



Nagata Group (India Operations)

Comprising

Nagata India Pvt. Ltd.

Nagata Auto Engineering India Pvt. Ltd.

CODE OF CONDUCT

行動規範

ナガタグループ(インド事業)

網羅

ナガタインディア株式会社

ナガタオートエンジニアリングインド株式会社



Bilaspur, Haryana

Sadatpura, Gujarat



Nagata Group (India Operations)

IMT Manesar, Haryana

Luhari, Haryana

CODE OF CONDUCT



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FOREWORD

Nagata Group (India Operations), comprising Nagata India Pvt. Ltd. and Nagata Auto Engineering India Pvt. Ltd. has a history of conducting business responsibly, transparently and ethically. We will continuously strive to live up to the highest ethical standards we have set for ourselves and comply fully with all the relevant laws and regulations, wherever we operate.

The Code of Ethics & Business Conduct is intended to serve as a guide to each employee on the values, ethics and business principles expected to be followed in personal and professional conduct. As an employee of Nagata Group India Operations, each employee is committed to ensure that they understand and abide by or conduct themselves as per the guidelines laid down in the Code.

I urge each employee to read and follow the Code of Ethics & Business Conduct and take pride in upholding the highest standards of corporate and personal behavior.

Mittul Soni
Managing Director

Dated : Feb, 2025

1. PREAMBLE

- 1.1. We conduct our business within the framework of applicable professional standards, laws, and regulations together with **Nagata Group (India Operations)** policies and standards. **Nagata Group (India Operations)** expects all its employees to act in accordance with these standards.
- 1.2. Our Code of Conduct sets forth our core values, shared responsibilities, commitments, and promises. It provides general guidance about the Company's expectations, highlights situations that may require particular attention, and references additional resources and channels of communication available to us. It is also the first step for you to get clarity on any questions relating to ethical conduct.
- 1.3. In accepting a position with us, you become accountable for compliance with the law, with the Company's Code of Conduct and Ethics, and with the policies of your respective business units.
- 1.4. Each of us has an obligation to know and understand the guidelines contained in the Code. We also have an obligation to comply with the letter and spirit of this Code and to help others do the same.
- 1.5. While the Code provides a broad range of guidance about the standards of integrity and business conduct, it cannot address every situation that individuals are likely to encounter. As a result, this Code is not a substitute for our responsibility and accountability to exercise good judgment. Even well intentioned actions that violate the law or this Code may result in negative consequences for the Company and for the individuals involved.
- 1.6. As individual employees are encouraged to express our concerns and raise any issues through the channels defined in the Whistleblowing policy annexed as Annexure - 2. We are committed to protecting individuals against retaliation.

Each of us is responsible for our own actions and the ethical choice is always the best choice.

The Code is by no means a substitute for our good judgment.

2. PURPOSE

Nagata Group (India Operations) (hereinafter referred to as 'the Company') has always promoted high ethical standards of professional and personal conduct by its employees and business associates. The purpose of laying down the Code of Conduct & Ethics (hereinafter referred to as 'the Code') is to improve overall compliance as well as to enhance further scope of good Corporate Governance with an ethical and transparent process in managing the affairs of the Company.

3. APPLICABILITY

- 3.1. Expectation of Organization from Organizational Members** - All are expected to conduct their business dealings honestly, openly, fairly, diligently, and courteously and in a manner that enhances the image of the Company. The Company expects its managers and supervisors to lead by example and perform their duties in accordance with this Policy and ensure that the content of this Policy is communicated to all people reporting to them.
- 3.2. Awareness to Employee** - In addition to employees, the Company will create awareness about the Code and shall use its best endeavors to influence compliance of the same among all vendors, suppliers, agents, intermediaries, contractors & sub-contractors, consultants, partners, and other business associates of the Company (collectively referred as 'Third Party').
- 3.3. Applicability**- The Code will be applicable to all employees (full-time) including trainees.

**Employees are the Ambassadors of our
Code of Conduct**

3.4. Employee i.e., Organizational Member's RESPONSIBILITIES:

- 3.4.1 A commitment to and adherence to **professional standards and code at work** and in interactions with other Employees of the Company.
- 3.4.2 A commitment to maintaining **the highest standards of integrity and honesty** in and at work.
- 3.4.3 Adherence to **ethical and legal standards** to be maintained in business.
- 3.4.4 A responsibility to support the Company in its efforts to create an **open and mutually supportive environment**.
- 3.4.5 A responsibility to set an example to subordinates through own work capability and performance, through **leadership** and by taking account the needs and problems of subordinates.
- 3.4.6 A responsibility to **train people** as appropriate and enable them to become qualified for higher duties.
- 3.4.7 A responsibility to **uphold and further the reputation** of the organization.
- 3.4.8 A responsibility to direct all available effort towards the **success of the enterprise** rather than of himself.
- 3.4.9 A responsibility to ensure that there **is no misrepresentation of facts**. Wherever a misunderstanding is thought to have taken place, this should be corrected promptly between the concerned parties.
- 3.4.10 A responsibility to **communicate a positive message** about commitment to ethics and compliance and encourage people to speak up against violation.
- 3.4.11 A responsibility to **listen and respond fairly** to employee concerns.
- 3.4.12 A responsibility to **Embracing corporate social responsibility**, to engage in community service and charitable activities to foster positive impact beyond our business operations.”

DO's:

- FOLLOW THE CODE
- LEAD BY EXAMPLE
- BE EXAMPLE FOR TEAM AND CO- WORKERS

DON'T:

- DO NOT be irregular or unpunctual.
- DO NOT be absent from work without leave.
- DO NOT neglect work including negligence in performance of duty and malingering or slowing down.
- DO NOT be absent from your appointed place of work without permission or sufficient cause.

3.4.13 Ethics in Business: Trust, Honesty & Integrity: The Company expects its employees to perform their duties with honesty, integrity and to the best of their ability. Employees should be honest, fair and trustworthy in all business relationships.

