

DIVINE WELLCURE PVT LTD DEHRADUN UK

CODE OF CONDUCT

The Code of Business Conduct is our guide to ethical and lawful conduct in our daily business. It requires all of us, from members of our board of directors to new hires, to adhere to a level of ethical business conduct well in excess of the legal minimum. Our compliance with both the letter and spirit of the Code of Business Conduct is essential to protecting business and reputation.

INTRODUCTION

Divine Wellcure Commitment

Divine Wellcure Pvt. Ltd. and all of its affiliates (“Divine wellcure” or the “Corporation”) is committed to maintaining the highest of business standards in our operations, wherever they may be. We recognize the importance of credibility, integrity, and trust to our success as a business.

Purpose and Applicability of the Code:

This Code of Business Conduct summarizes a number of Divine Wellcure Pvt. Ltd. policies for appropriate behaviour and applies to all employees, consultants, officers and directors of Divine Wellcure Pvt. Ltd. (hereinafter, “Employees”). Accordingly, each of us must comply with the terms of this Code. The Code will help us meet our business practice standards and comply with applicable laws and regulations. It is essential that this Code of Business Conduct be observed. The Code is very important to protecting Divine Wellcure Pvt. Ltd. business and reputation.

The Code of Business Conduct is a general guideline for making certain that:

- ☐ A work environment is maintained that promotes the dignity and self-respect of each Employee.
- ☐ All Employees are aware of and fully observe the laws and regulations that impact their business activities.
- ☐ A standard of behaviour is in place that reflects the values and integrity of Divine Wellcure Pvt. Ltd. and its Employees.
- ☐ Divine Wellcure Pvt. Ltd. is protected from financial loss and legal liability.

This Code of Business Conduct does not replace any other published rules and policies of Divine Wellcure Pvt. Ltd., including other work rules and personal conduct policies. All Divine Wellcure Pvt. Ltd. policies and standards are subject to this Code. While this Code of Business Conduct provides guidance and explains what is considered unacceptable behaviour, the Code of Business Conduct does not describe every specific act that is unacceptable. If a specific act is missing from the Code, it does not mean that act is acceptable or condoned. Ultimately, we must rely on our judgment about the right thing to do in order to maintain our personal and corporate integrity.

The Code is to be used as a guide for appropriate conduct and to prevent improper conduct. E Divine Wellcure Pvt. Ltd. will not tolerate any conduct that is unlawful or damaging to Divine Wellcure Pvt. Ltd. ' reputation.

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Employee Responsibilities:

All Employees are responsible for reading this entire Code of Business Conduct and ensuring their conduct is consistent with both the letter and the spirit of Divine Wellcure Pvt. Ltd.' business practices.

This Code will help Employees deal with specific situations. In some cases, a situation may be so complex or circumstances so unique that additional guidance is needed. If such a situation occurs and is not included in this Code, it is each Employee's duty to contact his/her supervisor or the Human Resources Department immediately. If necessary, the Human Resources Department may refer the matter to the Legal Department for further advice.

This Code and any detailed Divine Wellcure Pvt. Ltd. policy statements and procedures will be updated from time to time. All Employees are required to stay informed of any updates and to comply with all requirements.

Management Responsibilities:

Managers must exhibit the highest standards of corporate responsibility and business conduct and create a work atmosphere that supports our corporate values and policies, including this Code. It is the duty of each member of management to take into account an Employee's willingness and commitment to comply with this Code when making promotion and other employment decisions.

Compliance Requirements:

Employees must work honestly and in good faith. Employment with Divine Wellcure Pvt. Ltd. depends upon an Employee's ability and willingness to comply with this Code. Adherence to these standards carries the highest priority. All Employees are required to acknowledge compliance when they are hired and again on an annual basis.

GLOBAL BUSINESS CONDUCT GUIDELINES

Our Employees:

Discrimination, Bullying and Workplace Harassment: Employees are forbidden to discriminate against, bully or harass other Employees, in keeping with our Harassment Policy. No Employee is permitted to act in a way that is considered or could be considered illegal or harassing.

