



HMA GROUP
Code of Conduct



HMA

Code of Conduct

Message from the Founder

HMA Group, is one of India's leading exporters of Halal Frozen Boneless Meat, boasting a long-time tradition and experience of exporting Halal Frozen Boneless Buffalo Meat to more than 60 countries around the world.

We are group of Individuals working with passion to make a difference.

Our “code of conduct” comprises our ethics, dedication and commitment to sparkle our Vision:

“We Believe in Quality Only”



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Approved By	Place	Effective From
Chairman of the Board	Head Office, Agra	1 st January, 2024

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FOREWORDS

HMA, is committed to develop and promote a healthy work environment to regulate fair business practices in adherence to the legal compliances. HMA Group strives towards setting an atmosphere in which all the employees, business associates and all the stakeholders work with honesty, ethics and respect.

1. OBJECTIVE & APPLICABILITY

This Code of Conduct has been formed to set a guideline for all of our employees about their behavior and actions with their Seniors, Peers, Subordinates, Our Service Providers, Consultants, Suppliers and all the stakeholders during the tenure of their employment in the group. Also, to ensure the proper adherence of statutory compliance related to the locations/ States in which we operate.

This Code of Conduct will be applicable to the Company and its all Units, Subsidiaries irrespective of locations, all of our employees, workers, contractual workers/consultants, directors on full time and part time employment with Company business associates, Customers, Communities and the environment in which we are operational. Our Suppliers, Financial Stakeholders, Service Providers and all the people/ entity associated with us. For the purpose of this code of conduct, all the above classes of persons working with us would be called employees for this code of conduct.

This Code of Conduct must be properly followed by all of the concerned.

2. EFFECTIVE DATE OF POLICY

This Code of Conduct will be effective from 1st January 2024

3. COVERAGE OF CODE

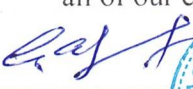

3.1 CREATING AND DEVELOPING HEALTHY WORK ENVIRONMENT

a) Behavior at Work Place

All the employees shall behave with respect, professionalism, morale, ethics, Integrity and utmost care within the working space and environment. No threatening or violence will be accepted at any level within/ outside the work premises which comes under the purview of employment. There must be ethical, fair and transparent conduct with the outsiders and third parties too.

b) Operational Safety

We never compromise with the safety standards and guidelines and ensure the highest commitment to provide the safe, hygienic, clean and healthy work place to all of our employees and work associates.

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c) Formal Dressing

All the employees must follow the proper and formal dressing attitude while being in working environment and the places related to the business operations. If any dress code is prescribed to any class of employees it has to be strictly followed.

d) Offer/ Appointment for Employment

We always welcome our new business hands in our group with prestige and dignity. Offer/ Appointment letter will be issued on the basis of the terms discussed and agreed between. The acknowledged copy will show the acceptances and binding to the terms and conditions mentioned in the letter which may be, in any case, if arises, treated as documented evidence for any legal proceeding or query.

e) Punctuality and Attendance

All the employees must be bind with the prescribed shift timing and attendance and will maintain highest level of punctuality in the working routine.

Grant of Leave

All employees have to take proper leave sanction before taking or availing the leave with proper reason for such leave. They will intimate the reason of their leave and proper arrangements will have to be made by them for doing the office work in their absence. However, they would be attending to the calls of the business, even during the period of leave because of business exigencies and would co-operate in every respect in doing so. If they going out of station then the station be mentioned alongwith the contact details there.

Maternity/Paternity Leave

These leaves can be availed by the eligibles as per the applicable laws and regulations.

f) Notice Period during separation from employment

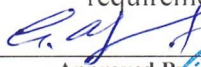
All the probationary employees will serve the notice period of 01 month and for the confirmed employees after probation period, the notice period will be of 2-3 months as may be prescribed in the offer/ appointment letter. If a employee leaves before the notice period then he has to pay the salary in lieu of notice period.

No employee will serve as an employee, agent, director, partner or consultant of any other business enterprise. Also, employees who resign from the services of the Group/Company should not take up employment with a competitor for a period of at least two years.

g) Geographical Transfer

The employees, we hire, are for business growth and group's development. Thus, as per the business requirement, all the employees are liable for the location transfer in which we operate. The frequency of the transfer will also be based on the business requirement and this will be the responsibility of everyone to adhere to the same.

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h) Retirement from employment

Employees at reaching the age of 60 years would retire from employment. An employee can also be retired before attaining the retirement age on the ground of incapability to perform the assigned responsibilities due to Physical or mental infirmity. Age calculation will be done on the basis of date of birth of the employee provided in the documents at the time of his joining.

i) Harassment and Discrimination free Work Place

We always try our best to ensure that all of our employees must respect the rights of all individuals with applicable laws on the basis of their ability and with respect. This will be done irrespective of caste, creed, gender, religion and physically challenge to maintain the dignity and respect of individuals.

