

Rakan Steels Limited (RSL)

Code of Conduct

Our Business Philosophy

Ever since the founding of our company, we have consistently maintained a strong commitment to contributing to society through our business activities, based on the firm belief that a “company is a public entity of society.” I believe that throughout our history, our products and business activities have made steady progress thanks to the great efforts made by all of our employees who have steadfastly carried out our Management Philosophy.

Currently, we are witnessing radical changes in social demands and expectations for enterprises. In addition to supplying products of excellent quality and performance, while observing laws and regulations of individual countries concerned, enterprises are expected to fulfill their corporate social responsibilities in diverse areas, ranging from global environmental preservation to product safety, labor environment, human rights protection, risk management and corporate citizenship activities. Any enterprise engaged in global businesses must maintain high ethical values and conduct its day-to-day business activities accordingly.

At Rakan Steels Limited (RSL), we must work to respond to such changing social demands and expectations through our daily efforts to carry out our Management Philosophy. To this end, each of us must sharpen our sensitivity to precisely grasp social demands and act according to what we believe is right.

This “Rakan Steels Limited (RSL) Code of Conduct,” which embodies our Management Philosophy, presents practical guidelines for employees’ day-to-day activities. I strongly ask each of you to consider the Rakan Steels Limited (RSL) Code of Conduct as your guiding principle and to conduct your daily business in compliance with the Rakan Steels Limited (RSL) Code of Conduct.

Bindu Agarwal

Director

Rakan Steels Limited (RSL)

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Scope of Application and Observance

<Scope of Application>

This *Code of Conduct* applies to all Directors, executive officers and employees of Rakan Steels Limited (RSL).

<Issuance, Adoption and Modification>

The Board of Directors of RSL issues this *Code of Conduct* and every employees and officers of RSL shall adopt this *Code*.

<Revision>

This *Code of Conduct* shall be revised in the manner described above when required by social, business or other relevant conditions.

<Director/Officer Responsible for Observance of this *Code* and Employee Education/Training>

Each Director or an executive officer is responsible for ensuring observance of this *Code of Conduct*. Also, each of them will take steps to promote employee awareness, and compliance with, company policies through appropriate explanation of these policies, including training programs.

<Violation of the *Code of Conduct*>

Violations of this *Code* will be taken very seriously.

Any member of the Board of Directors or executive officers violating the *Code* will be dealt with either by appropriate laws and regulations, or by Company regulations. An employee violating the *Code* will be dealt with according to employee regulations.

Chapter 1: Our Core Values

Our Basic Business Philosophy as the Foundation of Our Business

Our Basic Business Philosophy helps us determine our objectives, our approach to business activities, and the general direction of our company. This philosophy comprises the *Basic Management Objective*, *Company Creed* and *Seven Principles*. Together these guidelines serve as a compass, helping us set and maintain the right direction for our business. Our Basic Business Philosophy is timeless and remains valid regardless of where our business takes us.

Creation of Value and Contribution to Society

Our business primarily comprises the following integrated philosophies and processes. First, we use these resources to create value-added products and services. Finally, we make these products and services available throughout the world. The most essential of these processes is the creation of added value aimed at contributing to economic, social and environmental progress with a view to achieving sustainable development. In other words, creating value and contributing to society is our primary mission.

Close Ties with Society

Developing close and mutually advantageous relations with society is another key process. As we contribute to the continual progress of society, so our Company is also being Rakan Steels Limited (RSL) influenced by society. Our business needs both tangible and intangible support and cooperation from numerous stakeholders, including our customers, shareholders, business partners, employees and local communities. At the same time, our business activities influence those stakeholders in a variety of social, economic and environmental aspects.

An Enterprise as a Public Institution

Since our business is dependent on our customers and other stakeholders, we must remember that “an enterprise is a public institution,” that must strive to fulfill its social responsibilities. In addition to listening to stakeholders’ opinions, we must conduct our business activities transparently in order to be accountable. In short, we must continue to be fair, truthful, honest and swift in taking action to comply with our social responsibilities.

Carrying out our Basic Business Philosophy

Today more than ever great importance is being given to corporate social responsibility and business ethics. This *Code of Conduct* is designed to help us implement our Basic Business Philosophy, by providing the criteria that should be observed in individual business activities in any country. This *Code of Conduct*, however, cannot cover all possible situations. For situations not covered in the *Code of Conduct*, it is important that we always refer to the Basic Business Philosophy and determine what action to take in the spirit of that Philosophy.

Basic Management Objective

Recognizing our responsibilities as industrialists, we will devote ourselves to the progress and development of society and the well-being of people through our business activities, thereby enhancing the quality of life throughout the world.

Company Creed

Progress and development can be realized only through the combined efforts and cooperation of each employee of our company. United in spirit, we pledge to perform our corporate duties with dedication, diligence and integrity.

Chapter 2: Implementing the Code in Business Operations

1) Research and Development for a Better Future

Through research and development we aim to achieve a better future. At the same time, we will try to prevent our technologies from being used in any way that might jeopardize the global environment, world peace, social justice or humanitarian activities.

2) Developing Products People Want

We are committed to developing products that will enrich the lives of our customers by continually taking into account customers' opinions and changing societal needs and by observing how people live and interact with our products.

We will strive to develop products that provide ever increasing satisfaction to our customers based on their quality, performance, design, affordability, environmental consciousness and ease of use, and that are accessible to a wide range of people, regardless of age or ability.

3) Respect for Intellectual Property Rights

We will secure and protect intellectual property rights for our R&D achievements, while at the same time promoting the responsible use of our technologies around the world.

We will respect the intellectual property rights of others. At the same time, we will strive to prevent or eliminate any infringements of our own rights.

4) Contributing to Society

We will constantly remember that our mission is to contribute to society through manufacturing and to create added value for society. At the same time, we will continually improve the environmental performance of our manufacturing operations.

5) Safety and Quality of Products

In addition to complying with applicable laws and regulations, we will give utmost priority to product safety and continue working to maintain and further improve product quality.

6) Customer Satisfaction

Through our continual efforts to globally improve productivity and reduce costs, we will pursue the manufacture of products with the highest-level quality at reasonable price. We will develop flexible manufacturing and delivery systems in response to our customers' need for reliable and timely supply.

7) Exceeding Customers' Expectations

Whenever we meet customers, we will remember that each of us represents the Company. We will respond to customers modestly, sincerely and graciously, expressing our gratitude to them, while endeavoring to be accurate and speedy in our responses.

In particular, we will do our best to meet and exceed our customers' expectations by supplying the products and services they want and need in a timely manner and by appropriately addressing their complaints. To this end, we will properly protect all customer information.

8) Marketing Compliance

No matter how severe the competition may be, we will pursue fair and ethical marketing activities in compliance with all applicable laws and regulations. In other words, we will never violate any laws, regulations or social norms in pursuit of greater sales or profit.

We will not engage in bribery, collusion on bids, price fixing or other cartel activities.

We will take appropriate measures for export control to ensure that our products and technologies will not be misappropriated as tools that could threaten peace and security.

9) Compliance with Laws, Regulations and Business Ethics

We will conduct business with integrity, a law-abiding spirit, and the highest ethical standards.

We will fulfill our tasks by always observing not only applicable laws and regulations, but also the highest standards of business ethics. Compliance with laws, regulations and business ethics in all our business activities is essential to the survival of our business.

10) Fair and Sincere Action

We will respect free and fair competition, and abide by all applicable antitrust (competition law) and other laws and regulations. All of our transactions shall be properly and fairly recorded.

We will not engage in bribery of any kind. We will be sensitive to, and shall abide by laws and regulations and social ethics that govern the offer of benefits of any kind, including gifts, meals and entertainment. In the same manner, we will not receive personal benefits from any of our stakeholders.

Moreover, we remain steadfast in our attitude to oppose any illegal group or organization.

11) Basic Approach to Information Disclosure

We will provide our various stakeholders, including customers and shareholders, with fair and accurate information on corporate financial affairs, our Basic Business Philosophy, business policies and activities, as well as corporate social responsibility activities, in a timely, understandable and appropriate manner. At the same time, we will listen to our customers' requests and comments and reflect them in our business policies and activities. We will seek to be an enterprise with high transparency.

Chapter 3: Employee Relations

The Company will respect human dignity and strive to provide an environment that encourages employees to realize their full potential. The Company will respect each employee's personality and motivation and, in appropriate circumstances, try to offer matching opportunities in other regions. By building such mutually benefiting relations between the Company and its employees, we will carry out the Basic Business Philosophy.

1) Human Resource Development

- i) Remaining faithful to the principle, "The basis of management is people," we are committed to developing human resources with outstanding specialties, creativity and a challenging spirit, as well as to developing our own abilities through personnel systems, employee education and training.
- ii) We will respect each individual's personality and individuality, while at the same time working to maintain and improve a system that develops the diverse qualities of employees.
- iii) We will strive to act as a respectable member of society, as well as a good member of the Company, utilizing common sense and respect for others.
- iv) Managers will fulfill their tasks based on the recognition that personnel development is their most important responsibility.

2) Respect for Human Rights

- i) The Company will respect basic human rights and will work to ensure equal employment opportunities. No discrimination toward employees or others will be tolerated in speech or conduct, based on sex, age, nationality, race, ethnicity, creed, religion, social status, physical or mental disability or any other legally protected status.
- ii) The Company will not employ people against their will, and will not use child labor. The Company will comply with the employment laws and regulations of the countries and regions in which it conducts business.
- iii) Based on the full recognition that individuals are different and have different values, we will respect the privacy of each employee. We will strive to create a safe and pleasant workplace by avoiding speech or conduct that violates human rights, such as defamation, insults, sexual harassment or violent acts.

iv)The Company will give due consideration to the health of its employees and will maintain a comfortable workplace that meets all applicable safety standards.

v) Taking into account the laws and labour practices of each country, the Company will try to foster a good relationship with its employees and to resolve issues of, among others, workplace and working conditions by constantly having a sincere and constructive dialogue.

3) Corporate Asset Protection

Tangible and intangible corporate assets, including our online network and other information systems, are provided for business purposes. We will not abuse them. When employees leave the Company, they will return to the Company all corporate property in their possession, including all business-related confidential information, and related materials. Employees will not disclose to third parties any confidential information learned while performing their services, including trade secrets, without permission of the Company.

4) Conflicts of Interest

We will not engage in any action in which our personal interest conflicts or may conflict with that of the Company. Should such a conflict arise, we will report the matter to a superior or other appropriate person.

COMPLIANCE WITH CODE OF CONDUCT

Each Director and Senior Management personnel shall adhere to this code of conduct and affirm compliance with the code on an annual basis as per the requirements of Clause 49 of the Listing Agreement with the Stock Exchanges, Violation of this Code will lead to appropriate action.