Every employee needs to demonstrate trust and respect in dealings with other colleagues in the organization as well as in their dealings with external parties. Distrust of colleagues / external parties and disrespectful behavior shown by employees is strongly discouraged and will not be tolerated.

3.4.14 Zero Tolerance towards Bribery and Corruption: The Company follows zero tolerance approach towards bribery and corruption. This includes any payments made by employees, consultants, agents, and other intermediaries acting by or on behalf of the Company for conduct of business in any unethical manner. The Company maintains a zero-tolerance policy towards bribery and corruption to ensure the highest standards of ethical conduct in all business activities. This includes any payments, gifts, or favors made by employees, consultants, agents, and intermediaries acting on behalf of the Company. Engaging in bribery, offering or accepting kickbacks, or any form of corrupt practice is strictly prohibited. This includes attempts to influence decisions, secure business advantages, or manipulate outcomes in an unethical manner. The Company is committed to conducting business with integrity and expects all representatives to uphold these principles without exception.

Do's and Don'ts

Do's:

While managing third party and customer relationships, employees must be on the watch for any actions relating to bribery, kickbacks, improper payments, or other corrupting influences.

Don't:

- a) Offer, give, solicit, or receive directly or indirectly any form of bribe, kickback, or improper inducement even where the practice is considered “a way of doing business”.
- b) Use intermediaries, such as agents, subcontractors, consultants and other third parties, to channel inappropriate payments to government officials or individuals and entities associated with them.

3.4.15 Gifts & Donations - Receiving expensive gifts or entertainment from suppliers, potential suppliers or customers is against the Company's policy.

Do's and Don'ts

Do's:

- a) A company and its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given as in the case of marriage, festive occasions etc. and are of a commemorative nature.
- b) Certain token gifts of nominal value (less than INR 2000.00) may be accepted from time to time. e.g., pen, stationary, organizer, calendar, Dry Fruits, Chocolates and Sweets.
- c) Any gifts thus accepted must be communicated to the management and the gift must be deposited with the Administration department.
- d) Some business entertainment or social activity with business associates may be appropriate and beneficial to the company when undertaken with discretion. In Such cases, the Employee may pay for all such costs post written approval from Reporting Manager and claim reimbursement for the same.
- e) Invitations to occasional lunches / dinners hosted by our business associates may be accepted, if it serves the purpose of enhancing the relationship, after informing the immediate superior.

Don'ts:

- a) Receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations, or comparable benefits that are intended, or perceived, to obtain uncompetitive favors for the conduct of business.
- b) Accept offers to be entertained by an individual or organization with whom the Company transacts business.

3.4.16 Fraud/ Fraudulent behavior: Fraud or the act or intent to cheat, trick, steal, deceive, or lie - is both dishonest and, in most cases, criminal. Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible civil and/or criminal action against the concerned Employee.

Some examples of Fraud include:

- a) Submitting false expense reports.
- b) Forging or altering checks.
- c) Misappropriating assets or misusing Company's property.
- d) Unauthorized handling or reporting of transactions.

- e) Inflating sales numbers by shipping inventory known to be defective or non-conforming.
- f) Making any entry on Company records or financial statements that is not accurate and in accordance with proper accounting standards.
- g) Making any entry on product inspection records that is not accurate and in accordance with appropriate design standards.

3.4.17 Conflict of Interest: A Conflict of Interest occurs when personal interests of an employee or the interests of a third party compete with the interests of the Company. The term “conflict of interest” describes any circumstances/situation in which a person is able to derive personal benefit from actions or decisions made in their official capacity.

Do's and Don'ts

Do's:

- a) Avoid situations involving actual or potential conflict of interest so that even the slightest doubt on integrity is not raised.
- b) In a Conflict-of-Interest situation, disclose the situation to the immediate Reporting Manager or approach the “Compliance and Ethics” Officer or Use any of the Compliance Communication Channels mentioned in the policy herein.

Don'ts:

- a) Misuse office or authority that comes with the office for personal gains.
- b) Involved in any arrangement which might discourage you from acting in the best interest of the Company.
- c) Act as a broker or on behalf of a third party in transactions involving or potentially involving the company.
- d) Have any financial interest in any outside enterprise which is currently doing business or seeks to do business with or is a competitor of the Company.
- e) Take full time or part time assignments with any competitor company or company with similar line of business during the tenure with the Company.
- f) Be the final decision maker for any business contract or arrangement with any organization wherein relatives/close friends are employed in key positions. In such an event, refer the matter to the superior, clearly informing his/her superior of his/her relationship with key personnel in the concerned organization.
- g) Solicit or promote any personal/public cause or organization/ association during working hours within office premises.
- h) Involve in any financial transaction with colleagues, customers or suppliers that would create conflicts of interest.

3.4.18 Regulatory Compliance: It is the Company's policy to comply fully in letter and in spirit with all applicable laws, rules and regulations. Employees too are expected to comply at all times with all applicable laws and regulations. The Company will not condone the activities of any employees who violate the law or engage in unethical business practices, regardless of whether an unlawful act is motivated "in the interests of the company" or "in the interests of the customer".

Do's and Don'ts

Do's:

- a) In case of ambiguity of the laws or their interpretation, legal advice should be sought. The employee is required to refer the matter to his/her Reporting Manager in case of any confusion.
- b) Train and create awareness on the various compliances matters where employees are involved.
- c) Adopt shortcuts or create data to ensure compliance.

Don'ts:

- a) **Government agencies:** Nagata Group (India Operations) and its employees shall not, unless mandated under applicable laws, offer, or give any company funds or property as donation to any government agency or its representative, directly or through intermediaries, to obtain any favorable performance of official duties. The company shall comply with government regulations and shall be transparent in all its dealings with government agencies.
- b) **Political non-alignment:** Nagata Group (India Operations) shall be committed to and support the constitution and governance systems of the country in which it operates. It shall not support any specific political party or candidate for political office. The company's conduct shall preclude any activity that could be interpreted as mutual dependence / favor with any political body or person and shall not offer or give any company funds or property as donations to any political party, candidate or campaign.

