



ETHICS, INSIDER TRADING & WHISTLEBLOWER POLICY

**ALWAYS
ON THE
MOVE**



ETHICS, INSIDER TRADING & WHISTLEBLOWER POLICY

1. Purpose

SSRC Logistics Private Limited (“SSRC” or “the Company”) is committed to conducting its business with honesty, integrity, transparency, and accountability. This policy establishes standards of ethical conduct, prohibits insider trading and unethical practices, and provides a secure mechanism for reporting concerns without fear of retaliation.

2. Scope

This policy applies to:

- Directors
 - Officers and senior management
 - Employees (permanent, contractual, or temporary)
 - Consultants, vendors, agents, and business partners acting on behalf of SSRC
-

3. Code of Ethics

All covered persons shall:

- Act honestly, fairly, and in the best interests of SSRC
- Comply with all applicable laws, regulations, and company policies
- Avoid conflicts of interest and disclose any potential conflict immediately
- Not engage in bribery, corruption, fraud, coercion, or abuse of authority
- Protect SSRC’s confidential information, assets, and reputation
- Maintain respectful, non-discriminatory, and professional conduct

Violation of ethical standards may result in disciplinary action, including termination and legal proceedings.

4. Insider Trading Policy

4.1 Definition

“Insider Trading” refers to dealing in securities or financial instruments of SSRC (if applicable) or any related entity while in possession of **unpublished price-sensitive or confidential information**, or sharing such information with others for trading advantage.

4.2 Prohibitions

No director, employee, or associated person shall:

- Trade or facilitate trading using confidential or non-public information
- Share insider information with unauthorized persons
- Use company information for personal, financial, or third-party gain

4.3 Confidential Information Includes

- Financial results or projections
- Mergers, acquisitions, or expansion plans
- Asset purchases or disposals
- Pricing, contracts, tenders, or strategic decisions

Insider trading is a serious offence and may attract disciplinary, civil, and criminal liability.

5. Whistleblower Policy

5.1 Objective

This policy encourages employees and stakeholders to report genuine concerns about unethical behaviour, fraud, insider trading, misconduct, or violation of laws without fear of retaliation.

5.2 Reportable Matters

Whistleblowers may report concerns relating to:

- Fraud, theft, or financial irregularities
 - Insider trading or misuse of confidential information
 - Bribery or corruption
 - Violation of laws or company policies
 - Abuse of power or authority
 - Suppression or manipulation of records
 - Serious safety, environmental, or compliance violations
-

6. Protection Against Retaliation

SSRC strictly prohibits retaliation against any person who reports a concern in good faith. Any act of retaliation—direct or indirect—will be treated as a serious disciplinary offence. False or malicious complaints, however, may attract appropriate action.

7. Confidentiality

The identity of the whistleblower shall be kept strictly confidential, to the extent permitted by law. Information will be shared only on a need-to-know basis during the investigation.

8. Reporting Mechanism

Complaints may be reported through:

- **Email:** info@ssrc.co or Sumit.choudhary@ssrc.co
- **Written letter:** Marked “Confidential – Whistleblower Complaint”

Anonymous complaints will also be accepted, though detailed information is encouraged for effective investigation.

9. Investigation & Action

- All complaints will be reviewed objectively and promptly
 - Investigations will be conducted confidentially and impartially
 - Appropriate corrective, disciplinary, or legal action will be taken
 - The whistleblower may be informed of the status, where feasible
-

10. Policy Review

This policy may be amended or updated by the management of SSRC Logistics from time to time to ensure alignment with applicable laws and best governance practices.



Krishan Choudhary
Managing Director



www.SSRC.co

Info@ssrc.co

— — — — — *Logistics You Can Count On*

(Confidential)

Subject: Whistleblower Complaint Regarding Ethical / Insider Trading / Policy Violation

I am writing this letter under the Ethics, Insider Trading & Whistleblower Policy of SSRC Logistics Private Limited to report a concern in good faith.

Nature of Concern:

- ### Details of the Concern:

(Provide clear facts, dates, individuals involved, locations, and any supporting information)

Evidence or Documents (if any):

(Attach or describe)

I confirm that this complaint is made in good faith and that the information provided is true to the best of my knowledge. I understand that the company will protect my identity and that retaliation is prohibited under the policy.

Name (Optional): _____

Designation / Relationship with SSRC (Optional): _____

Contact Details (Optional): _____

Date: _____

Yours sincerely,
(Signature, if applicable)