It is the responsibility of each member of management to be aware of any behaviour or conduct that could be considered workplace harassment, bullying or discrimination. Management also is required to enforce these policies and immediately contact the Human Resources Department regarding any situation that could be considered workplace harassment, bullying or discrimination.

It is the responsibility of each Employee to maintain a work environment free of discrimination, bullying and harassment and to report any situation that the Employee believes may be workplace harassment, bullying or discrimination to his/her supervisor, department head or the Human Resources Department.

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Employment of Family Members

Divine Wellcure Pvt. Ltd. allows an Employee's spouse, parents, children, and other family members to work for Divine Wellcure Pvt. Ltd., both during and after the employee's career with Divine Wellcure Pvt. Ltd., provided the employment is in Divine Wellcure Pvt. Ltd.' best interest. Family relationships, however, will not be considered in hiring decisions. All Divine Wellcure Pvt. Ltd. hiring decisions will be made strictly on the basis of individual qualifications. To avoid the possibility or appearance of preferential treatment, Divine Wellcure Pvt. Ltd. will not have one family member placed in a position of influence over another family member.

Workplace Health and Safety

The health and safety of our personnel and the safe operation of our facilities are principal objectives of Divine Wellcure Pvt. Ltd. We are committed to providing safe and healthy places of employment and will follow operating practices that eliminate or minimize exposure to hazardous or unhealthy conditions. The success of our health and safety efforts depends upon the cooperation, support, and active involvement of all Divine Wellcure Pvt. Ltd. personnel. Each Employee is responsible for working safely and complying with all safety rules and protocols at all times. We are committed to maintaining a safe and secure work environment. Threats, intimidation, harassment, assaults, and acts of violence are unacceptable and will not be tolerated.

Employees should refer to the Safety & Social Responsibility section of the Divine Wellcure Pvt. Ltd. website for our Health and Safety Policy and minimum safety standards. Questions or concerns should be reported immediately to a supervisor, the Safety & Social Responsibility Department or the Human Resources Department.

Prohibited Items

The use, sale, possession or distribution of illegal drugs, or the improper use of alcohol or prescription drugs, by Employees is strictly forbidden while on Divine Wellcure Pvt. Ltd. Premises or on job, in Divine Wellcure Pvt. Ltd. vehicles, or while conducting Divine Wellcure Pvt. Ltd. business on or off Divine Wellcure Pvt. Ltd. premises. The use of alcohol is prohibited to the extent that it has a detrimental effect on job performance, safety, or efficiency while conducting Divine Wellcure Pvt. Ltd. business on or off Divine Wellcure Pvt. Ltd. premises, or while in Divine Wellcure Pvt. Ltd. owned or leased vehicles or personal vehicles used for Divine Wellcure Pvt. Ltd. business. The approval of an Divine Wellcure Pvt. Ltd. officer is required to consume or possess alcoholic beverages on Divine Wellcure Pvt. Ltd. premises. Consumption or possession of alcohol in Divine Wellcure Pvt. Ltd. owned or leased vehicles or personal vehicles used for Divine Wellcure Pvt. Ltd. business is strictly prohibited. For further information, please refer to the Alcohol and Drug Policy.

The possession, use, or distribution of firearms, weapons, and explosives is prohibited while on Divine Wellcure Pvt. Ltd. premises, while conducting Divine Wellcure Pvt. Ltd. business, or while in Divine Wellcure Pvt. Ltd. vehicles on or off Divine Wellcure Pvt. Ltd. premises, except as authorized under the Firearm Storage, Transportation and Use Standard found on the Safety & Social Responsibility section of the Divine Wellcure Pvt. Ltd. website.

If evidence supports a reasonable suspicion of use, possession, or distribution of prohibited items, Divine Wellcure Pvt. Ltd. reserves the right to conduct searches on Divine Wellcure Pvt. Ltd. premises or in Divine Wellcure Pvt. Ltd. owned or leased vehicles for such items.