4. RESPECTING EACH OTHER

- 4.1. An Equal Opportunities Employer:** At Nagata, we are committed to following fair employment practices and we strive to provide equal opportunities to all its employees and reward them based on their merit (performance and potential) and business needs without discrimination against their race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, or disability. Human resource policies shall promote diversity and equality in the workplace, as well as compliance with all local labor laws, while encouraging the adoption of international best practices. Employee policies and practices shall be administered without any bias.

4.2. Diversity and Inclusion: We actively foster a workplace that values diversity and inclusion. We believe that a diverse workforce enhances innovation, creativity, and our ability to meet the needs of our clients and communities. Our policies promote a culture where differences are respected, and all employees are treated fairly and equitably.

Do's and Don'ts

Do's:

Ensure that decisions affecting employees are based on business factors only. For instance, decisions regarding hiring, promotion, termination, transfer, leave of absence or compensation should only be based on merit and relevant business factors.

Don't:

Discriminate against each other based on any personal prejudices or biases.

4.3. Relationships at Work: Nagata Group (India Operations) encourages employees to invite their friends to be a part of the Company and supports friends and acquaintances working in the organization as it attempts to hire highly skilled Talent.

Do's and Don'ts

Do's:

- a) Personal or romantic involvement with a colleague, Customer, supplier, or another employee of the Company might affect the ability to exercise good judgment on behalf of the Company. Personal relationships and romantic liaisons between employees who are in a manager-employee reporting structure may lead to team management challenges and reduced morale. All such relationships must be disclosed to the manager immediately.
- b) Treat the people, both within and outside, with respect and in a manner that their self-esteem and dignity are always maintained.
- c) Employees must declare any blood relations or family members employed within the organization.

Don'ts:

- a) Related Employees shall not report within the same organizational line (no direct reporting relationship whereby, one would be under direct supervision of the other within the same department) or where there is a significant sphere of influence (a situation where one relative, although in a different reporting line, still could have significant influence over the other relative).

CONDUCT not aligned to our

- Values:
- Harassing
- Bullying
- Abusive or intimidating treatment
- Inappropriate language or gestures,
- Disorderly conduct,
- Violence and
- Any other conduct that interferes with a co- worker's ability to do his or her job.

- 4.4. **Enabling Work Environment:** The Company seeks to create an enabling work environment providing for continuous learning, recognition, and reward of individual and team for performance and contributions.

Do's and Don'ts

Do's:

- a) Employees shall work together in a collaborative manner as a well-knit team towards the achievement of business goals.
- b) Employees shall work in a manner that is open, honest, straightforward, and fair, respectful of the roles and views of others and actively listen to and dialoguing with teammates.
- c) Employees will freely share required information with each other, learn from each other, help one another to develop and grow, and contribute towards making the experience of working for the Company an enjoyable one for everyone in the Company.
- d) Have mutual respect and trust.
- e) Take work seriously.

Don'ts:

- a) Verbally or physically mistreat others or engage in offensive behavior and tolerate those who do.
- b) Engage in riotous or disorderly or indecent behavior at the workplace.
- c) Indulge in gambling within office premises including playing cards.
- d) Consume alcohol during working hours, within office premises, or arrive at work under the influence of alcohol.

- 4.5. **Sexual Harassment and Exploitation:** Company is committed to providing a workplace that is free from sexual harassment. Sexual harassment in the workplace is against the law and will not be tolerated. When the Department determines that an allegation of sexual harassment is credible, it will take prompt and appropriate corrective action in accordance with the Company's POSH Policy annexed as annexure 3.

Do's and Don'ts of PoSH

Do's:

- a) Stop others who are found/seen conducting any such acts that amounts to misconduct including sexual harassment at the workplace.
- b) Support a co-worker who complains about any act of misconduct including sexual harassment experienced personally or by others at the workplace.
- c) Promptly investigate all complaints of sexual harassment.
- d) Discourage employees from using profane language or displaying sexually suggestive posters, calendars, and other similar material.

Line Manager Response to Harassment

- Respond to reports quickly.
- Treat all reports seriously.
- Maintain confidentiality.
- Allow the parties to explain their versions.
- Remain neutral and impartial.
- Communicate the process for responding to reports.
- Provide support, e.g. counselling.
- Attempt to resolve the matter.
- Conduct a follow-up review.
- Train and sensitize supervisors on potential problem areas.

Don'ts

- a) Ignore complaints of employees.
- b) Assume that an employee who complains of sexual harassment provoked the behavior and deserves it.
- c) Assume that what an employee initially finds acceptable will continue to be un-offensive.

4.6. Health, Safety & Environment: As an organization and good corporate citizen, it is our commitment to adhere to the best practices of Health, Safety & Environment for the organization and its valuable members and partners too.

4.6.1. The safety and security of employees in the workplace is a primary concern of the Company. The Company shall strive to provide a safe, healthy, clean, and productive working environment for its employees.

4.6.2. It is the Company's policies that the manufacturing operations accomplish their functions in a manner that protects the health of all employees and the environment.

4.6.3. The manufacturing plants and other workplaces use dangerous equipment and engage in physically demanding work that demand strong safety standards that not only meet statutory requirements but ensure a safe and healthy workplace.

- 4.6.4.** The consideration of potential health and environmental effects should be an integral part of all Company business decisions including those relating not only to the manufacture of the components but also the design and ultimate disposal of waste generated. Steps shall be taken to minimize the risk of accidents at the workplace.
- 4.6.5.** Our commitment to sustainability drives us to minimize our environmental footprint. Employees are encouraged to contribute by conserving resources, reducing waste, and advocating environmentally friendly practices both at work and in their personal lives.
- 4.6.6.** All employees are expected to follow the dress code policy to project a professional image through attire and bearing, in turn creating a pleasant work environment and enforcing a strong sense of integrity.
- 4.6.7.** Awareness shall be created to ensure that employees, contractors, and visitors are well informed, and given appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner.

