

Code of Conduct

A. Introduction:

This Code of Conduct has been adopted by the Board of Directors to maintain the standard of business conduct for **Mideast Portfolio Management Ltd** ("the Company") and to ensure compliance with the requirements of clause 49 of the listing agreement entered into with stock exchange. The Code is applicable to the following persons, referred to as "Officer":

- a) All Members of the Board and
- b) Senior Management of the Company.

Explanation: For this purpose, the term "senior management" shall mean personnel of the company who are members of its core management team excluding Board of Directors. This comprises all members of management one level below the executive directors, including all functional heads. This Code governs the conduct of the Officers. Each such person should become familiar with its provisions. The Board of Directors appoints company secretary of the Company as its compliance officer for the purpose of this code. The Board of Directors reserves the right to amend, alter or enlarge this Code at any time. The Officers should conduct their activities in line with the following policies laid down by the Code and adhere to its compliance.

B. Principles and Conduct:

1. **Honest and Ethical Conduct:** The Officers shall deal on behalf of the Company with professionalism, honesty and integrity.
2. **Compliance with Law:** The Officers shall in their business conduct ensure compliance with all applicable laws, rules and regulations in all the territories in which the Company operates and adhere to the reporting system there under.
3. **Loyalty:** Officers have to devote their attention to the business interests of the Company. Officers are prohibited from engaging in any activity that interferes with their performance or responsibility to the Company or is otherwise in conflict with or prejudicial to the Company.
4. **Other Directorships:** The Company feels that serving on the Boards of other direct competitor companies may raise substantial concerns about potential conflict or interest. All officers must report / disclose their relationship with other companies to the Board and as and when there is a change therein.
5. **Conflict of Interest:** The Officers shall not engage in any business, relationship or activity which may detrimentally conflict with the interest of Company or the Group of Company. The Directors disclosure of interest under section 188 of the Companies Act, 2013 shall be treated as sufficient compliance under this clause.
6. **Insider Trading:** The Officers shall have to comply with the Code of Conduct for prevention of Insider Trading adopted by the Company.
7. **Equal Opportunities within the Company:** The Officer shall ensure that equal opportunities are provided to all employees of the Company and all qualified applicants for employment without regard to their race, religion, caste, ancestry, marital status, sex, age & nationality and that no exploitation or discrimination is done in this regard.

8. Healthy, safety and environment: The Officers shall strive to provide a safe and healthy working environment both within the organization and as part of the society and comply, in the conduct of its business affairs with all Regulations regarding the preservation of the environment of the territory the Company operate in.
9. Protection of Assets: The assets of the Company should be employed for the purpose of conducting the business for which they are duly authorized and they should not be misused.
10. Confidentiality: The Officers shall maintain confidentiality of information entrusted to them by the Company or any other information about the Company that comes to them except when disclosures is duly authorized or required by any law or regulation.
11. Reporting concerns: The Officers shall promptly report to the management any actual or possible violations of this Code, or an event he or she becomes aware of that could affect the business or reputation of his / her or any Group of company.

C. Violation of the Code:

The Company will take appropriate action against any Officer whose actions are found to violate the code or any other policy of the Company. Disciplinary action may include immediate termination of the employment at the Company's sole discretion. In case the Company has suffered any losses, it may pursue for recovery of such losses against the individuals or entities responsible.

D. Periodic Reporting of Compliance:

All Officers shall affirm compliance with the code on an annual basis at the end of the financial year of the Company.

Disclaimer: The Code of Conduct is a statement of certain fundamental principles, ethics, values, policies and procedure that govern the Officers of the Company in the conduct of the Company's business. It is not intended to and does not create any rights in any way in clients, suppliers, shareholders and any other person or entity.
