

# **KRANTI INDUSTRIES LIMITED**

## **CODE OF CONDUCT FOR EMPLOYEES**

**VERSIONS OF POLICY**

Rev. No.	Description of Change	Approved by	Rev. Date	Effective Date
1	Original Policy	Managing Director	-	21 December, 2021

**TABLE OF CONTENT**

Sr. No	Particulars	Page No
1.	Preamble	4
2.	Meaning	4
3.	Applicability of the Code	4
4.	Object, Function & Features of the code	4
5.	Our Values	5
6.	Ensuring Product Quality	6
7.	Responsible Marketing	6
8.	Commitment To Our Customers	6
9.	Commitment To Our Suppliers And Business Associates	6
10.	Commitment To The Environment	6
11.	Compliance With The Law	7
12.	Insider Trading And Corporate Confidentiality	7
13.	Assist In Audit And Investigation	8
14.	Fraud And Misconduct	8
15.	External Communication	8
16.	Investor Relations	8
17.	Equal Employment Opportunity And Respecting Diversity And Human Rights	9
18.	Conduct At The Workplace	9
19.	Freedom From Harassment	9

20.	Ensuring Health And Safety	10
21.	Drugs And Alcohol	10
22.	Adhering To Anti-Violence Guidelines	10
23.	Protection And Responsible Use Of Corporate Assets And Information Technology	11
24.	Protect Confidential Information Of The Company, Its Employees, And Its Business Associates	11
25.	Intellectual Property And Trademarks	11
26.	Issuance Of And Amendments To Our Code	12
27.	Investigation Of Reported Code Violations	11
28.	Obligations Of Line Managers And Others Receiving Reports Of Potential Code Violations	12
29.	Reporting Violations	13
30.	Disciplinary Action	13
31.	Signature And Acknowledgement	13
32.	Waiver	14
33.	Non-Retaliation	14
34.	Glossary	15

# Code of Conduct for Employees

## Preamble:

Trust is fundamental to everything we do. Working by the Kranti's philosophy means we must always act with integrity to ensure that we are trusted by our customers, colleagues, business partners, and the communities in which we operate. Our Code of Conduct sets out what we expect from every single person working for and with the Kranti Industries Limited ('Company' or 'Kranti'). It also underlines our responsibilities to our people, partners, and shareholders. The Code of Conduct ('Code') helps us make informed decisions and tells us where to go for more information.

The code of conduct are our core values, vision and mission of the Company defines the culture of KRANTI.

## Meaning:

"Code of Conduct" The Code of Conduct is our central policy document, outlining the requirements that every single person working for and with the Company must comply with, regardless of location. We may also have additional policies that we need to adhere to which are specific to role or location.

## Applicability of the Code:

The Code is for everybody working for or on behalf of the Company. We expect everyone who represents the Company to uphold the same standards and to abide by our Code and policies. In addition, individual business units issue policies that provide more specific guidance about certain business practices. If we need help finding or understanding a policy, or in case we need any clarification or guidance on the Code, we should speak to the *Compliance Officer*.

## Object, Function & Features of the code:

The Company expects us to:

- Behave in an ethical manner, taking pride in our actions and decisions.
- Comply with the principles and rules in our Code, and fulfill our legal and regulatory obligations.
- Seek guidance wherever required if we feel a working practice is not ethical or safe.
- Report non-compliance or breach of our Code immediately.
- Behave in a manner that upholds dignity of every individual associated.

The Company philosophy sets out our Core Values in terms of how we work, so we are admired by our customers, shareholders, the people we work with, and the communities we work within.

Professionalism	Good corporate citizenship	Quality focus	Customer first	Dignity of the individual
We have always sought the best people for the job and given them the freedom and the opportunity to grow. We will continue to do so. We will support innovation and well-calculated risk taking, aligned with company and individual performances.	As in the past, we will continue to seek long-term success, which is in alignment with the needs of the countries we serve. We will do this without compromising on our ethical business standards.	Quality is the key to delivering value for money to our customers. We will make quality a driving force in our work, in our products, and in our interactions with others. We will do it 'First Time Right' and Every time.	We exist and prosper only because of the customer. We will respond to the changing needs and expectations of our customers speedily, courteously, and effectively.	We will value individual dignity, uphold the right to express, respect the time, disagreements, and effort of others. Through our actions, we will nurture fairness, trust, and transparency.