Do's and Don'ts of Health, Safety and Environment

Do's:

- a) All employees must follow all safety practices and procedures.
- b) Use the personal protective equipment provided.
- c) Employees with people Management responsibilities need to educate the team on safety and health and will be responsible for their wellbeing in the workplace.
- d) Take care that while carrying out your responsibilities none of your acts of commission and omission adversely affect other co-workers and the Environment.
- e) Familiarize yourself with emergency procedures and the safety manuals applicable to your location.
- f) Report any unsafe situations observed at work.
- g) Always wear official uniform within the factory premises.
- h) The Health and Safety guidelines become equally important for employees employed in the Night shifts.

Don'ts:

- a) Smoke within office premises other than in areas designated for the same.
- b) Sleep while on duty.
- c) Overlook potential Hazards at workplace.
- d) Use any portable music device like Walkman, Mobile or iPod during work hours or on the shop floor. Mobiles can be used only for official purposes with due permission from the Reporting Manager.

- 4.7. **Substance Abuse (Use of Drugs, Alcohol etc.):** Substance abuse poses a threat to all of us in virtually every aspect of our lives, including the workplace. For the protection of all, the Company shall maintain a drug-free work environment, including use or possession of illegal or illicit drugs, and alcohol abuse. Unless required as part of your role (for instance for security personnel were deemed necessary), possession and / or use of weapons / firearms or ammunition while on business of the Company is prohibited.

Do's and Don'ts:

Do's:

Possession of prescription medication for medical treatment is permitted if it does not affect performance or hinder other's performance.

Don't:

- a) Use, possess, manufacture, distribute, dispense, transport, promote, or sell illegal or illicit drugs or drug paraphernalia while on Company business or on Company premises.
- b) Employees are prohibited from being at work (work on machines) or on Company business while under the influence of, or impaired by, alcohol or illegal or illicit drugs.
- c) Drink at the workplace and while on duty.

5. PROTECTING COMPANY ASSETS

- 5.1. **Confidentiality of Information:** We should be aware of the following aspects.

- a) As employees, we have access to significant amounts of company information that may not be available to the public. Employees should use information received during their business dealings only for the purpose it is intended or normally used and never for personal gain or for a third party's gain.

The Company has many kinds of business relationships with many companies and individuals.

Special care is required to handle confidential information of our customers, potential customers, suppliers, potential suppliers or any other third party with responsibility.

- b) **Company information:** Any information concerning the Company's business, its customers, suppliers, etc., (including but not limited to technical, commercial and legal information) which is not in public domain and to which the employees have access or possess such information, must be considered confidential and held in confidence, unless authorized

by the Business unit Head to do so and when disclosure is required under any law. No Company information shall be disclosed without the prior approval of the Head of the Business Unit concerned. It includes **business plans, engineering and manufacturing ideas, product designs, databases, records, and any non-published financial or other data.**

This binding and obligation will continue to exist with an individual even after her/his services are no more engaged with the organization.

- c) **Employee information:** The Company shall protect the privacy and confidentiality of employee medical and personal records. All Employees who have, due to the nature of their work, accessibility to such records should not share or disclose any information unless required by any law, rule and regulation or when authorized by the employee or as per subpoena or court order and should take approval from the Head of the Business Unit concerned and Head – Personnel & Administration in all such cases.

Do's and Don'ts:

Do's:

- a) Information of a confidential, private, and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary, or careless disclosure.
- b) Upon joining, Employees are required to separately read, acknowledge, and sign the 'Confidentiality Agreement/ Service Agreement' that shall explicitly mention the terms and conditions of the confidentiality obligation and treatment of confidential information and intellectual property of the Company.
- c) Use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.
- d) Third parties have a similar interest in protecting their confidential information. In such cases, where they share confidential information as a part of work transaction, such information shall be treated with the same care as the Company's confidential information.

Don'ts:

- a) Discuss sensitive matters or confidential information in public places or even with immediate family members and friends.
- b) Transfer official information into personal databases or carry hard copies of official information (otherwise than for official purposes) outside the office, without prior permission from the Immediate Reporting Manager.
- c) Unless required by law or authorized by management, do not disclose confidential information or allow such disclosure.

This obligation of Employee with respect to confidential information continues beyond the termination of employment. The company may be forced to take legal action against any such employee or ex-employee where there is an infringement on the matters which relate to Company's confidential information or Intellectual property matters as specified in the employment contract.

- 5.2. Intellectual Property:** The Company's various types of intellectual property are highly valuable assets. They are key to the business strategy of using innovation to sell world-class components that are both unique and technologically superior. Intellectual property includes patents, copyrights, trade secrets, know how, drawings or design rights and know-how of any product or process that was developed, manufactured, or marketed by the Company.

It is the policy of the Company to secure and protect its intellectual property rights, and to take appropriate action against any individual or group making unauthorized use of our rights.

New ideas or innovations may be protected through a formal process; but regardless of whether an idea is formally protected, it shall remain the property of the Company if it was conceived or developed within the company.

- 5.3. Use of Company Assets:** All Employees of the Company are responsible for protecting and taking reasonable steps to prevent the theft or misuse of, or damage to Company's assets, including all kinds of physical assets, movable, immovable, and tangible property, corporate information and intellectual property such as inventions, designs, customer drawing and information's, copyrights, patents, trademarks and technology and intellectual property used in carrying out their responsibilities.

Do's and Don'ts:

Do's:

- a) The assets need to be employed primarily and judiciously for legitimate business purposes only.
- b) All Employees must use and maintain Company's property and resources efficiently and with due care and diligence.
- c) Any suspected loss, carelessness, misuse, or theft of the Company's assets should be immediately brought to the notice of Head of the Business Unit concerned and Head – Personnel & Administration or the respective Divisional Personnel Head. Company time is an asset. We all have an obligation to be honest with time, to perform our job to the best of our abilities, and to report to work in a manner fit to perform all assigned duties.

Don'ts:

- a) Assets are not to be used for personal use, misused, misappropriated, loaned to others, or sold or mortgaged, without appropriate authorization.
- b) Theft of Company assets is the most fundamental breach of the employment relationship and will not be tolerated. Any acts of theft may be dealt with through legal means and may result in termination.