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OUR COMPANY:

Document Retention:

Employees must comply with Divine Wellcure Pvt. Ltd.' department-specific document (physical and electronic) retention guidelines to ensure that all applicable laws and regulations are met. Each Employee should become familiar with and adhere to these guidelines. Additionally, when litigation or an investigation is pending, Employees are prohibited from modifying or destroying relevant documents or records, including Employees' personal files and electronic records. The consequences of modifying or destroying any relevant documents or records are severe and may include prosecution. An Employee who has any doubt about the legality or propriety of modifying or destroying any document or record should contact his/her supervisor or General Counsel before proceeding.

Employees should refer to the Records & Document Management Policy and the Records & Document Management section of the Divine Wellcure Pvt. Ltd. website for further department-specific guidelines.

External Communications

From time to time, Employees may be contacted by government representatives or legal counsel representing other companies, government agencies, or individuals in connection with Investigations that concern Divine Wellcure Pvt. Ltd., its business, clients, Employees, or suppliers. While Divine Wellcure Pvt. Ltd. cooperates with all reasonable requests from government agencies and authorities related to Divine Wellcure Pvt. Ltd.' business, an Employee receiving a request for information other than what is provided on a routine basis should decline to respond and immediately report the request to his/her supervisor and seek guidance from the Legal Department. Likewise, if an Employee receives a subpoena or other request to testify or produce documents in relation to Divine Wellcure Pvt. Ltd.' business, a copy of the subpoena or request should be forwarded immediately to our General Counsel. All information provided should be truthful and accurate. Employees must never mislead any investigator and must never modify or destroy documents or records in response to an investigation.

Disclosure of Corporate Information (Insider Trading and Selective Disclosure):

Employees must not trade Divine Wellcure Pvt. Ltd. securities while in possession of material, non-public corporate information. Employees must not use such material, non-public corporate information for their benefit or the benefit of others. Material corporate information is any information that, if known, might influence a reasonable investor's investment decision to buy, sell, or hold securities of Divine Wellcure Pvt. Ltd.. Non-public means any corporate information that has not been released by Divine Wellcure Pvt. Ltd. for public dissemination and which is intended to remain confidential until such authorized dissemination. With the exception of disclosure to Divine Wellcure Pvt. Ltd. ' advisors, Employees should not share material, non-public corporate information with anyone outside Divine Wellcure Pvt. Ltd. (including family members) until it has been made public, regardless of how the information may or may not be used. These restrictions also apply to trading in securities of any other company (including, but not limited to, competitors, suppliers, and customers) if an Employee learns of any material, non-public information about that company during the course of his/her employment with Divine Wellcure Pvt. Ltd.

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Employees must adhere to blackout restrictions posted on published blackout calendars. Trading blackouts are implemented to ensure that “insiders” do not have the advantage of information that has not been announced to the general investing public. “Insiders” are considered to be anyone who has access to information that has not been released to the public realm. Applicable securities laws dictate the protection of the entire investing public to ensure fairness. Should an individual breach insider trading rules they may be subject to significant penalties by regulatory authorities.

Announcements of material information will include scheduled and unscheduled announcements. Scheduled announcements include the release of quarterly financial statements, annual financial statements and annual reports of Divine Wellcure Pvt. Ltd., and in that regard, trading in Divine Wellcure Pvt. Ltd. securities by Employees will be prohibited for a certain time before and after the release of financial statements. Unscheduled announcements may include the release of information relative to changes in the Corporation of a financial or structural nature, which may or may not require trading blackouts.

Management will make every attempt to inform Employees of changes to blackout periods. However, blackout periods may change without notice. Should you have any questions or require clarification regarding trading restrictions, it is your responsibility to direct these questions to General Counsel prior to trading any Divine Wellcure Pvt. Ltd. securities.

Employees must report violations or misuse of material, non-public corporate information to our General Counsel immediately.

Directors and officers of Divine Wellcure Pvt. Ltd. are required by securities regulations to make certain filings with securities commissions to report their holdings and transactions in Divine Wellcure Pvt. Ltd.’ securities. Questions about these laws should be directed to the General Counsel.

