
 - Employees involved in cross-border transactions must follow the company's export control procedures.
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8. Books, Records and Financial Reporting

We maintain accurate, timely, and complete financial and operational records.

- All entries in books, records, and accounts must:
 - Reflect actual transactions
 - Comply with applicable accounting standards
 - Be stored per legal and regulatory requirements
 - Falsifying, omitting and destruction of records is prohibited and considered fraud.
 - Expense reports, invoices, and corporate card usage must be properly documented.
 - Any suspected fraud must be reported immediately.
 - Only authorized personnel may bind the company in contracts or approvals.
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9. Confidentiality

Employees are required to protect all non-public, proprietary, confidential or sensitive information belonging to Shrine Chemicals and its partners. Information must not be disclosed to unauthorized persons, inside or outside the company, without proper authorization.

- Do not share internal information unless:
 - Authorized
 - Legally required
 - This includes:
 - Business strategies
 - Client data
 - Pricing, contracts, and R&D
 - Confidential obligations continue after employment ends and unauthorized disclosure is a serious breach of trust.
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10. Data Protection and Information Security

We are committed to safeguarding personal data and digital assets.

- We comply with UAE Data Protection Law and international standards.
 - Personal data (PII), business-sensitive files, and digital infrastructure must be:
 - Stored securely
 - Accessed only with authorization
 - Protected from breaches or leaks
 - IT policies on email, passwords, cloud storage, and social media must be followed strictly.
 - **Acceptable Use**
 - Electronic systems must be used for legitimate business only.
 - Passwords, software, and systems must be kept secure.
 - Personal use is permitted within reason and must not interfere with work.
 - **Email, Messaging & Social Media**
 - Employees must follow cybersecurity protocols.
 - Must be professional, secure, and not defamatory.
 - Avoid sharing confidential info or misrepresenting the company.
 - Unauthorized software installation is prohibited.
 - Unsecured sharing of sensitive information is prohibited.
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11. Handling and Safeguarding of Shrine Property

Shrine Chemicals' assets, including facilities, equipment, information systems, and intellectual property, must be used responsibly and only for legitimate business purposes.

- Includes:
 - Computers, phones, facilities, vehicles
 - Chemicals, equipment, and intellectual property
 - Employees must protect these from:
 - Theft
 - Damage
 - Misuse
 - Unauthorized access, disclosure or personal use
 - Loss or damage must be reported promptly.
 - Employees must not exploit company information or property for personal gain.
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12. Human Rights and Labor Practices

Shrine Chemicals supports and respects internationally recognized human rights. We provide a safe, inclusive, and respectful workplace, free from harassment, discrimination, or abuse. We comply with all UAE labor laws and regulations.

We strictly prohibit:

- Forced labor
 - Child labor
 - Discrimination and harassment
 - Human trafficking
 - Use, possession, or influence of illegal drugs or alcohol at work
 - Physical or verbal abuse
- We ensure:
 - Safe and inclusive workplaces
 - Equal opportunity employment
 - Fair wages and lawful working conditions

At Shrine, there is zero tolerance for discrimination or harassment based on race, gender, religion, or other protected characteristics. Employees are encouraged to report unsafe behavior or threats immediately.



13. Health, Safety and Environmental Protection

Shrine Chemicals places the utmost importance on health, safety, and environmental stewardship. We commit to Sustainable sourcing and responsible distribution; Reducing environmental impact of chemical storage and logistics and Continuous improvement in environmental stewardship.

- Employees must strictly adhere to our HSE policies, procedures and regulations.
 - Chemical handling and disposal must meet environmental standards to minimize impact.
 - All incidents, near-misses, and unsafe conditions must be reported immediately.
 - Employees must:
 - Follow safety protocols
 - Report hazards and near misses
 - Wear appropriate PPE
 - We strive to minimize environmental impact by following best practices in chemical handling, storage, transportation, and disposal.
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14. Summary and Reporting

- Code violations, unsafe practices, fraud or financial misconduct must be reported anonymously through our Ethics & Compliance Report Line.
 - Shrine Chemicals enforces non-retaliation for good-faith reporting.
 - Communication and Representation
 - Employees must ensure that all communications, whether internal or external, reflect the company's values and reputation. Only authorized personnel may represent Shrine Chemicals publicly or to the media. Information shared on social media must not disclose confidential information or damage Shrine Chemicals' image.
 - **Reporting Violations**
 - Employees are encouraged and expected to report any suspected violations of this Code of Conduct, Shrine Chemicals €™ policies, or applicable laws. Shrine Chemicals prohibits retaliation against anyone who reports concerns in good faith. Reports can be made confidentially through designated internal channels.
 - **Disciplinary Action**
 - Violations of this Code will result in appropriate disciplinary measures, which may include verbal or written warnings, suspension, termination of employment, legal action, referral to authorities or other remedies.
 - **Continuous Improvement**
 - Shrine Chemicals is committed to the continuous review and improvement of this Code of Conduct. The Code will be reviewed annually and revised as needed. Employees are expected to participate in regular training and updates on ethical conduct and compliance standards.
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Acknowledgment and Responsibility

All employees, officers, and representatives are responsible for understanding and complying with this Code. By signing below, you agree to uphold the standards and report any violations.

Name: Mr. Sundeep Gopal Hazari

Position: Managing Director

Signature:

Date: 30/04/2025