5.4. Public Representation of the Company: Employees should refrain from interaction / communication with the print and electronic media on matters which are likely to have an impact on the image of the Company. Only specifically authorized employees shall represent the Company in all its public appearances, with respect to disclosing company and business information to public constituencies such as the media, the financial community, employees, agents, and other third-party agencies.

5.5. Representation of the Company in social media: Employees are expected to use company-provided digital resources responsibly, including email, internet access, and social media platforms, in accordance with the Company's Social Media Policy (**annexed as annexure 1**) ----. This entails respecting privacy, refraining from sharing confidential information, and adhering to cybersecurity best practices. When representing or referring to the Company on any online forum or community, employees should exhibit the behavior outlined in the social media Policy. They must engage in constructive, respectful, and productive dialogue, and promptly inform their Unit Heads of any online activity they perceive as harmful to the Company or its reputation.

5.6. Electronic Resources Usage: The electronic resources shall be used in an effective, ethical and lawful manner. The Company reserves the right to access and monitor all messages and files on its system, including information regarding employee internet use, as and when deemed necessary and appropriate. The Company will not be responsible for actions of employees deemed illegal with respect to the usage of electronic resources.

Do's and Don'ts:

Do's:

- a) Properly control access to your work areas and computers and keep sensitive information safe and secured in all forms, physical or electronic.
- b) Ensure that you use only licensed software and take back-up of all important data.
- c) Ensure appropriate destruction of information (both physical or electronic) when the same is not required for work anymore.

- d) Abide by the IT Policies and Information Security guidelines of the company.
- e) Report information security incidents such as suspicious emails, individual password sharing, data leakage or data theft, phishing or malware attacks, hacking attempts etc.

Don'ts:

- a) Usages that threaten the integrity of the system, the privacy of others, or that are otherwise illegal, are hence forbidden.
- b) Users who receive or notice obscene or inappropriate messages are needed to report the same immediately to their immediate superior or the Compliance Officer.

5.7. Cybersecurity: Employees are expected to use company-provided digital resources responsibly, including email, internet access, and social media platforms. This includes respecting privacy, refraining from sharing confidential information, and adhering to cybersecurity best practices. It is imperative to report any suspicious emails, instances of individual password sharing, data leakage, phishing or malware attacks, or hacking attempts immediately to your immediate superior or the Compliance Officer. Adherence to IT policies and information security guidelines is mandatory to ensure the integrity and security of company electronic resources.

6. COMMITTED TO CUSTOMERS & SUPPLIERS

6.1. Fair Dealings: We must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, and anyone else with whom we interact while at work. We should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice. Unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

6.2. Third Party Representation: Parties which have business dealings with the Company but are not members of the Company, such as suppliers, agents, contractors, consultants etc. are defined as third party. These parties are not authorized to represent the Company without the written permission of the Company.

Do's and Don'ts:

Do's

- a) Third parties and their employees are expected to abide by the Code in their interaction with, and on behalf of, the Company.
- b) Verify the credentials and reputation of third-party agent prior to any agreement with them and ensure that a formal contract is executed, including appropriate provisions requiring the third-party agent to comply with applicable anti-corruption and local laws.
- c) Provide a copy of this Code provide to such third-party agents, who you decide to work with.

Red Flags While Transacting with Third Parties

- Background check reveals a flawed background or reputation.
- Agent objects to anti-corruption compliance requirements.
- Agent has a personal or business relationship with a government official.
- Unusual contract terms or payment arrangements such as payment in cash or payment to a financial institution
- Requests that identity of the agent be kept confidential.
- Indication that 'facilitation payments are required' to 'get the business moving'.
- Request false invoices or any other type of false documentation; or
- Payment in a third country or in another party's name.

- 6.3. Selecting Suppliers & Procurement Practices:** The Company's policy is to purchase Material and supplies based on need, quality, service, price and terms and conditions. Suppliers should be selected based on merit, price, quality, and performance. The Company's policy is to, as a rule, select significant suppliers or enter into significant supplier agreements through a competitive bid process.

Do's and Don'ts:

Do's:

- a) All supplier agreements must be reviewed after a 2-year period and fresh bids invited to confirm the competitiveness of the existing supplier agreement.
- b) Supplies may be purchased when a combination of quality, price, and services offered, and reliability of supply warrant such purchases.
- c) Wherever the Suppliers / vendors may be relatives or friends of employees, it is required that the Employee discloses any such relationships to the Reporting Manager/Business Unit Head.

Don't:

- a) Under no circumstances any Company employee, agent or contractor should attempt to coerce suppliers in any way.
- b) Employees are not to solicit suppliers for charitable donations.

- c) Asking suppliers or customers to provide products or services based on personal relations developed is unacceptable as it can create a real or perceived conflict of interest.

6.4. Customer Orientation: It is well accepted that our customers are of paramount importance and the Company will prosper only to the extent that we meet and exceed the needs of our customers. The success of the organization depends on customer trust, satisfaction, and loyalty. The Company therefore expects all its employees to be customer-focused in approach.

Employees are strongly directed to:

- 6.4.1.** Ensure that customer needs are satisfied, and that products and services offer value to the customer.
- 6.4.2.** Ensure that products supplied to customers are as per the stated quantity and specifications.
- 6.4.3.** Endeavour to meet delivery commitments to customers and inform customers well in advance in the event of inability to meet delivery commitments for unavoidable reasons.
- 6.4.4.** Promptly respond to all queries from customers.
- 6.4.5.** Manage all customer complaints promptly and fairly.

Customer orientation and focus should not only encompass external customers but include internal customers as well. Employees are thus encouraged to ensure that both internal and external customer needs are satisfied.

