



Century's Conflict of Interest Policy

Century Paper & Board Mills Limited expects all employees to be free from actual or potential conflicts of interest.

A conflict of interest arises when there exists a potential for either direct or indirect personal benefit that exerts an influence or gives the appearance of influencing, an employee's decision-making or behaviors during the course of conducting the affairs of the business. This situation particularly concerns instances where the employee holds a primary responsibility towards the Company and is under the obligation to refrain from engaging in activities or transactions that directly contradict the Company's best interests. Such situations could arise in a number of ways.

Presented below are a few of the expressly prohibited scenarios; this list is by no means exhaustive or all-encompassing. Should uncertainty arise, it is advisable to solicit guidance from the managerial authorities.

- An employee or any member of his / her family (for the purpose of this code family includes parents, spouse, children, and siblings in a position to influence) having an interest in any organization supplying goods or services to the Company.
- Any employee conducting personal business activities on the company premises or using company facilities for such purposes.
- Gaining personally from, performing any work for, or serving as a consultant, advisor, employee, or director of any competitor, supplier, or customer.
- Using company equipment, assets, or time to engage in non-Company activities, unless expressly authorized in writing by the CEO.
- Involvement in financial transactions with, or ownership or influence over financial stakes in competitors, customers, or suppliers.
- Family Members can work in Century, provided they are not working in any capacity where one position might be able to influence the other one. If the relative of an existing employee applies for a position at Century, then the employee will not be allowed to participate in the selection or recruitment of that position.



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- In the event of a familial relationship emerging subsequent to the initiation of employment within the organization, the employee must expeditiously notify the Human Resource Department (HRD) in writing.
- Receiving remuneration or any substantial item of value (equivalent to or exceeding Rs. 5000) from third parties who currently maintain or intend to establish a business association with the Company.

Reporting Conflicts:

Any actual or potential conflict of interest has to be reported in writing to the HR and Internal Audit Heads.

Prepared By :

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