For the prevention of sexual harassment at the workplace all the employees will adhere to the "Prevention of Sexual Harassment" (POSH) policy of the Group. We have "Zero Tolerance" towards this. Also, as per the regulatory requirement we have also formulated a "VISHAKHA COMMITTEE" and an Internal Complaint Committee to address such incidents as and when reported. Further to address any act of misconduct, we have the internal complaint committee which takes up the matter.

j) Open door Policy

HMA has a culture of Open-Door policy wherein all the employees are free to walk-in to any superior or peers. The organization always invite and welcome inputs from different segment and space of employees. The junior most resource can very comfortably walk into the cabin of a CEO and discuss with him. The HR Head of the company is very approachable as well.

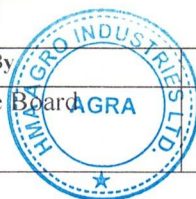
k) Restriction of use of Alcohol/ Drug instances and Weapons Work Place

We never allow the consumption, possession or use of any type of drug/ alcohol and restricted/ unauthorized substances/ weapons at workplace, on Company premises or off-site while on Company business.

l) Disciplinary Actions

We always promote the empathic business environment in the group but sometime, in certain cases, we have to follow the rules to maintain the discipline and values for business requirements.

In case of violation of any applicable law, policy, code or any guidelines pertaining to the business/ statutory requirement, warning letter/s can be issued to the concerned employee/ person which may lead to the termination of employment or association from the group and all/some of the monetary dues may also be forfeited.

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3.2. CONFIDENTIALITY, WORKPLACE PRIVACY & NONDISCLOSURE OF INFORMATIONS

HMA believes in protecting the information generated and acquired inside the company or in business relations. A lot of collective hard work is involved when we do business, so during the journey at any point of time, shall such information be shared to any person / group / organization / institution. It is mandatory for all the employees on the day of joining to sign a Non-Disclosure Agreement. This is an undertaking by an employee to maintain the confidentiality of the company's information. If at any point of time the company comes to know that this information is being compromised, then disciplinary action is initiated on the person. We also have a reporting email address where any vendor, employee, stake holder can inform us that certain information has been leaked.

Business records and secrets are the pillars for the purpose of establishment and growth of the organization which can never be disclosed to anyone. These records may include product information, quality analysis, market strategies, customers and suppliers' details, financial information, business plans, buyers' preference and requirements and the any such information. In this way every employee, during their employment tenure and thereafter, is bound to protect and maintain the confidentiality of such data, records and information in any form including soft copies.

HMA employees must comply with applicable privacy and data security laws, as well as applicable contractual requirements when handling personal information and business data collected in the course of conducting business. Failure to do so is not only a breach of this Code, but also potentially a breach of civil and/or criminal laws related to data protection. Every employee shall ensure, at all times, the integrity of data or information furnished by him/her to the company. He/she shall be entirely responsible for ensuring that the confidentiality of all data is retained. The company ensures that all entries made in the company's books and records are complete and accurate, and comply with established accounting and record-keeping procedures. The company maintains the confidentiality of all forms of data and information entrusted to it and prevents the misuse of information belonging to the company or any client.

3.3. MOONLIGHTING

At HMA, we have a strict policy against moonlighting. Moonlighting refers to engaging in secondary employment or business activities outside of an employee's primary role at. It is strictly prohibited for all employees, regardless of their position or employment status. Moonlighting poses potential conflicts of interest and can impact an employee's ability to fulfill their responsibilities effectively. It may lead to divided attention, reduced productivity, and compromised confidentiality and proprietary information. By accepting employment at, employees agree to dedicate

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their full time, attention, and effort to their roles within the company. Any engagement in secondary employment or business activities is a violation of company policy and may result in disciplinary action, up to and including termination of employment.

3.4. POLITICAL ACTIVITIES

Employees may participate in community affairs, and support the political party or candidate of their choice. The employee's political leaning is an aspect of his/her social life and purely his/her personal choice. Employees need to be completely apolitical and not indulge in any political activities such as canvassing for any party/position/ person etc. while at work or within the company premises. Employees, who in their individual capacity wish to contest any elections for any legislative office or municipal or local panchayat council, will need to take the prior written approval of the HR department. The employee/employee's manager should send a copy of the written approval to the HR Department and the Legal department.

3.5. HUMAN RIGHTS

We treat people with respect and dignity. Any kind of harassment will not be accepted at any cost.



Child labor and Forced/ Compulsory labor is completely restricted at entire group irrespective of its operational locations. We comply the applicable laws and statutory regulations at the geographies we operate.

3.6. COMPANY ASSETS

Company provides the assets to its employees for the purpose of business-related activities which is completely prohibited for personal benefit or non-business activities. The assets may be in tangible or intangible forms as well. The use of company assets will be in proper care without damage or wastage as the protection and safety of these assets is the prime responsibility of an employee.