7. INTERNAL GOVERNANCE OF THE CODE OF CONDUCT

7.1. Violations of the Code

- 7.1.1.** It is each employee's responsibility to ensure full compliance with all provisions of this Code & to seek guidance where necessary from their Line Manager, or from the HR or the **Compliance and Ethics Manager** as may be needed.
- 7.1.2.** Employees have a duty to observe the code and ensure that no breaches occur.
- 7.1.3.** Violations of the Company's Code of conduct may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

7.2. Reporting of instances:

- 7.2.1.** Breaches of code require immediate attention and employees have a duty to report known or suspected breaches of the code. If an Employee learns of such a breach or violation of the basic principles laid out in the "Code of

Conduct”, the Employee should report them in confidence to the Reporting manager or use the Compliance Communication Channel or connect with **Compliance and Ethics Manager**.

- 7.2.2. The Company has formulated the **Whistleblower Policy (Annexd. as Annexure 2)** with a view to provide a mechanism for its employees to raise concerns on any violations of the Code, especially with respect to legal or regulatory requirements, incorrect or misrepresentation of the company etc.
- 7.2.3. For violations in sexual harassment, employees may refer to the procedure for resolution, settlement or prosecution of acts of harassment given in the **Policy on Prevention of Sexual Harassment at Workplace (Annexd.as Annexure 3)**
- 7.2.4. Disclosures against any employee in the Strategic Job Responsibility Band or the Head of the Business Unit or the Executive Directors should be sent directly to the MD of the Company at the email-id: mitulsoni@nagatagroup.com
- 7.2.5. The first go to person in case of reporting a violation should be your Reporting Manager or the Skip-level Manager.
- 7.2.6. For all other violations of the Code, employees may report or get in touch with the **Compliance and Ethics Manager** appointed under this Code. The Unit Personnel Heads typically shall serve as the Compliance Officers for their respective divisions and shall be responsible for the implementation and enforcement of this Code.

7.3. **Role of the Compliance and Ethics Manager:**

- 7.3.1. Ensuring compliance of the Code by employees.
- 7.3.2. Overseeing training programs to educate employees on implementing the Code effectively.
- 7.3.3. Clarifying the concerns and queries raised by the employees.
- 7.3.4. Assisting in investigations and resolving the issues referred to by Employees.

7.4. **Compliance Communication Channel:** Reports of any breach or enquiries regarding the Code's interpretation or application can be addressed directly to the Compliance and Ethics Committee.

The Compliance and Ethics Committee shall consist of the following members

- a) MD - Nagata Group (India Operations).
- b) Group Ethic Counsellor - nominated from time to time
- c) Plant Ethic Counsellor - nominated from time to time

The communication to **Compliance and Ethics Committee** can be through the following Channels.

- 1.) Through Email : **codeofconduct@nagata.co.in**

- 2.) A complaint or disclosure about an alleged breach of the code should be in writing and contain following details
- a) Name, address and contact details of the Complainant (including Employee Code, if the Complainant is an employee).
 - b) Brief description of the violation, giving the names of those alleged to have violated or about to violate the Code.
 - c) Specific details such as time and place of occurrence.

7.5. Disciplinary Actions

- 7.5.1.** The matters covered in this Code are of the utmost importance to the Company and are essential to conduct its business in accordance with its stated values. We expect all employees and third-party agents to adhere to these rules in carrying out their duties for the Company
- 7.5.2.** We take violations of this Code, Company policies and applicable laws seriously. Where appropriate, the Company takes prompt corrective action, up to and including termination of employment. We strive for consistency and fairness in discipline for violations. Discipline may include a verbal or written warning; suspension with or without pay; loss or reduction of bonus or, for the most serious offenses or repeated misconduct, termination of employment.
- 7.5.3.** Any disciplinary action depends on the nature, severity, and frequency of the violation. It may also vary depending upon local law. Those who violate the laws or regulations mentioned in the Code would expose themselves and the Company to substantial civil damages and criminal penalties.

- 7.6. Prohibition against Retaliation:** Any employee who, in good faith, makes a complaint or disclosure about an alleged breach of the code, and follows the reporting procedure, will not be disadvantaged, or prejudiced in the making of such a complaint or disclosure. All reports will be treated as confidential. Reprisal, threat, retribution, or retaliation against any such person who reported a violation or a suspected violation, or against any person who is assisting in any investigation or process with respect to such a violation, is prohibited.
- 7.7. Amendments of the Code:** The Company is committed to continuously reviewing and updating its policies and procedures. Therefore, this Code is subject to modification.

- 7.8. Conclusion:** The above Code of Ethics and Business Conduct does not provide a full, comprehensive, and complete explanation of all the rules that employees are bound to follow. While covering a wide range of business practices and procedures, the Code cannot and do not cover every issue that may arise, or every situation where ethical decision must be made; but rather sets forth key guiding principles that represent the Company policy. Employees have a continuing obligation to familiarize themselves with all applicable laws, company policies, procedures, and work rules.

Annexure 1
SOCIAL MEDIA POLICY

1. Purpose

The purpose of this policy is to provide guidelines for the appropriate use of social media by Nagata Group (India Operations) employees, contractors, and affiliates.

2. Scope

This policy applies to all employees, contractors, and affiliates of the organization who use social media on behalf of the organization or in a personal capacity that may impact the organization.

3. Definitions

Social media: Includes all forms of online communication and networking platforms such as Facebook, Twitter, LinkedIn, Instagram, YouTube, blogs, and forums.

Official Account: Social media accounts created and managed by Nagata Group (India Operations).

Personal Account: Social media accounts owned and managed by individual employees.

4. General Guidelines

Be Respectful: Always communicate respectfully and professionally, avoiding offensive, discriminatory, or inflammatory language.

Confidentiality: Employees must maintain confidentiality when using social media. They must not disclose confidential or proprietary information about the organization, its clients, its projects, its initiatives, or partners.

Accuracy: Ensure that any information shared is accurate and truthful.

5. Official Accounts :

Authorization: Only authorized personnel/department will create/manage official social media accounts on behalf of Nagata Group (India Operations).

Content Approval: Approvals to be obtained from the Management for the content to be posted before posting.

Brand Consistency: Ensure that all posts are consistent with the organization's brand voice, values, and mission.