Conflicts of Interest:

Employees are not permitted to do anything that does not support the best interests of Divine Wellcure Pvt. Ltd. . For example:

- ☐ An Employee should not use Divine Wellcure Pvt. Ltd. property for his/her own material benefit.
- ☐ An Employee should not influence Divine Wellcure Pvt. Ltd.’ contractors or consultants for his/her own personal gain.
- ☐ An Employee, or his/her family members or friends, should not act on business opportunities or investments presented to Divine Wellcure Pvt. Ltd. , other than for the benefit of the Corporation, that are not available to the public, without written permission from General Counsel.
- ☐ An Employee should not make or recommend decisions for Divine Wellcure Pvt. Ltd. that might benefit the Employee, his/her family members, or friends financially.
- ☐ An Employee or their spouse should not own a five percent (5%) or more equity interest in any entity that sells supplies, furnishes services, or otherwise does business with Divine Wellcure Pvt. Ltd. without written permission from General Counsel.
- ☐ An Employee or their spouse should not own a five percent (5%) or more equity interest in any entity that is a competitor of Divine Wellcure Pvt. Ltd. without disclosing such interest.

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Before acknowledging compliance with this Code, an Employee must report in writing any conflict of interest to the Human Resources Department. If conflicts of interest arise after the Employee has acknowledged compliance, the Employee must report the conflicts immediately in writing to the Human Resources Department, which will disclose such conflicts to General Counsel.

During business hours, Employees should devote their full time and attention to Divine Wellcure Pvt. Ltd. and their assigned job duties. Unrelated outside activities, business, or secondary employment are not permitted during business hours.

With the exception of Divine Wellcure Pvt. Ltd. directors, no Employee of Divine Wellcure Pvt. Ltd. should serve on the executive or board of any corporation that Divine Wellcure Pvt. Ltd. does not control or have an ownership interest in without the written approval of Divine Wellcure Pvt. Ltd.' President and CEO. It is acceptable to serve on the board of a non-profit, charitable, religious, or civic organization without prior written approval, provided it does not interfere with or impair the Employee's ability to perform their duties at Divine Wellcure Pvt. Ltd. and represents a commitment of personal time.

To avoid potential conflicts of interest, it is against Divine Wellcure Pvt. Ltd.' policy for Divine Wellcure Pvt. Ltd. to extend loans to officers or directors. It is acceptable, however, for Divine Wellcure Pvt. Ltd. to extend loans to Employees in certain instances (e.g. loans to purchase personal computers).

Confidential and Proprietary Information:

Occasionally, Employees may know confidential information concerning Divine Wellcure Pvt. Ltd.' business, including customers, suppliers, business contacts, Employees, or technical operations. Employees must keep this information confidential during and after their employment with Divine Wellcure Pvt. Ltd.. Personal information relating to Divine Wellcure Pvt. Ltd. customers, suppliers, business contacts or Employees must be treated in accordance with Divine Wellcure Pvt. Ltd. ' Privacy Policy.

Generally, any information stored by and/or processed by Divine Wellcure Pvt. Ltd. is proprietary information. This confidential information includes computerized data, methods, techniques, and documentation relating to Divine Wellcure Pvt. Ltd.' computing services, developed software, and third-party software.

Employees must be aware of their responsibilities regarding access to Divine Wellcure Pvt. Ltd.' computer services, and the access, use, and disclosure of confidential information. Confidential and proprietary information must be used for Divine Wellcure Pvt. Ltd. purposes only, never for personal gain. Divine Wellcure Pvt. Ltd. prohibits Employees from releasing or misusing any confidential and proprietary Divine Wellcure Pvt. Ltd. information.

Accounting and Reporting:

Accurate documents are important during audits and other internal or external reviews. All Employees must comply with Divine Wellcure Pvt. Ltd.' accounting and reporting procedures and make sure all books, records, accounts, and supporting papers are accurate and complete. Employees are forbidden to forge, falsify, or intentionally leave out important facts on any business documents of Divine Wellcure Pvt. Ltd. which could mislead auditors or other internal

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or external reviewers.

Expense Accounts:

Employee expense accounts are to be used only to reimburse Employees for items and activities that are purchased for Divine Wellcure Pvt. Ltd. business. Employees must submit accurate expense reports of the money spent for this purpose.

Divine Wellcure Pvt. Ltd.' Information Technology Resources:

Corporate information, information systems and electronic communications are considered assets and valuable resources to Divine Wellcure Pvt. Ltd.. Divine Wellcure Pvt. Ltd. requires the appropriate use of these assets and their protection in a manner commensurate with their sensitivity, value and criticality. Any electronic communication of personal information must be in accordance with Divine Wellcure Pvt. Ltd.' Privacy Policy.

All Employees are required to:

- ☐ Manage and protect corporate information, information systems and electronic communications in accordance with all Divine Wellcure Pvt. Ltd. policies, standards and procedures, including statutory and regulatory requirements;
- ☐ Take accountability for appropriate security, access and retention of specific information they are responsible for; and
- ☐ Report incidents and assist in investigations relating to the misuse of information assets.

Divine Wellcure Pvt. Ltd.' information technology resources, such as email and internet access, are provided to Employees in pursuit of Divine Wellcure Pvt. Ltd.' business. While limited personal use of these resources is acceptable, Employees should not expect their use of these resources to be private or confidential. Personal use of these resources, such as accessing social networking/media websites (e.g. Facebook, Twitter, YouTube, etc.), also should not interfere with Employee productivity or business processes.

Employees should take the same care in their electronic communications as they take when they communicate in person or by paper. Information and data are at risk when transmitted over the internet.

Employees shall not use Divine Wellcure Pvt. Ltd.' information technology resources inappropriately, including the following prohibited activities:

- ☐ Accessing, viewing, downloading, storing or redistributing any material or message that is illegal or offensive;
- ☐ Activities designed to evade, compromise or otherwise exploit security controls;
- ☐ Possession or use of assessment and discovery tools that could be used to collect information to compromise the security of Divine Wellcure Pvt. Ltd. ' information system or launch attacks against other parties' information systems;
- ☐ The intentional creation and/or transmission of malicious code (viruses, worms, etc.);
- ☐ Malicious activity including, but not limited to: erasing, renaming or making unusable any software, data or information;
- ☐ Disclosing, gathering or using another Employee's account/password to access any information technology resources;
- ☐ Participation in chain letters or other forms of mass mailing or marketing; or
- ☐ Connecting non-Divine Wellcure Pvt. Ltd. /personal devices (laptops, external

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hard/flash drives, etc.) directly to an Divine Wellcure Pvt. Ltd. device or network unless authorized by the Information Services Department.

Divine Wellcure Pvt. Ltd. does not allow Employees to copy or distribute copyrighted materials (e.g., software, database files, articles, graphics, music, movies, products, services etc.) through Divine Wellcure Pvt. Ltd. ' email system or by any other means without confirming in advance from appropriate sources that Divine Wellcure Pvt. Ltd. has the right to copy or distribute the material. Employees are not permitted to install any software on Divine Wellcure Pvt. Ltd. ' information systems without the express written consent of an executive with responsibility for the Information Services Department.

An Employee's logon IDs and passwords are intended for his/her use only and each Employee is responsible for all activity that occurs under their accounts. Employees must protect their accounts through the use of strong passwords.

Divine Wellcure Pvt. Ltd. may access its information technology resources at any time as part of an internal audit or to investigate suspected unauthorized use, and may disclose the information it accesses to law enforcement or other third parties without prior consent of the sender or the recipient.

Employees should consult the Information Services Security Policy and the Information Services Security section of the Divine Wellcure Pvt. Ltd. website for further policies, responsibilities, guidance and awareness related to information security.

Internet/Intranet Site Development:

Divine Wellcure Pvt. Ltd. ' internet and intranet are important platforms to communicate Divine Wellcure Pvt. Ltd. information to Employees, customers, and the public.

As such, the Corporation's Information Services Department and the Corporate & Investor Relations Department shall be solely responsible for and shall administer the creation and development of all company internet and intranet sites and content. However, any Employee or stakeholder suggestions for enhancement to the sites are encouraged.

