



**CODE OF CONDUCT POLICY
UNDER RULE 5(4) OF
THE PUBLIC SECTOR COMPANIES (CORPORATE GOVERNANCE) RULES, 2013**

This is the Code of Conduct Policy (the "**Policy**") of **M/s Frontier Oil Company1 (Private) Limited** (the "**Company**"). This Policy is developed pursuant to the Public Sector Companies (Corporate Governance) Rules, 2013 (the "**CG Rules**").

1. Code of Conduct under the CG Rules Rule 5(4) of the CG Rules state that:

"The Board shall ensure that professional standards and corporate values are in place that promotes integrity for the Board, senior management and other employees in the form of a "Code of Conduct". The code of conduct shall articulate acceptable and unacceptable behaviors. The Board shall ensure that appropriate steps are taken to communicate throughout the company the code of conduct it sets together with supporting policies and procedures, including posting the same on the company's website. The Board shall also ensure that adequate systems and controls are in place for the identification and redressal of grievances arising from unethical practices."

2. Scope and Application This Policy outlines the conduct expected from the Company Personnel of the Company and sets out matters relating to grievance redressal. Each Company Personnel is recruited in accordance with the Human Resource Manual (the "**HR Manual**") of the Company and all detailed matters relating to selection and hiring, compensation and facilities, Company SOP's, resignation and exits, etc. are all covered therein. Therefore, this Policy should be read in conjunction with the HR Manual and in case of a conflict between the HR Manual and this Policy, the HR Manual shall prevail. This Policy applies to all directors, executives and employees of the Company (the "**Company Personnel**") and provides the framework of principles for conducting business, dealing with other employees, clients, consultants, contractors and suppliers. This Policy broadly requires the Company Personnel to:

CODE OF CONDUCT DECLARATION

I, Company Secretary, have read, understand and agree to abide by the Code of Conduct Policy of **Frontier Oil Company1 (Private) Limited** (the "**Company**") and I understand that such adherence is a condition of my employment.

I understand that a violation of the Code of Conduct Policy may be grounds for termination or immediate dismissal for just cause without notice or pay in lieu of notice.

SIGNATURE/SYED AMEER ALI JEFFERY



DESIGNATION: COMPANY SECRETARY

Date Adopted:

29th Dec 2021