Prohibited Content: Prohibited content includes, but is not limited to, discriminatory language or imagery, harassment or bullying, confidential or proprietary information, and political or religious endorsements.

Compliance: Adhere to all relevant laws, regulations, and organizational policies when using social media.

6. Personal Accounts

Disclosure: When discussing matters related to Nagata Group, employees must disclose their affiliation with the organization.

Separation: Make it clear that views expressed on personal accounts are personal and do not represent the views of the organization.

Respect Boundaries: Do not use personal accounts to conduct official business unless authorized.

7. Employee Responsibilities

Training: Employees are required to attend training courses as and when organized on social media best practices and this policy.

Reporting: Report any inappropriate or concerning content related to Nagata Group (India Operations) to the HR department.

Monitoring: Be aware that the organization may monitor public social media activity related to the organization.

8. Monitoring and Enforcement

Monitor: Management reserves the right to monitor social media activities.

Violations: Any violation of this policy may result in disciplinary action, up to and including termination of employment.

Reporting Violations: Employees are encouraged to report violations of this policy to their supervisor or HR. Avoid responding to negative comments. Allow designated representatives to address the issue.

WHISTLE BLOWER POLICY

1. Purpose

The Whistleblower Policy aims to establish a secure and confidential framework for employees, contractors, and other stakeholders to report any illegal, unethical, or improper conduct within the organization. This policy ensures that all reports are taken seriously, investigated thoroughly, and that the whistleblower is protected from retaliation.

2. Scope

This policy applies to all employees, contractors, suppliers, & any other stakeholders of the organization. It covers all types of illegal or unethical conduct, including but not limited to breaches of the company's code of conduct, fraud, violation of laws, corruption, bribery, harassment, discrimination, safety violations, inaccurate data representation, and environmental damage.

3. Definitions

- **Whistleblower:** An individual who reports suspected illegal, unethical, or improper conduct within the organization.
- **Improper Conduct:** Includes but is not limited to fraud, theft, corruption, bribery, harassment, discrimination, safety violations, and environmental harm.
- **Retaliation:** Any adverse action taken against a whistleblower for reporting improper conduct, including but not limited to termination, demotion, harassment, and discrimination.

4. Policy Statement

Nagata India Operations is committed to maintain a culture of transparency and accountability. It encourages employees and other stakeholders to report any suspected illegal or unethical conduct without fear of retaliation. All reports will be taken seriously and investigated thoroughly, with appropriate actions taken based on the findings.

5. Reporting Procedures

1. Reporting Channels:

- **Internal Reporting:** Reports can be made directly to the **Compliance and Ethics Manager**, the HR department, or through a designated email codeofconduct@nagata.co.in
- **Anonymous Reporting:** The organization provides an anonymous reporting mechanism to protect the identity of the whistleblower.

2. Information to Include:

- Description of the suspected improper conduct.
- Date(s) and time(s) of the incident(s).
- Name(s) of the individual(s) involved.
- Any supporting evidence or documentation.
- Contact information for follow-up (optional for anonymous reports).

3. Confidentiality:

All reports will be handled confidentially to the extent possible, with information disclosed only to those who need to know for the investigation and resolution of the matter.

6. Investigation Procedures

1. Acknowledgment:

- The **Compliance and Ethics Manager** will acknowledge receipt of the report within 2 days.

2. Initial Assessment:

- An initial assessment will be conducted to determine the validity and seriousness of the report.

3. Investigation:

- A thorough investigation will be carried out by the appropriate team or external experts, if necessary.
- The investigation process will be documented, and findings will be reported to senior management or the board of directors.

4. Outcome and Action:

- Based on the investigation findings, appropriate actions will be taken, which may include disciplinary action, legal proceedings, or other corrective measures.
- The whistleblower will be informed of the outcome, if possible, while maintaining confidentiality.

7. Protection Against Retaliation

- The organization strictly prohibits any form of retaliation against whistleblowers.
- Any employee found to have retaliated against a whistleblower will face disciplinary action, up to and including termination.
- Whistleblowers who believe they have faced retaliation should report it immediately through the same reporting channels.

8. Responsibilities

- **Compliance and Ethics Manager:** Oversee the implementation of this policy, handle reports, and ensure investigations are conducted fairly and promptly.
- **Management:** Promote a culture of transparency and accountability, ensure protection against retaliation, and take appropriate actions based on investigation findings.
- **Employees and Stakeholders:** Report any suspected illegal, unethical, or improper conduct and cooperate with investigations.

9. Review and Amendments

- This policy will be reviewed periodically to ensure its effectiveness and relevance.
- Amendments to the policy may be made as required, subject to approval by senior management or the board of directors.

10. Communication

- The organization will ensure that all employees and stakeholders are aware of this policy and its provisions through regular communication.
- Whistleblower Policy communication will be included as part of the onboarding process for new employees.

PREVENTION OF SEXUAL HARASSMENT

1. Purpose

To create and maintain safe working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. Sexual harassment at the workplace or other than workplace, if involving employees, is a grave offence and is therefore, punishable as per the guidelines of "The Prevention of sexual harassment at workplace (prevention, prohibition and Redressal) Act, 2013".

2. Scope

The Policy aims to adopt zero tolerance attitude against any kind of sexual harassment or discrimination caused by any employee during their tenure in any of the company / office of Nagata Group (India Operations) towards any other person being an employee, client, guest, vendor and contractor in company premises or elsewhere in India and abroad.

3. Applicability

The Policy will be applicable to all Employees of Nagata Group (India Operations).

1. Definition

4a. Employee:

It means any person employed at the workplace of company for any work whether on the rolls of the Company or on deputation, contract, temporary, trainee, apprentice, probationer or part time working as consultant, whether working for remuneration or not either directly or through an agent/vendor including a contractor.

4b. Sexual Harassment: It means and includes any of the following:

4b.i Unwelcome sexual advances, requests or demand for sexual favours', explicitly or implicitly, in return of employment, promotion, examination or evaluation of a person towards any company a activity.

4b.ii Unwelcome sexual advances involving verbal, non-verbal or physical conduct such as sexually coloured remarks, taunts, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals' sensibilities and affect her/his performance.

4b.iii Act or conduct by a person in authority, which creates the environment at workplace hostile or intimidating to a person belonging to the other sex.

4b. iv Conduct of such an act at workplace or outside in relation to an Employee of Nagata Group (India Operations) or vice versa during the course of employment and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

- 4c. Aggrieved Women:** In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- 4d. Respondent:** Employee against whom the complaint has been filed.

1. Internal Committee (IC)

- 5a.** The management to consider and redress complaints of Sexual Harassment across the Nagata Group (India Operations) will constitute an Internal Committee. The committee will comprise of a Presiding Officer who shall be a senior women employee and three nominated members out of which at least two members shall be from amongst employees and one member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. Provided that at least one-half of the total members so nominated shall be women.
- 5b.** Name of the IC Members will be notified through notice from time to time.
- 5c.** A quorum of 03 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer and at least two members.

6. Redressal

- 6a.** Any aggrieved woman employee who feels is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the Internal Complaints Committee in writing with her signature within 03 months from the date of occurrence of incident and in case of series of incidents then within 03 months from the date of last incident.
- 6b.** The committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 6c.** The committee will hold a meeting with the complainant within 03 days of the receipt of complaint.
- 6d.** At the first meeting, the committee members shall hear the complainant and record her allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, SMS etc., to substantiate her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of events, a woman member of the committee shall meet and record her statement.
- 6e.** Thereafter, the person against whom complaint is made may be called for a deposition before the committee and an opportunity will be given to him to give an explanation, where after, an "Enquiry" shall be conducted and concluded.

- 6f.** The Internal Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings as well as its recommendations in the form of an Inquiry Report for action to the Managing Director within 10 days from the date of completion of the Inquiry.
- 6g.** Where the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, enquiry report shall be submitted to MD&CEO. Internal Committee will recommend taking action for sexual harassment as a misconduct in accordance with the provisions of the service rules of the company applicable to the respondent.
- 6h.** The disciplinary action that shall be commensurate with nature of the gravity of the offence, shall include but not limited to:
- 6h.i** Warning
 - 6h.ii** Written apology from offender
 - 6h.iii** Bond of good behaviour
 - 6h.iv** Transfer
 - 6h.v** Debarring from supervisory duty
 - 6h.vi** Denial of employee benefits like increments / promotion / salary correction etc.
 - 6h.vii** Cancellation of specific work assignment
 - 6h.viii** Suspension
 - 6h.ix** Dismissal
- 6i.** The Head HR will assist the Managing Director on the implementation of recommendations of Inquiry Report submitted by the Internal Committee.

7. Record

Annual report summarizing complaints and Redressal of sexual harassment shall be prepared by designated person. The said report as well as all documents regarding sexual harassment complaints shall be in the custody of designated person and will be termed as 'Strictly confidential'.

EMPLOYEE OATH AND DECLARATION

(To be submitted to the HR at the time of joining)

As an Employee of Nagata Group (India Operations), my purpose is to serve the Company based on defined policies and codes and to create value that no single individual can build alone. I recognize my actions/ decisions can have far-reaching consequences that affect the well-being of individuals inside and outside my enterprise, today and in the future.

Therefore, I promise:

- 1) I will act with utmost integrity and pursue my work in an ethical behaviour in all my work.
- 2) I will safeguard the interests of my shareholders, co-workers, customers, and the society in which we operate.
- 3) I will manage my enterprise in good faith, guarding against decisions and behaviour that advance my own narrow ambitions but harm the enterprise and the societies it serves.
- 4) I will understand and uphold, both in letter and in spirit, the laws and contracts governing my own conduct and that of my enterprise.
- 5) I will take responsibility for my actions, and I will represent the performance and risks of my enterprise accurately and honestly.
- 6) I will be accountable to my peers, and they will be accountable to me for living by this oath.
- 7) I will ensure that maintain the confidentiality of sensitive information and respect privacy in all business dealings.
- 8) I will be reporting any breaches of the Code of Conduct and Ethics or unethical behaviour promptly and in accordance with Company procedures.
- 9) I will follow the values of the Company in all that I do and comply with the Company Code of Conduct and Ethics.
- 10) I will engage in ongoing training and development to stay informed about updates to policies and best practices.

I also acknowledge that I have read and understood the provisions under Code of Conduct and Ethics and am aware that any act in contravention of the above provision on my part shall attract initiation of appropriate action as deemed fit.

Employee Name: _____ Date: _____

Signature: _____ Dept.: _____

NOTES

CMNO



Nagata Group (India Operations)

Core Values

H – Harmony & Teamwork

I – Integrity

T – Trust and Respect

P – Passion

A – Agility

C – Creativity & Innovation

E – Empowerment

OurAIM

Zero Accident

Zero Defect

Zero Waste

Zero Line Stoppage

Zero Break Down

Vision

Be the best-in-class for Safety, Quality, Competitiveness, Efficiency and Working Environment for all world class tooling, stamping and aggregates.

Mission

Delights our customers with highest quality services in sheet metal domain through analytical approach, teamwork and effective communication.

Pursue continuous improvement and innovation through safe working practices, employee involvement and learning culture.



Nagata Group (India Operations)

Nagata India Pvt. Ltd. (NAIL)

Sector-3, Plot no. 154-155, IMT Manesar,
Gurugram-122050, Haryana, India

**Nagata Auto Engineering India Pvt. Ltd.
(Unit-II)**

Plant-2 Survey No.752 & 753 SadatPura
Ahmedabad-382120

**Nagata Auto Engineering India Pvt. Ltd.
(Unit-I)**

Plant-1 Plot No. C-463, Ansal, Pioneer
Industrial Park, Pathredi, Bilaspur,
Gurugram-122413, Haryana, India.

**Nagata Auto Engineering India Pvt. Ltd.
(Unit-III)**

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P.O. Machrouli, Bilaspur- Kulana Road,
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