

CODE OF CONDUCT FOR SENIOR MANAGERS OF EQUITAS

Code of Conduct for Senior Managers:

The Senior Managers in consideration of their employment with the Company are expected to devote their full time and attention to the business interests of the Company. The Company expects all Senior Managers to act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct while discharging their duties. Accordingly, Senior Managers are expected to read and understand this Code, uphold these standards in day to day activities, and comply with, all applicable laws, rules and regulations, and all applicable policies and procedures adopted by the Company that govern conduct of its employees. Senior Managers should sign the acknowledgement at the end of this Code and return the same to HR department that they have received, read and understood and agree to comply with the Code

Senior Manager will always:

1. act in the best interests of the Company;
2. act honestly, fairly, ethically and with integrity;
3. not use the Company's property or position for personal gain
4. not use any information or opportunity received by them in their capacity as Senior Manager in a manner that would be detrimental to the Company's interests;
5. comply with all applicable laws, rules and regulations

A Senior Manager who has concerns regarding compliance with this Code should raise those concerns with the Managing Director, who will determine what action, shall be taken to deal with the concern.

Senior Manager's duty demands that he or she should avoid and disclose actual and apparent conflicts of interest.

For this purpose "Senior Management" shall mean members of management one level below the Executive Directors and shall include all functional heads.

I hereby confirm compliance to the Code of Conduct for Senior Managers of the Company

Name

Designation

Place:

Date: