



CODE OF CONDUCT

Mission Statement

Our mission is to be the leading solution provider of office equipment, refrigeration, security and hospitality products in western India and the markets we serve.

By investing in our people and our products, we are committed to providing superior value and service to our customers.

Vision

Employees

To create a seamless organization that incubates and promotes excellence and the Lynx core values. Sparks engagement, broadens the business acumen and nurtures growth.

Customers

To strengthen the Lynx brand and create lasting relationships with the customers by providing an unrivalled total and amazing customer experience, which breeds pride and loyalty.

Serve their needs and widen their business horizons with outstanding solutions, products and services.

Suppliers

To foster a long-term relationship so as to introduce a broad range of innovative products and services, that would benefit our customers and other stakeholders. Build rewarding partnerships, which allow our respective businesses to prosper.

Investors and shareholders

To consistently create shareholder value by generating growth for sustained return on investment.

Communities

To proactively participate in providing an exciting and fulfilling source of employment and contribute to economic growth.

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MESSAGE FROM THE CHAIRMAN AND CEO

This Code of Ethics and Business Conduct explains the standards of behaviour that Lynx expects of you in your daily activities and dealings with others. The Code cannot foresee every situation that might arise.

Rather, it identifies guiding principles to help you make decisions consistent with Lynx's values and reputation. When a company practices and promotes ethical behaviour, everyone benefits. Being honest, forthright and consistent in our dealings with others fosters a positive work environment. A company that prides itself on integrity inspires confidence in employees, customers, shareholders, suppliers and the wider community.

In an era when public trust and confidence in business are among the lowest levels in history, ours is a company that is built on this trust and this reputation for the last 25 years. It influences how consumers feel about our products and our services, and how shareholders perceive us as an investment.

Because our success is so closely related to our reputation, it's up to all of us to protect that reputation. Keep the Code with you and refer to it often. Stay current with your ethics training. When you have questions, ask for guidance.

Ultimately, it's about each of us knowing that we've done the right thing. Nothing is more important to Lynx, to me personally.

Our rules and values guarantee our future. I rely on each and every one of you, individually and collectively, to ensure all our rules are respected on a daily basis.

- Mangal Trivedi

WHO MUST FOLLOW THE CODE

This Code applies at all times, without exception, to all members of the Board of Directors and all Lynx employees. Lynx suppliers and partners, as well as third parties (such as agents), are also expected to adhere to the Code when dealing with or acting on behalf of Lynx.

WHICH LAWS APPLY

Lynx and its employees must obey the law in each of the territories where the Company operates. If a conflict should arise the matter should be brought to the notice of the concerned supervisor.

COMMITTING TO THE CODE

Where applicable, newly-hired employees must sign an acknowledgment that they have read and understood the Code. Designated members of senior management are also required to annually sign an acknowledgement stipulating not only that they have read and understood the Code, but also that they have neither breached nor are aware of any breach of the Code's provisions.

POLICIES AND PROCEDURES OF THE COMPANY

Each division issues its own set of policies and procedures, in line with Lynx's corporate policies. Employees have an obligation to follow those policies and procedures in addition to those described in this Code.

OUR RESPONSIBILITIES

The key responsibilities associated with this Code are understanding and compliance.

The Code makes Lynx's expectations of employees and management clear and explicit.

EMPLOYEES

As an employee, you are expected to:

Assume personal responsibility for performing your duties with fairness and integrity; agree to do your part to achieve Lynx's objectives to the best of your abilities, while making decisions consistent with the Code, and without compromise; have a basic understanding of the Code and review it from time to time. You should also have a detailed knowledge of its provisions that apply specifically to your job; If you become aware of a possible violation of the Code, you are expected to: act promptly and in good faith by raising it with your supervisor.

MANAGEMENT

Where applicable, newly-hired employees must sign an acknowledgement that they have read and understood the Code. Designated members of senior management are also required to annually sign an acknowledgement stipulating not only that they have read and understood the Code, but also that they have neither breached nor are aware of any breach of the Code's provisions.

LYNX CORE VALUES

All Lynx policies, including this Code, stem from our Core Values. These common values must therefore inspire all our actions and decisions and provide a benchmark for everyone.

INTEGRITY & HONESTY

We behave with integrity and in an ethical manner in everything we do and say, thereby earning and maintaining the trust and respect of customers, suppliers, colleagues, partners, shareholders and communities.

COMMITMENT TO EXCELLENCE

Our commitment is to demonstrate excellence in all spheres of our work and in our interactions with customers, suppliers, colleagues, partners and communities. In addition, we commit to exercising judgment, professionalism, rigour, self-discipline, perseverance, cooperation and team spirit.

CUSTOMER ORIENTATION

We promote a customer-centered culture that emphasizes outstanding service and meets our commitments at every level of our organization.

PROFITABLE GROWTH

Growth is the lifeblood of our organization. Profit also enables us to grow. If what we're doing is good, we need to grow so that we do more good. Without profits, even dramatic growth becomes unsustainable.