Company Logo:

The logos of Divine Wellcure Pvt. Ltd. and its business units are considered property of Divine Wellcure Pvt. Ltd. and must only be used for business purposes. Only the approved logos, which are available through the Corporate & Investor Relations Department, may be used, and approval must be obtained from an executive with responsibility for this department prior to using any Divine Wellcure Pvt. Ltd. logo. Re-creation or alteration of Divine Wellcure Pvt. Ltd. ' logos is not permitted. Furthermore, all logo items, such as apparel and office items, must be purchased through Corporate & Investor Relations.

OUR BUSINESS PARTNERS AND CUSTOMERS

Relationships with Contractors and Suppliers

Contractor and supplier relationships must be managed in a fair, equitable, and ethical manner consistent with this Code of Business Conduct, all applicable laws, and good business practices.

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Divine Wellcure Pvt. Ltd. promotes competitive procurement to the maximum extent practical and evaluates every supplier's products and services on the basis of technical excellence, quality, reliability, service, price, delivery, and other relevant objective factors. Divine Wellcure Pvt. Ltd. prohibits Employees from making purchasing decisions on the basis of personal relationships, friendships, or the opportunity for personal financial gain.

Employees must respect the terms of supplier and contractor contracts and licensing agreements and safeguard all confidential information received from a contractor or supplier, including pricing, technology, or proprietary design information. This confidential information must not be disclosed to anyone outside Divine Wellcure Pvt. Ltd. without the written permission of the supplier or contractor.

All contractors who exchange or receive personal information from Divine Wellcure Pvt. Ltd. must have privacy policies and practices in compliance with applicable Canadian and United States federal, provincial and state laws.

Anti-Corruption:

Divine Wellcure Pvt. Ltd. is committed to honesty and integrity in all of its business operations and will actively avoid corruption. We recognize that we may operate in jurisdictions which have different standards of ethical behaviour. Regardless of location, Employees shall carry out their duties in accordance with the principles set out in this Code and, specifically, will comply with all applicable anti-bribery and fair practices legislation.

Acts of corruption, either direct or indirect, are prohibited. Accordingly, Employees shall not engage in any acts that are improper or could appear to be improper, including the following:

- ☐ Paying bribes or kickbacks to, or accepting bribes or kickbacks from, public officials or private individuals;
- ☐ Making facilitation payments;
- ☐ Failing to keep complete and accurate records of transactions;
- ☐ Approving payment of invoices or expenses without proper back-up or scrutiny;
- ☐ Engaging in joint ventures or retaining agents or consultants to deal with public officials without conducting adequate due diligence of the counterparty's previous activities or reputation.

Compliance with these principles will ensure that Divine Wellcure Pvt. Ltd.'s business activities are transparent and our commercial relationships are based upon honesty and fairness.

Gifts and Entertainment:

Reasonable gifts and entertainment are a part of normal business courtesy and are not prohibited. In many cultures, exchanging gifts or entertainment is designed to foster trust in a business relationship. However, Employees should always use good judgment and discretion to avoid the appearance of impropriety or obligation. Divine Wellcure Pvt. Ltd. Employees should be certain that any gifts given or received, or entertainment hosted or attended as a guest, do not violate the law, customary business practices, or this Code of Business Conduct.

While Employees may exchange or accept gifts with their customers and suppliers as part of

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normal business courtesy, no gift, favor, or payment should be accepted which imparts a future obligation on the Employee or was given in an attempt to influence decisions regarding the business of Divine Wellcure Pvt. Ltd. . Additionally, the value of the gifts exchanged should be reasonable, and the exchanges should occur infrequently.

Likewise, while Employees may be participants in entertainment with their customers and suppliers as hosts or guests in the normal course of a business relationship, Employees must not be participants when the entertainment is an attempt to influence decisions regarding the business of Divine Wellcure Pvt. Ltd. or imparts a future obligation on the Employee. Additionally, the value of the entertainment should be reasonable and the Employee's participation should occur infrequently. Finally, Employees are prohibited from participating in inappropriate entertainment as either a guest or a host.

