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Corporate Office
Kutir Group, B/103, Ramkrupa Chs, SVP Road, Near Gokul Hotel,
Borivali West, Indusind Bank Building, Mumbai- 400092.

“Foundation to Landmark, brick by brick”

www.kutirgroup.in

Kutir Group Code of Conduct

This Code of Conduct and Ethics (the "Code") outlines the standards of behavior required of all Kutir Group employees and affiliates to ensure our business operates with the highest levels of integrity and in compliance with all applicable laws and regulations.

All employees, including full-timers, consultants, part-timers, and interns, are required to read, understand, and follow this Code. Any failure to comply will be considered a serious breach of ethical conduct. We encourage employees to report any unethical behavior, fraud, or suspected violations of this Code through the company's **Whistle Blower Policy**. All disclosures will be handled with confidentiality.

Our Principles

We expect all employees to act professionally and uphold the following principles:

- **Protect our reputation:** Conduct all interactions and dealings in a way that protects and enhances the Kutir Group's name and reputation.
- **Maintain integrity:** Uphold the highest standards of integrity in all internal and external business relationships.
- **Reject improper practices:** Never engage in any business practice that is considered improper, illegal, or not in line with this Code.
- **Avoid personal gain:** Never use your position or authority for personal gain, or for the benefit of your immediate family or friends.
- **Foster professional growth:** Encourage and develop the highest possible professional competence among those you supervise.
- **Enhance professional skills:** Continuously acquire and maintain high levels of professional skills to enhance the effectiveness of the organization.
- **Maximize company benefit:** Use company resources responsibly to provide the maximum benefit to the Kutir Group.
- **Comply with regulations:** Comply with the laws and regulations of all locations where we operate, both in letter and in spirit.
- **Fulfill obligations:** Honor all contractual obligations.



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Guidelines for Application

Personal Interests

You must avoid any situation where your private interests conflict, or could be seen to conflict, with your duties at the company. If a personal interest could affect your impartiality, you must disclose it to your immediate supervisor and Head of Department. They will then direct you on how to proceed and may prevent you from performing that specific duty.

Confidentiality

All confidential information received from clients or partners must be respected and never used for personal gain. Information should be shared in a clear, honest, and non-misleading manner. Do not disclose company information (e.g., strategic plans, business models, investment decisions) or client-specific confidential information (e.g., expansion plans, product pricing) to unauthorized third parties.

Competition

Treat all competitive clients equally, as company policy permits. All contracts and business relationships must be structured to ensure benefits and deliverables for the company. Avoid any arrangements that could prevent fair competition.

Business Gifts & Hospitality

To avoid any perception of improper influence:

- **Gifts:** Do not solicit or accept any gifts, remuneration, or benefits for yourself or your family. You may accept items of very small intrinsic value, such as pens, calendars, or diaries, but these items must be usable in your normal place of work and include the provider's name or logo. The value should not exceed the cost of a typical business lunch.
- **Hospitality:** You should not allow yourself to be influenced by hospitality. The frequency and scale of any hospitality should be managed openly and carefully. The value of any hospitality you accept should not be greater than what your company could reasonably reciprocate.

Transparency & Traceability

All significant business decisions, meetings, and important phone calls with clients must be documented and circulated through established communication channels (e.g., email, documents). For any business decision, a document must be created and filed according to company policy. This document should detail the technical and financial factors that influenced the decision, as well as the opinions and authorizations that led to it.



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Seeking Advice

If you are unsure whether a situation is acceptable, you should seek advice from your supervisor, manager, Head of Department, or another senior colleague.

This Code of Ethics applies to all employees and must be followed by all company personnel who have contact with employees.