## OUR VALUES

We do not permit acceptance or offering of gifts from past, current, or prospective customers, suppliers, distributors, dealers, consultants or fellow employees of the company (except on the occasion of a marriage – from fellow employees; or upon retirement). We may accept an invitation to a meal, entertainment or a sports event which is within the scope of social formality and not excessively extravagant, expensive or frequent. Such invitations should ideally be pre-cleared by the Line Manager (who should ensure that such an invitation meets the above criteria, and is unlikely to create a Conflict of Interest). Acceptance of such invitations by an employee (or his or her relatives) or attendance at any such event, should be reported to the **Compliance Officer**.

Our Values are based on the following pillars.

- **INTEGRITY:** we believe be honest and honor all interactions.
- **TEAMWORK:** we believe teamwork assist us Embrace unity & collaboration while working.
- **QUALITY:** Build robust process & system to exceed customer expectations.

- **INNOVATION:** Creating thinking with the latest technology
- **BUILDING RELATIONS:** Human & professional respect while dealing with all the Stakeholders.

## **ENSURING PRODUCT QUALITY**

Quality is our most valued asset and it remains at the core of our business policy. We seek to satisfy our customers' high quality and safety standards, despite the ever-increasing complexity of products and systems. A detailed policy on 'Quality' is listed in the Appendix.

## **RESPONSIBLE MARKETING**

We compete vigorously and effectively with fairness and honesty of purpose. Honesty is our guiding principle in all our sales, marketing, and advertising pursuits. We ensure that only complete, factual, and truthful statements about the Company and its products and services are made in all our marketing campaigns.

## **COMMITMENT TO OUR CUSTOMERS**

We must treat our customers ethically, fairly, and in compliance with all applicable laws, and earn our business on the basis of superior products deliverables and service. We do not enter into any kind of unfair or deceptive trade practices to win any deal or customer. Customer complaints and concerns should be attended to the fullest satisfaction of the customer.

## **COMMITMENT TO OUR SUPPLIERS AND BUSINESS ASSOCIATES**

- We treat our suppliers and subcontractors with fairness and integrity. We respect the terms and conditions of our agreements with suppliers and honour our commitments.
- Just as the Company competes fairly, we should make sure that all our decisions are based solely on the ability to add value to the Company's products or services, or help fulfil the strategic growth plans of the Company.
- Only such persons shall be selected to be our business partners who do their business in fair and transparent manner and should not involve in any mal-practices. We shall ensure that our business partners' are aligned to our Code of conduct, Core Values.
- We select goods and services that best contribute to the long-term well-being of the Company.
- We choose our suppliers based on competitive price, quality, delivery, service, reputation, environmental, and business practices. We also expect our suppliers to support our core labour standards and abide by all applicable local and international laws.

## **COMMITMENT TO THE ENVIRONMENT**

We are committed to work for the upliftment and betterment of the communities we operate in. We consider the impact on biodiversity in our business activities. We tirelessly work towards elimination of waste generation in our process. Our CSR programs use responsible business practices and social investments to create long term value.

Our policy is that operations, products and services, while meeting regulatory requirements should also accomplish their functions in a manner that protects health and the environment.

## COMPLIANCE WITH THE LAW

- We are expected to conduct business as responsible corporate citizens, and follow the applicable legal framework of the country in which we operate in spirit and by letter of the law. All of us are expected to know and understand the legal obligations that apply while executing our duties and responsibilities on the job.
- Ignorance cannot be an excuse for violation of law. Where any provision of the Code conflicts or is inconsistent with applicable law, the provisions of that law must be complied with and would override this Code. We should always ensure that we are conducting business with reputable customers, for legitimate business purposes, with legitimate funds in compliance with anti-money laundering principles.

The Company transfers goods, services and technologies across national borders, and hence our business transactions are subject to various trade controls and laws that regulate export and import. We should always comply with these laws. Where there is a conflict between the local and international law, we should always apply the local law. Violations of applicable government laws, rules, and regulations may subject us to individual criminal or civil liability. Such individual violations may also subject the Company to civil or criminal liability, or the loss of reputation or business, and both these events may attract disciplinary action by the Company.

- We must ensure that the Company's accounting and financial records meet the highest standards of accuracy and completeness. We should record and report all financial and non-financial transactions and information honestly, accurately, and objectively for stakeholders' perusal.
- The records must be managed securely throughout their life cycle as per the 'Preservation of Documents Policy' and in compliance with legal, tax, regulatory, accounting, and business retention requirements.
- If we have a reason to believe that any of the Company's books, records, or disclosures are inaccurate, irregular, or misleading, we should immediately report to the Chief Financial Officer and/or the Compliance Officer, citing the nature of such an issue.
- Those authorised to make disclosures of the Company's information must ensure that information provided to the public is true, accurate, and complete. No disclosure should be misleading.

