

CODE OF CONDUCT FOR BOARD OF DIRECTORS AND SENIOR MANAGEMENT OF COMPANY OF GLOBUS
SPIRITS LIMITED

Board of Directors of the Company has revised its Code of Conduct for all members of Board of Directors and Senior Management of the Company to bring it in conformity with provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

MEANING OF SENIOR MANAGEMENT

It means officers/personnel of the company who are members of its core management team excluding Board of Directors comprising all members of management one level below the chief executive officer/managing director/whole time director/manager (including chief executive officer/manager, in case they are not part of the board) and shall specifically include company secretary and chief financial officer.

DUTIES OF DIRECTORS INCLUDING INDEPENDENT DIRECTORS

The Directors including Independent Directors shall adhere to the roles and duties as defines under the provisions of Companies act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 besides other roles and duties as may be referred by the Board of Directors of the Company from time to time.

COMPLIANCE WITH LAWS

1. The Company's Directors and Senior Management shall comply with all the applicable provisions of laws and regulations of the countries in which the company operates. Company's Directors and Senior Management shall contact Company's legal counsel in case they have questions regarding applicable laws.
2. Directors and other Senior Management are expected to be sufficiently familiar with any legislation that applies to their work, to recognize potential liabilities and to know when to seek legal advice.
3. No Director or Member of Senior Management shall ignore or disobey or non-comply the policies as approved by the Board from time to time or pressurize the employees underneath to ignore, disobey or non-comply the policies of Good Governance as approved by the Board and available on the website of company www.globusspirits.com
4. Directors or Members of Senior Management are expected to comply with the Insider Trading Regulations of the Company and/or any other regulations/guidelines regarding investment in the Company's shares issued, from time to time, by the Securities and Exchange Board of India (SEBI).

CONFLICT OF INTEREST

1. Every Director and Member of Senior Management must avoid any situation in which there is an actual or apparent conflict of interest that could interfere or could be perceived to interfere with the Director's or Member of Senior Management's judgment in making decisions in the Company's best interests
2. In a situation where an individual's personal interest interferes with that of the company's, he/she should promptly disclose the interest or facts by way of notice to the Board and should avoid involvement in concerned dealings without the permission of the Board.
3. Directors and Member of Senior Management will perform their duties conscientiously.

DISCLOSURE OF INTEREST

All the members of Board shall mandatorily disclose their interest and directorships in other company(s), if any to the Board in its first meeting for the financial year.

In addition to the above, any member who becomes interested in manner specified above shall also inevitably disclose the fact in the next Board meeting

GIFTS AND BENEFITS

Gifts and rewards at personal level from external parties by whatsoever name called, should be avoided. The Directors & Senior Management Executives shall not accept any favor or personal gains or by way of cash or kind from the people doing business with the company, competitors or consultants.

CONFIDENTIAL INFORMATION

The Board & Senior Management should ensure that the confidential information of the company is well secured and should take every possible step to protect it from industrial espionage and other unauthorized access. Disclosure of confidential information by anyone should be promptly reported to the Board.

DISCIPLINARY ACTIONS

In case of Non-compliance with the code of conduct by any director(s) or senior management executive(s), Board may take disciplinary action against him/them after giving an opportunity of clarification.

Disciplinary action may be in the form of temporary suspension from office or fine, depending upon the nature of default.

AMENDMENTS TO THE CODE

The Board of Directors of the company or a committee thereof may review or amend the code after a time period as the Board may decide or deem appropriate.

Amendment as decided by the Board shall be fair, justifiable, for the betterment of and in the interest of all the stakeholders.

AFFIRMATIONS

All the Board members and senior management personnel shall affirm compliance with the Code on an annual basis.