



# Datum Conflicts of Interest Policy

VERSION 1.0

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## DATUM COMPANY POLICY

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# 01

## SCOPE AND PURPOSE OF THIS POLICY

### TO WHOM DOES THIS POLICY APPLY?

This Conflicts of Interest Policy applies to all employees, officers, directors, and contractors of Datum Advanced Composites Private Limited (hereinafter referred to as "Datum" or the "Company"). It is imperative that all individuals subject to this policy adhere to its guidelines and principles.

### PURPOSE OF THIS POLICY

The purpose of this policy is to outline the guidelines and expectations regarding conflicts of interest within Datum. Datum recognizes that conflicts of interest may arise when an individual's personal interests or obligations interfere with their responsibilities to the Company. This policy aims to identify, prevent, and address such conflicts to protect the integrity, reputation, and best interests of Datum.

# 02

## POLICY OVERVIEW

Datum is committed to maintaining the highest standards of integrity and ethical conduct in all our business activities. To ensure that we act in the best interests of our company and our stakeholders, it is imperative that all employees, contractors, and associates avoid situations and outside business activities that could lead to conflicts of interest.

### KEY PRINCIPALS

**Disclosure:** All individuals subject to this policy are required to promptly disclose any actual or potential conflicts of interest or outside business activities to the designated responsible authority.

**Resolution:** Datum is committed to resolving conflicts of interest in a fair and transparent manner, prioritising the Company's interests.

**Compatibility:** Outside activities must be compatible with employees' obligations at Datum and not compromise the Company's interests.

**Prior Approval:** In certain cases, prior approval may be required for employees to engage in specific outside business activities.

**Avoidance of Inappropriate Influence:** Individuals must avoid situations where their personal interests may inappropriately influence their business decisions on behalf of Datum.

### DO

- △ Promptly disclose any actual or potential conflicts of interest to the Company.
- △ Seek prior approval from the designated authority for outside activities.
- △ Cooperate with Datum's conflict resolution processes.
- △ Act in the best interests of Datum in all internal and outside business dealings.

### DON'T

- △ Engage in any activities or transactions that could compromise Datum's best interests.
- △ Use your position within Datum for personal gain or to benefit individuals or organisations.
- △ Engage in outside activities that could adversely affect your performance, commitments, or loyalty to Datum.
- △ Participate in external activities that involve a direct conflict with Datum's business interests.

# 03

## POLICY GUIDELINES

### DISCLOSURE OF INTERESTS

All employees, contractors, and associates must promptly disclose any financial, personal, or other interests that could create or appear to create a conflict with the interests of Datum Advanced Composites.

### REVIEW AND ASSESSMENT

The company will assess disclosed interests to determine whether they present a conflict of interest or could impact outside business activities. An independent review committee, appointed by the management, will be responsible for evaluating and managing potential conflicts.

### MITIGATION MEASURES

If a conflict of interest is identified, the committee will establish mitigation measures to ensure that the best interests of Datum Advanced Composites are not compromised. These measures may include recusal from decision-making, divestiture of conflicting interests, or other appropriate actions.

### OUTSIDE BUSINESS ACTIVITIES

All employees and contractors must obtain prior written approval from Datum before engaging in any outside business activities, whether as an employee, consultant, or business owner. Datum will assess the potential for conflicts of interest with outside activities and may withhold approval if conflicts are identified.

## **NON-COMPETE AND PROPRIETARY INFORMATION**

Employees and contractors are prohibited from engaging in outside business activities that compete directly or indirectly with Datum's business. Furthermore, they are expected to protect and not disclose Datum's proprietary information.

## **TIME AND EFFORT**

Employees must ensure that their outside business activities do not interfere with their responsibilities, time, or commitment to Datum.

## **REGULAR REPORTING**

Those engaged in approved outside business activities are required to provide regular reports on the nature of their involvement, any potential conflicts, and time allocation.

# 04

## CONSEQUENCES OF VIOLATION

Failure to adhere to this Conflict of Interest Policy may result in disciplinary actions, up to and including termination of employment or contractual relationship. Additionally, legal action may be taken if the violation results in financial harm to Datum Advanced Composites or breaches of confidentiality. Employees and contractors should be aware of their obligations under this policy and seek guidance when in doubt.

# 05

## FREQUENTLY ASKED QUESTIONS

### What constitutes a conflict of interest?

A conflict of interest arises when an individual's financial, personal, or other interests could create or appear to create a conflict with the interests of Datum Advanced Composites. This includes situations where personal interests may compromise the impartiality and objectivity of business decisions.

### How do I disclose potential conflicts of interest?

All employees, contractors, and associates are required to promptly disclose any potential conflicts of interest in writing to the Human Resource Executive. This disclosure should include a description of the conflict and steps taken to address it.

### Who assesses and manages conflicts of interest?

An independent review committee, appointed by the Senior Leadership, is responsible for evaluating and managing potential conflicts of interest. The committee will determine appropriate mitigation measures.

### Can I engage in outside business activities while working at Datum?

Yes, you can engage in outside business activities with prior written approval from Datum. The company will assess whether there are conflicts of interest between your outside activities and your role at Datum.

### What types of outside business activities are prohibited?

You are prohibited from engaging in outside business activities that compete directly or indirectly with Datum's business and the businesses of its customers, suppliers and partners. This includes activities that could harm Datum's interests or proprietary information.



### How do I obtain approval for outside business activities?

To obtain approval for outside business activities, you must submit a request in writing to the Human Resource Executive. The request should include details about the outside business, its nature, and its potential impact on your role at Datum.

### What are the consequences of violating this policy?

Violation of this policy may result in disciplinary actions, which can include termination of employment or contractual relationship. Additionally, legal action may be taken if the violation results in financial harm to Datum Advanced Composites or breaches of confidentiality.

### Are there any reporting requirements for those engaged in approved outside business activities?

Yes, those engaged in approved outside business activities are required to provide regular reports on the nature of their involvement, any potential conflicts, and the allocation of their time between their activities at Datum and outside business activities.

### Where can I seek further clarification or guidance on this policy?

If you have questions or need further clarification on this policy, please reach out to the Human Resource Executive within the company. We are here to assist you in understanding and complying with the policy.

#### Key Reference Documents

- △ Datum Global Code of Conduct
- △ Datum Employee Handbook
- △ Datum Annual Declaration Form

#### Key Contacts

- △ Line Manager
- △ Human Resource Executive
- △ Head of Legal and Compliance
- △ Datum Senior Leadership

# DATUM



## ADVANCED COMPOSITES

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