## INSIDER TRADING AND CORPORATE CONFIDENTIALITY

- There are provisions governing Insider Trading which include Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct for Prevention of Insider Trading in Securities of Kranti Industries Limited. It is mandatory upon every employee to comply with the same. Any non-compliance thereof should be reported to the Compliance Officer under the Insider trading Regulations.

## ASSIST IN AUDIT AND INVESTIGATION

- During our employment with the Company, we may be asked to participate in an audit or internal investigation conducted by the Company's external auditors or other audit agencies. We should cooperate fully and communicate honestly when participating in such efforts.
- We may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If we receive such a request, we should immediately contact the Line Manager and/or the Company's Legal department for information and guidance.

## FRAUD AND MISCONDUCT

- Any fraudulent (refer glossary 10 for definition) behavior, misrepresentation or misconduct is liable to be investigated and the employee(s) concerned is liable to face appropriate disciplinary and/or legal action.
- Acts of commission or omission which are detrimental to the business of the Company i.e. bribery, fraud, pilferage, theft, unrecorded sales or purchase, partial recording of income, etc. are termed as misconduct.
- We are all responsible for reporting fraud, falsification, and manipulation of data and information.

## EXTERNAL COMMUNICATION

- If we are contacted and requested to discuss Company business with any member of the press, investors, market analysts, or any other outside parties, we should refrain from doing so and instead, refer the request to the designated spokesperson. For further guidance on such external communications, contact the Compliance Officer
- Our communication about our competitors and their products should be correct and accurate and should in no way be influenced by rumors.
- Similarly, when using social media, we should not speak on behalf of the Company. We should always:  
**“State that the materials and opinions that we are posting are our personal views and not those of the Company”;**
- Take adequate precaution to ensure that we are not disclosing any confidential information about the Company; and
- Refrain from using any Company or third party logos or trademarks without express permission of the Compliance Officer.

## INVESTOR RELATIONS

- The Company recognizes the rights of its investors to information and it shall always be sensitive to this need. The relevant information will be speedily disseminated and shall be as informative as it is required to be, subject to considerations of confidentiality and applicable legislation.

- We should respect the rights of investors to express their views during investor meets, including General Meetings of the Company, on matters forming part of the agenda and on the performance of the Company. We should respond to their observations and queries to the best extent possible.
- No information shall be made available on a selective basis to specified groups of investors in a manner that places them at an advantage over other groups of investors. We shall always respond speedily and with courtesy to the Company's investors on matters relating to securities held by them in the Company. Any concern or violation should be reported to the Compliance Officer immediately.

## **EQUAL EMPLOYMENT OPPORTUNITY AND RESPECTING DIVERSITY AND HUMAN RIGHTS**

- We take pride in saying that we provide equal opportunity and inclusion for all employees through our employment policies and practices. We recognize that a mix of backgrounds, opinions, and talents enriches the organization and helps us achieve success.
- We celebrate the importance of diversity in our workplaces and hence, we strive to be as diverse as the customers we serve.
- We recognize the importance of maintaining and promoting fundamental human rights in all our operations. We provide fair and equitable salaries or wages, benefits, and other conditions of employment.
- We respect employees' right to freedom of speech and provide safe and humane working conditions.
- We strictly prohibit forced labour and child labour.
- We respect the individual and create a culture of trust and respect that promotes a positive work environment.
- We never discriminate or treat employees or job applicants unfairly and are committed to provide equal opportunity in employment. No decisions should be made on the basis of gender, race, colour, nationality, ancestry, religion, physical or mental disability, medical condition, sexual orientation, or marital status.

## **CONDUCT AT THE WORKPLACE**

- We should ensure that our behaviour with our fellow colleagues does not give an unprofessional impression about us at the workplace. Touching others inappropriately or in a way that can be regarded as vulgar should be avoided. We should always be humble, courteous, and behave in a decent and professional way.
- We are expected to be properly groomed and neatly dressed while at work, both when inside or outside the office premises.
- The Company does not encourage insinuations, half-truths, rumours and gossip, all of which attack the self-respect of the individual and/or attempt to divide the employees into groups.