Gifts and entertainment in excess of \$200 may be accepted, if approved in advance by an executive officer. If a gift has been received but, given the circumstances, the gift is determined to be inappropriate, your manager may require the gift be returned to the originator. An Employee who has any doubt about the propriety of a gift or entertainment should contact his/her supervisor or the Human Resources Department before accepting the gift or participating in the proposed activity.

Obtaining and Using Competitor Information

While information about our competitors, customers, and suppliers is a valuable asset, the law and our standards of appropriate business conduct require that our Employees obtain this information legally. It is not unusual to obtain information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, Employees are prohibited from obtaining proprietary or confidential information about our competitors, customers, or suppliers through illegal means, or from using any proprietary or confidential information acquired during a prior employment relationship. It is also not acceptable to use or seek to acquire proprietary or confidential information when doing so would require anyone to violate a contractual arrangement, such as a confidentiality agreement with a prior employer. Employees are prohibited from taking any improper actions to gain information about our competitors, customers, and suppliers.

OUR COMMUNITIES

Environmental Compliance:

Divine Wellcure Pvt. Ltd. is dedicated to complying with all relevant environmental laws and regulations and requires Employees to comply with these laws and regulations as well. It is the duty of each Employee to report what he/she believes to be environmental violations to his/her supervisor or the Safety & Social Responsibility Department. For further information, please refer to the Environment Policy.

Political Contributions:

Only Divine Wellcure Pvt. Ltd.' President and CEO may authorize use of the Corporation's resources to support political activities. Employees must not use Divine Wellcure Pvt. Ltd.' money, credit, property, or services for political activities. Outside of Divine Wellcure Pvt. Ltd. business hours, Employees may participate in any political activities of their choice, but Divine

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Wellcure Pvt. Ltd. will not support or reimburse Employees financially.

Requests for Information from the Media and Public:

Only Divine Wellcure Pvt. Ltd.' President and CEO and the Corporate & Investor Relations Department are authorized to work with the media directly. When Divine Wellcure Pvt. Ltd. provides information to the news media, Divine Wellcure Pvt. Ltd. has the obligation to report accurately and completely all related material facts. In order to ensure that Divine Wellcure Pvt. Ltd. complies with its obligations, Employees who are contacted by the media for information regarding Divine Wellcure Pvt. Ltd.' business activities and plans, financial information, or Divine Wellcure Pvt. Ltd.' position on public issues, must refer the request to the Corporate & Investor Relations Department. Likewise, all requests from the media for interviews must be directed to Corporate & Investor Relations. Employees may not answer any questions from any member of the media unless they have participated in Divine Wellcure Pvt. Ltd.' media training program and consulted with the Corporate & Investor Relations Department.

Press Releases:

Press releases allow Divine Wellcure Pvt. Ltd. to announce important and relevant information to the public through the media. If a business unit or department within Divine Wellcure Pvt. Ltd. anticipates the necessity for a press release to be created, the business unit or department must contact the Corporate & Investor Relations Department to discuss the appropriateness of such a release and to provide the needed information. All press releases must be written and issued by the Corporate & Investor Relations Department and are subject to application of the Disclosure Policy protocols.

Public Speaking and Publishing Articles

Speeches and articles offer excellent opportunities for Divine Wellcure Pvt. Ltd. and its Employees to present topics, ideas, and information of interest to business and professional audiences. These communications provide the public with a clearer understanding of Divine Wellcure Pvt. Ltd. and its various business units. A speech or article on a professional topic written by an Employee for delivery to an audience or publication represents Divine Wellcure Pvt. Ltd. Speeches and articles must be approved by the Corporate & Investor Relations Department prior to the speaking engagement or submission for publication.

Social Networking and Blogs

Employees have the right to create personal blogs and postings on social networking websites. However, online misconduct can be grounds for discipline, even if it does not occur during business hours or using Divine Wellcure Pvt. Ltd.' resources. Inappropriate content for online employee postings includes, but is not limited to, the following:

- ☐ Divine Wellcure Pvt. Ltd.' confidential or proprietary information;
- ☐ Information concerning Divine Wellcure Pvt. Ltd. or Employees that would violate this Code or any other Divine Wellcure Pvt. Ltd. policies, including the Privacy Policy; and
- ☐ Negative comments about Divine Wellcure Pvt. Ltd. or Employees, or that would harm the reputation of Divine Wellcure Pvt. Ltd. or its Employees.

