ESOTERIC MINERAL SOLUTIONS PVT LTD

Code of Conduct

This Code of Conduct sets out the ethical standards and business principles that guide how Esoteric Mineral Solutions (EMS) operates. It applies across our value chain, from the mica we source to the pigments we deliver, and it is how we make sure we act with integrity, comply with the law and behave responsibly.

VERSION	EFFECTIVE FROM	APPROVED BY
1.0	27 November 2026	Tushar Chhaperia, Founder & CEO
NEXT REVIEW November 2027		

1. Who this Code applies to

This Code applies to every director, employee, trainee and contract worker of Esoteric Mineral Solutions Pvt Ltd, wherever they work. We also expect our suppliers, contractors, distributors and other business partners to follow the same standards when they work with us or on our behalf.

Where this Code and the law differ, we follow whichever sets the higher standard.

2. Compliance with the law

We comply with all laws and regulations that apply to our business in India and in the countries we supply, including laws on labour, health and safety, the environment, taxation, trade, competition and product safety. We keep the licences, registrations and permits our operations require.

3. Business integrity

Bribery and corruption

We do not offer, pay, request or accept bribes, kickbacks or facilitation payments of any kind, directly or through third parties, whether to public officials or private parties. We comply with the Prevention of Corruption Act, 1988 and other applicable anti-corruption laws.

Gifts and hospitality

Gifts and hospitality may be given or accepted only if they are modest, infrequent, openly recorded and not intended to influence a business decision. Cash or cash equivalents are never acceptable.

Conflicts of interest

Everyone covered by this Code must avoid situations where personal interests conflict with those of EMS, and must declare any actual or potential conflict to management so that it can be managed fairly.

Fair competition

We compete on the quality, price and service of our products. We do not fix prices, divide markets, rig bids or exchange competitively sensitive information with competitors.

Accurate records

Our financial and business records, test results, certificates of analysis and product documents are complete, accurate and honest. We never falsify data or documents.

Trade controls and money laundering

We comply with applicable trade sanctions, export controls and customs rules, and we take reasonable steps to make sure our business is not used for money laundering or the financing of illegal activity.

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4. Human rights and fair labour

We respect internationally recognised human rights, including the principles of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

- **No child labour.** We do not employ anyone below 18 years of age, and we do not accept child labour anywhere in our supply chain.
- **No forced labour.** All work is voluntary. We do not use forced, bonded, trafficked or prison labour, we do not hold workers' identity documents, and workers are free to leave their employment with reasonable notice.
- **Fair wages and hours.** We pay at least the legal minimum wage, provide all statutory benefits, pay on time, and keep working hours and overtime within legal limits. Overtime is voluntary and paid as required by law.
- **Equal treatment.** We do not discriminate on the basis of caste, religion, gender, age, disability, marital status, sexual orientation, origin or any other personal characteristic in hiring, pay, training, promotion or dismissal.

- **Respect and dignity.** We do not tolerate harassment, abuse, threats or physical punishment. We comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- **Freedom of association.** We respect workers' right to join or not join an association or union and to raise concerns collectively, without fear of reprisal.

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5. Health and safety

We provide a safe and healthy workplace. We identify and control hazards in our laboratory and production facility, including dust and chemical exposure, provide suitable personal protective equipment and training at no cost to workers, maintain emergency procedures, and investigate incidents so they do not happen again. Every worker has the right to stop work they believe is unsafe.

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6. Responsible mica sourcing

Mica from parts of India has been linked to child labour and unsafe working conditions. We take this risk seriously.

- We source mica only from suppliers who can show it is free of child labour and who meet the requirements of the Responsible Minerals Initiative (RMI).
- We keep records that allow our mica to be traced back to its source.
- We require our mica suppliers to follow this Code and may review or audit them to check that they do.
- If we find a breach, we act on it, and if it is not corrected we stop working with that supplier.

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7. Environment

We comply with environmental laws and permits, and we work to reduce the environmental impact of our operations. This includes using energy, water and raw materials efficiently, handling and disposing of chemicals and waste safely, preventing pollution of air, water and land, and considering environmental impact when we develop new products and processes.

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8. Product quality and safety

We supply products that meet their stated specifications and applicable regulatory requirements. We provide accurate technical data sheets, safety data sheets and certificates of analysis, and we tell customers promptly about any issue that could affect the quality or safety of a product they have received.

9. Confidentiality and data protection

We protect confidential information belonging to EMS, our customers and our suppliers, including formulations, pricing and technical data, and use it only for the purpose it was shared. We handle personal data lawfully and securely, in line with the Digital Personal Data Protection Act, 2023.

10. Our suppliers and business partners

We choose suppliers and partners who share our commitment to ethical, safe and responsible business. We expect them to meet the standards in this Code, to apply similar standards to their own suppliers, and to tell us about any breach. We may ask for information or carry out reviews to confirm compliance.

11. Raising concerns

Anyone, inside or outside EMS, who suspects a breach of this Code or of the law is encouraged to report it. Concerns can be raised with a manager or directly with the company's leadership at info@esotericminerals.com, marked "Confidential: Code of Conduct".

Every report is treated confidentially and looked into fairly. We do not tolerate retaliation against anyone who raises a concern in good faith.

12. Responsibility and review

The Founder & CEO is responsible for this Code. Every employee receives it when they join and is trained on it. Breaches may lead to disciplinary action, up to and including dismissal, and for business partners, to the end of the business relationship. We review this Code at least once a year and update it when our business or the law changes.