## **FREEDOM FROM HARASSMENT**

- "Harassment" is behaviour that creates an offensive, intimidating, humiliating, or hostile work environment. Harassment may be physical or verbal, and may be done in person or

by other means (such as harassing messages or emails). Examples of such harassment include unwelcome sexual advances or remarks, offensive jokes and disparaging comments, sexually explicit graphics, pictures, videos, animation, etc. It is important to remember that harassment, sexual or otherwise, is determined by our actions and how they impact others, regardless of intentions.

- The Company sets a standard of **‘Zero tolerance’** for harassment. We are all responsible for ensuring that we avoid actions or behaviour that are, or could be, viewed as harassment.
- We view all incidents of ‘sexual harassment’ very seriously and encourage each employee to report any incidents of sexual harassment to the refer Prevention of Sexual Harassment (POSH).
- The Company management may initiate strict disciplinary action against any employee found guilty of any kind of sexual harassment.

## ENSURING HEALTH AND SAFETY

- We value each individual as an important asset of the organization and are committed to high standards of safety and protection.
- Each one of us has the responsibility to follow the Company’s safety and security procedures, as well as applicable laws and regulations at all times & usage of PPE’s as and where required. We should intervene and report immediately, if health and safety is compromised.
- We own and operate facilities with the necessary permits, approvals, and controls that are designed to protect health, safety, and the environment. Our contractors and other third parties are expected to commit to the same levels of health and safety protection.

## DRUGS AND ALCOHOL

- We are not permitted to use, possess, sell, transfer, manufacture, distribute, or be under the influence of illegal drugs or alcohol on Company workplace premises, while at work during working or non-working hours.
- We should not report to work while under the influence of, or impaired by, alcohol or illegal drugs or substances.

## ADHERING TO ANTI-VIOLENCE GUIDELINES

- With respect to the Company’s commitment to providing a safe work environment, we never engage in or tolerate any form of violence or bullying irrespective of the designation of the employee involved. We want to foster the kind of environment where people feel safe and are treated with respect and professionalism at all times.
- We are prohibited from engaging in any act on Company premises that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats, or any expression of hostility, intimidation, aggression, or ragging. We are also prohibited from possessing weapons at our workplace.

## PROTECTION AND RESPONSIBLE USE OF CORPORATE ASSETS AND INFORMATION TECHNOLOGY

- Everyone at the Company is personally responsible for safeguarding, securing, and protecting the Company's assets and information technology from theft, destruction, misappropriation, wastage and abuse. Our assets include property, time, proprietary information, corporate opportunities, Company funds, and Company equipment.
- Company assets must be used only for business purposes and to advance our strategic objectives. We are allowed occasional personal use of Company assets and information technology, as long as it does not compromise Company's interests, adversely affect our job performance or result in undue abuse of the Company's resources.
- Prohibited sites, unauthorized software and applications shall not be visited or used on company assets.

## PROTECT CONFIDENTIAL INFORMATION OF THE COMPANY, ITS EMPLOYEES, AND ITS BUSINESS ASSOCIATES

- During the course of work, we may have access to confidential information about the Company. 'Confidential Information' is generally non-public and/or personally identifiable information (refer glossary 11 for definition) that employees may be aware of as a result of their position with the Company and that might be of use to competitors or harmful to the Company if disclosed.

Common examples include:

- Customer lists
- Financial or non-financial information known as a result of one's position with the Company
- Terms, discount rates, or fees offered to particular customers or suppliers
- Marketing or strategic plans
- Trade secrets, including manufacturing and marketing processes and techniques
- Software, risk models, tools, and other systems or technology developments
- Names, contact addresses, email addresses, government IDs, credit cards, bank account details, photos, videos, or any combination of that information belonging to customers, vendors, and/or employees.

We should disclose confidential information only to:

- Fellow Company employees or third parties who have a legitimate clearance, on a 'need-to-know basis'
- Those who have a clear duty or obligation to keep the information confidential
- Those who have a legal obligation to disclose this information as required.

## INTELLECTUAL PROPERTY AND TRADEMARKS

We must respect the intellectual property (IP) (refer glossary 12 for definition) belonging to third parties, and may never knowingly infringe upon the IP rights of others.

We should be cautious when preparing advertising or promotional materials, using the name or printed materials of any other Company. When using a licensed software, only a software

which is adequately licensed by the publisher should be used on Company computers or to perform Company work.