Community Involvement

Divine Wellcure Pvt. Ltd. directly and through its Employees contributes to the general well-

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being and improvement of towns, cities, and regions where it has operations. Divine Wellcure Pvt. Ltd. provides support to worthwhile community programs in areas such as social welfare, health, education, and arts and culture to promote the development of positive relationships in the areas where we have business interests. Divine Wellcure Pvt. Ltd. also encourages the recruitment of qualified local personnel where practical. All Divine Wellcure Pvt. Ltd. community involvement activities and requests for corporate contributions must be approved by the Corporate & Investor Relations Department in coordination with the Safety & Social Responsibility Department.

While Divine Wellcure Pvt. Ltd. encourages Employees to participate in charitable organizations and other community activities of their choice, these outside activities should not interfere with job duties. Accordingly, prior approval from your manager must be obtained when participation is supported by Divine Wellcure Pvt. Ltd. and when utilizing Divine Wellcure Pvt. Ltd. resources (including work time, e.g. days of caring). Where participation is on personal time and does not conflict with job duties then approval is not required. No Employee may pressure another Employee to express a view that is contrary to a personal belief or to contribute to or support political, religious, or charitable causes.

Community Projects:

When a new project or business issue affects a local community, the business unit should seek the guidance of the Corporate & Investor Relations Department to help facilitate communications with the affected community. The Corporate & Investor Relations Department will serve as support, proactively building and maintaining relationships with local communities as project development occurs. This will include developing a consistent platform to help educate landowners and communities on Divine Wellcure Pvt. Ltd. ' operations and safety programs.

REPORTING VIOLATIONS AND RESOURCES FOR GUIDANCE

This Code and other Divine Wellcure Pvt. Ltd. policies provide general information for seeking guidance or reporting violations of the Code to supervisors, department heads, the Human Resources

Department or our General Counsel. For more serious breaches of this Code, or if you have not received a satisfactory response, please refer to the Whistleblower Policy discussed below.

Whistle blower Policy

Divine Wellcure Pvt. Ltd. has instituted a Whistleblower Policy to provide for the reporting and review of concerns relating to accounting and auditing matters, as well as other corporate misconduct and breaches of this Code of Business Conduct. Like the Code of Business Conduct, the Whistleblower Policy is designed to encourage ethical behaviour by all Divine Wellcure Pvt. Ltd. Employees. Further details, and procedures for submitting a report, are set out in the Whistleblower Policy.

Disciplinary Action:

This Code is intended to help Employees conduct themselves in a manner consistent with our values. Employees may face disciplinary action if they:

- ☐ Violate this Code
- ☐ Encourage or help other Employees to violate this Code

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- ☐ Condone other Employees who violate this Code
- ☐ Fail to report a Code violation
- ☐ Conceal a Code violation
- ☐ Retaliate against any Employee who reports a Code violation in good faith
- ☐ Fail as an officer, director, manager, or supervisor to take appropriate steps to ensure compliance with this Code

Disciplinary action may include one or more of the following:

- ☐ A warning
- ☐ A written reprimand
- ☐ Mandatory reimbursement of losses or damages
- ☐ Suspension
- ☐ Demotion
- ☐ Termination of employment with Divine Wellcure Pvt. Ltd.
- ☐ Referral for criminal prosecution or civil action.

Management has the discretion to determine the level and type of discipline that is appropriate in any given circumstance. For more information please refer to the Positive Discipline Procedure.

Monitoring

Divine Wellcure Pvt. Ltd. will monitor compliance with its policies and procedures, including this Code.

Questions/Effect of this Code of Business Conduct

This Code is not a comprehensive listing of every Divine Wellcure Pvt. Ltd. policy or applicable law. If questions arise about what this Code means or how it should be applied, Employees should contact their supervisor, department head or the Human Resources Department.