3.7. COMMUNICATION WITH THE OUTSIDERS AND THIRD PARTIES

In view of the prestige of the group no one, without the prior approval of the Board, is allowed to make any statement publicly or in social media, Media, Investors or any external agencies and no compromise in this regard will be accepted in any manner.

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3.8. CONFLICT OF INTEREST

All the employees are expected to perform their roles and responsibilities towards the development and growth of the Group and all the employees including the directors must ensure that any personal/business association including their close relatives does not make a situation of conflict of interest with their roles and responsibilities in the Group's operation and also not involve in any activity/business which may conflict with interest of the Group.

In case of any such suspicious act, the concerned person must report to the competent authority (Management or Directors or HR) to take appropriate actions in an expeditious manner.

3.9. INSIDER TRADING

No employee will involve in any activity which may be come in the preview of insider trading and will also not assist anyone else (Including their family, relatives, friends) to obtain any type of gain or benefits from the Group. Any employee will also not use his official position for the purpose of providing any kind of gain or benefit to any other person nor involve in such kind of act which may come as abuse of his position. This kind of activities will not be tolerated or considered in any manner. Insider Trading invokes severe civil and criminal penalties not only on the Insider but also on the Company in certain circumstances under regulations issued in India under the Securities and Exchange Board of India (SEBI) Act, 1992. Group Companies whose stock is listed in stock-exchanges should abide by the "Prohibition of Insider Trading Regulations" code released by SEBI and all employees in these Companies covered by these regulations should strictly follow the guidelines laid down by SEBI.

3.10. HOSPITALITY, DONATION AND GIFTS



Sometimes, gifts and such acts promoted the healthy business relations and comprises the values of the recipients. Such act can be accepted in the purview of strengthening the business relations and values which should be on customary basis only, but if it leads to another way as taking benefits, gains and such kind of assistance from the any person or third parties is strictly prohibited.

3.11. STATUTORY COMPLIANCE AND REGULATORY AFFAIRS

We are committed towards the proper adherence of applicable laws and regulations pertaining to the business operations as well as to labor laws.

It is the prime responsibility of every employee to ensure the proper and timely compliance of all the governing laws and regulations while in business operations including oversees activities.

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3.12. BRIBERY AND CORRUPTION

We never tolerate the corruption in business operations as well as work environment. All the employees are bound to adhere to this culture and will not make or take any kind of payment or benefits, legal or illegal, to anyone, directly or indirectly, which can be considered to provide or get any undue favors related to the business.

3.13. ANTI MONEY LAUNDERING

We will never promote or involve in any act leading towards money laundering. We are committed to ensure that none of our employee will engage in such activity and incase, if any such potential activity, by any of the employee/ director, being noticed, we will cooperate properly in such legal proceeding.

No employee will involve in such prohibited activity and if it gets noticed, it must be reported immediately.

3.14. ENVIRONMENTAL COMPLIANCES

We are committed to comply with all the applicable laws for Environmental Sustainability. All of our employees will support to improve the environment in which we operate.



We are very careful about usage of natural resources specially in consumption of water and energy as well as the waste and hazardous materials management process.

All the employees must strive to promote and improve the environmentally sustainable activities and reduce the adversity in this regard.

4. CODE OF CONDUCT VIOLATION

In case, if any employee or person found violating the any of the part/s of this Code of Conduct, will be liable for the corrective and disciplinary action, including potential dismissal or termination from employment or any other legal action as required, will be taken according to the instructions of Chairman / Managing Director / Head of Human Resources.

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5. REPORTING CHANNELS

In case of any violation or suspected violation, the employees of the group shall report any queries or complaints to the HR Head. Such reports can also be forwarded to the senior management through following methods:

E-mail to: hrho@hmaagro.com

Post to: **18A/5/3, Taj View Crossing,
Fatehabad Road, Agra-282001
Uttar Pradesh (India)**

6. AMENDMENT AND REVISION OF CODE OF CONDUCT

This Code of Conduct will be reviewed as deemed necessary by the Board of Directors of the Company.

7. ACKNOWLEDGEMENT

I, hereby, acknowledge that I have received and carefully read the Code of Conduct of **HMA Group**.

I, with full of faith and consciousness, am signing this Certificate and I agree to comply and abide by the guidelines, rules, terms and conditions of this Code of Conduct and all other applicable policies and laws. I will not use any confidential or trade secret information after leaving the Company. In case of any violation/ potential violation, I have to report to available channels immediately.

Signature : _____

Full Name : _____

Department : _____

Designation : _____


Emp. ID (If allotted) : _____

Complete Permanent Address : _____

Acknowledged copy, with Signature must be submitted to HR/ Company for record purpose.

[Handwritten Signature]

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