## **ISSUANCE OF AND AMENDMENTS TO OUR CODE**

- The Board of Directors of the Company has assigned Compliance Officer, who will oversee the implementation of the Code, policies, and their compliance. It is also the responsibility of the CO to review the efficacy of these policies and suggest amendments to make them relevant to changing times. The CO is responsible for monitoring compliances with the provisions of this Code.
- Systems and policies should be clear and transparent, and shall be documented in manuals that serve as a valuable tool for learning and governance. The CO shall review the provisions of the Code from time to time and suggest such amendments as it considers necessary, to be relevant in changing circumstances.
- In case of any clarification, consultation, or any discussion required on any matters relating to the Code, we are encouraged to approach the Compliance Officer for the same.

## **INVESTIGATION OF REPORTED CODE VIOLATIONS**

- The Company takes all reports of potential violations seriously and is committed to confidentiality and a full investigation of all allegations by designated team (constituted by Compliance Officer).
- We are obliged to co-operate in internal investigations and failure to do so may result in disciplinary actions.
- The Company strives to:
  - Protect confidentiality of individuals involved, to the extent practical;
  - Inform the employee of accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation, typically when the information is complete, and clarification need to be sought from employee.
  - Where permissible, allow employees to review and rectify the information reported.

## **OBLIGATIONS OF LINE MANAGERS AND OTHERS RECEIVING REPORTS OF POTENTIAL CODE VIOLATIONS**

Line Managers and others who receive reports of potential Code violations play a very important role in upholding the Code. Our Company encourages us to talk to the Line Managers about our concerns. Line Managers and members should:

- Make sure that they comprehend the Code, and ensure their behaviour is consistent with the Code
- Let team members know that they are available to discuss and support them in their concerns
- Act to stop violations of the Code or the law by any team member
- Raise all concerns to the appropriate level and function
- Never let team members feel that their concerns are being ignored

- Ensure that no retaliation occurs against someone for reporting a suspected violation of the Code

## REPORTING VIOLATIONS

- The Board of Directors of the Company and the Compliance Officer will be responsible for ensuring that these principles are properly communicated and understood by all to whom these are addressed. The Company promotes open and honest communication. If we become aware of a breach or potential breach of our Code or of other legal requirements, we must report, whether it relates to us, our manager, or anybody else.
- We should seek guidance from the Compliance Officer for any matter relating to the Code. Any violation of the Code should be reported either to the Compliance Officer, Human Resource Representative of the function, Line Manager of the function or Board of Directors as laid down in the Approval Matrix of this Code. In addition to the above, a detailed Whistle Blower Policy is available on the website and may be invoked if required. Some examples of these issues include:
  - Accounting or auditing irregularities or misrepresentations
  - Fraud, theft, bribery, and other corrupt business practices
  - Antitrust or insider trading violations
  - Significant environmental, safety, or product quality issues
  - Illegal discrimination or harassment
  - Actual or potential conflicts of interest
  - Guidance on any national, regional, tribal, state or municipal legal requirements that apply to the Company or to our job

## DISCIPLINARY ACTION

- To maintain the highest standards of integrity, we must dedicate ourselves to comply with the Code, Company policies and procedures, as well as applicable laws and regulations. Individuals who fail to do so will be subject to disciplinary action.
- The disciplinary action will be decided depending upon the facts of the case and may include penalties, suspension, or even termination of employment. In addition, if deemed necessary by the management, appropriate regulatory authorities will be informed and involved as required and criminal or civil legal action may be initiated.

## SIGNATURE AND ACKNOWLEDGEMENT

All new and existing employees must sign an acknowledgement form on a periodic basis, confirming that they have read the Code and agree to abide by its provisions.

Failure to read the Code or sign the acknowledgement form does not excuse an employee from compliance with the Code.

## **WAIVERS**

Waiver of any provision of this Code, for officers of the Company, must be approved by the Compliance Officer.

## **NON-RETALIATION**

The Company does not tolerate any form of retaliation against any person who reports a suspected violation in good faith. In addition, no one who participates or cooperates honestly and completely in our Company's investigation will be subjected to retaliation for doing so. Anyone who retaliates against a person for making a good faith report or for participating in the investigation of a report, as described above, will be subject to disciplinary action.

## APPENDIX 1.

### GLOSSARY

#### 1. Who is a 'Line Manager'?

'Line Manager' means an employee's reporting manager/ supervisor of the function or above.

For all HOD's & Sr. Team Members, Compliance Officer or the Board of Directors shall be considered as the 'Line Manager' for this purpose.

#### 2. Who is considered to be a 'related party' under the Code?

Parties are considered to be related if at any time one party has the ability to control the other party or exercise significant influence over the other party in making financial and/or operating decisions.