GRATITUDE

We will act out of a sense of gratitude for all the benefits we have received, confident that this attitude will be a source of unbounded joy and vitality, enabling us to overcome any obstacles we encounter.

CODE OF ETHICS AND BUSINESS CONDUCTS

The Lynx Code addresses ethical conduct in relation to the work environment, business practices and relationships with external stakeholders.

WORK ENVIRONMENT

Employment Practices

Lynx treats all employees fairly, ethically, respectfully and with dignity. The company offers equal employment opportunities without regard to any distinctions based on age, gender, sexual orientation, disability, race, religion, citizenship, marital status, family situation or other factors, in accordance with the laws and regulations.

Harassment and Personal Security

Lynx policies protect employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse. As an employee, you are entitled to, and are expected to preserve, a positive, harmonious and professional work environment.

Health, Safety and the Environment

The occupational health and safety of employees and environmental protection are priorities at Lynx, where they are regarded as a fundamental corporate social responsibility. Lynx and its employees comply with all applicable laws and regulations. We adopt standards, procedures, contingency measures and management systems to ensure that our operations are managed safely, ecologically and in a sustainable way. To protect their own safety as well as that of their colleagues and communities, employees undertake not to work under the influence of any substance that could impair their judgment or interfere with the effective and responsible performance of their duties.

BUSINESS PRACTICES

Company Property

Company property should only be used for legitimate business purposes. Lynx employees are expected to take good care of company property and not expose it to loss, damage, misuse or theft.

Intellectual Property

Intellectual property comprises trademarks, domain names, patents, copyrights and trade secrets. Employees have a duty to protect Lynx's intellectual property, just as they have the obligation to respect that of others.

Books and Records

Lynx's books and records are complete, fair and accurate and comply with all legal reporting requirements. Supported by Lynx's systems of internal controls, they reflect all assets, liabilities, transactions and events and conform to required accounting principles. Lynx employees manage, store, archive and dispose of books and records—both print and electronic—according to established policies and legal requirements.

Communications

As a Lynx employee, you should be truthful and Straight forward in your dealings and not intentionally mislead colleagues, customers or suppliers. Use appropriate, professional language, both in written documents and public conversations. Communications with the media, the investment community and regulators are the responsibility of designated Corporate spokespersons. Inquiries received by an employee must be referred to an authorized spokesperson.

Electronic mail and Phone usage

Lynx's electronic mail and Internet systems are provided for business use. When using electronic mail, you should remember that it is susceptible to interception, creates a permanent record, can be printed or forwarded to others by the recipient and will likely be retained on the recipient's computer for a long time. Therefore, exercise the same care in sending electronic mail as in other written business communications. Never use Lynx's Internet connection or computer equipment to access, transmit or download content that is inappropriate and does not meet business requirements.

Confidential Information

Depending upon the job role, some employees may be provided data cards for their work duties. On resigning from the company, any such cards issued to an employee need to be returned to Lynx, failing which the company reserves the right to make necessary adjustments based on current prices at the time of final settlement.

Conflicts of Interest

Avoid conflicts of interest, whether real or perceived, in the performance of your duties. A conflict of interest is considered to be any situation or arrangement where your personal activities or interests conflict with your responsibilities to Lynx.

Do not put yourself in a position where there is or could be an obligation to any third party who might benefit from such situation at the expense of Lynx. Your actions must never lead to personal gain to the detriment of Lynx's stated business interests. Situations of conflict of interest can also arise when you take on outside work that could compromise the diligent performance of your duties for Lynx. Should such a situation arise, you are encouraged to discuss it with your supervisor.

RELATIONS WITH EXTERNAL STAKEHOLDERS

Customers

Lynx is committed to meeting the needs of its customers and strives to provide high-quality services and products. In customer relationships, employees behave in an ethical fashion. Sensitive, private or confidential customer information is safeguarded according to Lynx's standards, with access restricted to those who have a need to know.

Suppliers, Partners and Third Parties

Lynx suppliers, partners and other third parties must know and agree to comply with the Code. All agreements with suppliers, partners and third parties must be in writing and must specify the goods and services to be provided and the fees to be paid. Such agreements must be in line with reasonable competitive and market practices, the principles established in this Code and relevant corporate policies.

REPORTING VIOLATIONS

Any individual in the employ of Lynx, or any customer, supplier, partner or other third party, who becomes aware of a possible violation of the Code, or of a violation of the law by the Corporation or any of its employees, has an important duty to report it. While it is natural to have misgivings about raising such a concern, you are strongly encouraged to do so, as remaining silent could have serious negative consequences for the Company.

PENALTIES FOR VIOLATIONS

Failure to respect the letter or the spirit of the Code or the law may lead to disciplinary measures commensurate with the violation, including termination of employment. Employees who break the law expose both themselves and the Company to criminal penalties (such as fines and jail sentences) or civil sanctions (such as damage awards or fines).

