ORIENT BEVERAGES LIMITED

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CIN : L15520WB1960PLC024710

CODE OF CONDUCT FOR ALL DIRECTORS AND SENIOR MANAGEMENT

Adopted on	Revised Date	Approved by	Date of Approved
14.08.2026	-	Board	14.08.2026

CODE OF CONDUCT FOR DIRECTORS AND SENIOR MANAGEMENT

Introduction

Orient Beverages Limited ("the Company") is committed to conducting its business with integrity, transparency, fairness, and in compliance with all applicable laws and regulations. The Company believes that ethical business practices and responsible corporate governance are essential to protecting and enhancing shareholder value while safeguarding the interests of employees, customers, business partners, and other stakeholders.

This Code of Conduct ("Code") has been adopted by the Board of Directors in accordance with the provisions of the Companies Act, 2013 and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR"), as amended from time to time.

The purpose of this Code is to establish the standards of ethical conduct expected from all Directors and members of Senior Management while performing their duties and responsibilities.

Definitions

For the purpose of this Code:

- Board means the Board of Directors of the Company.
- Director means a Director of the Company, including an Independent Director.
- Senior Management shall have the meaning assigned under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and shall include officers and personnel designated by the Board or the Managing Director from time to time.
- Company means Orient Beverages Limited.

Applicability

This Code shall apply to:

- All Directors of the Company, including Independent Directors.
- All members of the Senior Management.

Every person covered under this Code shall comply with its provisions in letter and spirit.

Standards of Conduct

Every Director and member of Senior Management shall:

i. Compliance with Laws:
Comply with all applicable laws, rules, regulations, statutory requirements, and Company policies while discharging their duties.

ii. Integrity and Ethical Conduct:
Conduct themselves honestly, fairly, responsibly, and with integrity in all business dealings and avoid any conduct that may adversely affect the reputation or interests of the Company.

iii. Conflict of Interest:
Avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company. Any actual or potential conflict of interest shall be promptly disclosed in writing to the appropriate authority. Directors shall disclose such conflicts to the Board of Directors.

iv. Protection of Company Assets:
Protect and use the Company's assets, funds, property, information systems, and intellectual property responsibly, efficiently, and only for legitimate business purposes.

v. Confidentiality:
Maintain the confidentiality of all proprietary, strategic, financial, technical, and other non-public information acquired during the course of employment or directorship. Confidential information shall not be disclosed except where authorized by the Company or required by applicable law.

vi. Financial Integrity:
Ensure that financial records, books of accounts, reports, and disclosures are accurate, complete, transparent, and prepared in accordance with applicable accounting standards and legal requirements.

vii. Insider Trading:
Strictly comply with the Company's Code of Conduct for Prevention of Insider Trading and shall not trade in the Company's securities while in possession of unpublished price sensitive information.

viii. Fair Competition:
Conduct business fairly and ethically and comply with applicable competition and antitrust laws. Unfair trade practices or anti-competitive conduct shall not be tolerated.

ix. Equal Opportunity and Respect:
Promote a workplace based on dignity, respect, diversity, and equal opportunity.
No person shall engage in discrimination, harassment, bullying, intimidation, or retaliation on the basis of gender, religion, caste, race, ethnicity, age, disability, or any other characteristic protected under applicable law.

x. Health, Safety and Environment:
Support and maintain a safe, healthy, secure, and environmentally responsible workplace and comply with all applicable health, safety, and environmental laws.

xi. Corporate Opportunities:
Directors and members of Senior Management shall not exploit for personal benefit any business opportunity discovered through the use of Company property, information, or position.

xii. Political Contributions:
No political contribution shall be made on behalf of the Company, directly or indirectly, unless specifically approved by the Board of Directors and permitted under applicable law.

xiii. Public Communications:
No Director or member of Senior Management shall make any public statement or communicate with the media regarding the Company's affairs unless authorized by the Board, the Managing Director, or any person specifically designated by the Company.

xiv. Protection of Company Interests:
No Director or member of Senior Management shall knowingly suppress, conceal, or misrepresent any material information that may adversely affect the interests of the Company or its stakeholders.

xv. Respect for Human Values:
Every Director and member of Senior Management shall uphold human dignity, respect individual rights, and foster a culture of mutual trust, professionalism, and ethical conduct.

Compliance with Company Policies

Every Director and member of Senior Management shall comply with all policies adopted by the Company, including but not limited to:

- Code for Prevention of Insider Trading.
- Vigil Mechanism/Whistle Blower Policy.
- Any other policies adopted by the Company from time to time.

Reporting of Violations

Any suspected violation of this Code shall be reported promptly through the Company's approved reporting mechanism or to the Chairperson of the Board, Managing Director, Company Secretary, or the Audit Committee, as applicable. No person reporting a genuine concern in good faith shall be subjected to retaliation.

Consequences of Non-Compliance

Violation of this Code may result in disciplinary action, including removal from office, termination of employment, recovery of losses, or any other action permitted under applicable law and Company policies.

Annual Affirmation:

All Directors and members of Senior Management shall affirm compliance with this Code annually in such form as may be prescribed by the Company.

Review and Amendment:

The Board of Directors reserves the right to amend, modify, or revise this Code from time to time to ensure compliance with applicable laws and evolving standards of corporate governance.

Effective Date:

This Code shall come into effect from the date of its approval by the Board of Directors and shall remain in force until amended or replaced by the Board.

For Orient Beverages Ltd.

N. K. Poddar
Chairman

Dated: 14.08.2026