'Control'

- Ownership, directly or indirectly, of more than one half of the voting power of an enterprise, or
- Control of the composition of the Board of Directors in the case of a Company, or of the composition of the corresponding governing body in case of any other enterprise, or
- Holder of substantial interest in voting power and the power to direct, by statute or agreement, the financial and/or operating policies of the enterprise.

'Significant influence'

- Participation in the financial and/or operating policy decisions of an enterprise, but not control of those policies.

#### 3. Who is considered to be a 'relative' under the Code?

'Relative', in general will mean individual, Company, associate, or firm with whom we, either directly or indirectly, may have a relation or interest, which can influence or even appear to influence our decisions made on behalf of the Company.

With reference to any person, it means anyone who is related to another, if:

- They are members of a Hindu Undivided Family.
- They are husband and wife; or
- One person is related to the other in such manner as under:
  - Father (includes step-father)
  - Mother (includes step-mother)
  - Son (includes step-son)
  - Son's wife – daughter-in-law
  - Daughter (includes step-daughter)
  - Daughter's husband – son-in-law

- Brother (includes step-brother)
- Sister (includes step-sister)
- Any other person deriving of their subsistence from the Company's employee

#### 4. What does 'bribery' and 'corruption' mean?

A 'bribe' is anything of value, including money, gifts and entertainment, other business courtesies, hospitality, or personal gratification given, offered, or received in an attempt to influence a person's behavior, in order to obtain or retain business, or to secure an unfair benefit or advantage.

'Corruption' is dishonest behaviour by those in positions of power, such as managers or Government Officials.

Corruption can include giving or accepting bribes or inappropriate gifts, under-the-table, diverting funds, laundering money, and defrauding investors.

#### 5. What are 'facilitation payments' and 'kickbacks'?

Facilitation payments are small expediting or 'grease' payments made to Government Officials to facilitate or expedite the performance of a routine, non-discretionary governmental action that a Government Official is already obligated to perform, such as issuing certain permits, licenses, visas and mail. Facilitation payments do not include any decision by a Government Official to award new business or to continue business with a Company.

A kickback is a form of negotiated bribery in which a commission is paid to the bribe-taker as a Quid Pro Quo for services rendered. Generally speaking, the remuneration (money, goods, or services handed over) is negotiated ahead of time. The kickback varies from other kinds of bribes in that there is implied collusion between agents of the two parties, rather than one party extorting the bribe from the other. The purpose of kickback is usually to encourage the other party to cooperate in the illegal scheme.

#### 6. What does 'gifts and entertainment' mean?

'Gifts and entertainment' include anything of monetary value offered/received by an individual either directly or indirectly for the purpose of expressing gratitude. Gift includes cash and non-cash items, some examples of which are: artwork, watches, jewelry, equipment, services, prizes, gift vouchers, donations to charities, use of vacation facilities, stocks or other securities, home improvements, tickets/invitation to sports, cultural or any other event. However, this does not include reasonable expenditure incurred on account of routine business courtesies offered to or received by any business partner as a customary trade practice (e.g. providing transportation, meals, accommodation, etc.).

#### 7. What is 'sensitive information'?

'Sensitive information' can include legal agreements, technical specifications, or any other information which is unlikely to be publicly known and may have commercial value.

#### 8. Who is included in the term 'stakeholder'?

‘Stakeholder’ includes:

Shareholders, bankers, dealers, media, government, business partners, competitors, approving agencies, service centers, society, outsourcers, auto analysts, legal advisors, professionals, consultants, auditors, courts, analyst, and rating agencies.

9. What is ‘fraud’?

‘Fraud’ in relation to affairs of a Company or anybody corporate, includes any act, omission, concealment of any fact or abuse of position committed by any person or any other person with connivance in any manner, with intent to deceive, to gain undue advantage from, or to injure the interests of, the Company or its shareholders or its creditors or any other person, whether or not there is any wrongful gain or wrongful loss.

‘Wrongful gain’ means the gain by unlawful means of property to which the person gaining is not legally entitled.

‘Wrongful loss’ means the loss by unlawful means of property to which the person losing is legally entitled.

11. What is personally identifiable information (“PII”)?

PII is defined as any information that identifies an individual such as name, physical address, email address, government IDs, credit cards or bank account details, photo, video, or any combination of that information that might identify an individual.

12. What is ‘intellectual property’?

‘Intellectual property’ includes any Company owned information like:

patented inventions, designs, copyright materials, trademarks and unpatented service marks, trade secrets and know-how, sales, marketing and other corporate databases, marketing strategies and plans, research and technical data, business ideas, processes, proposals or strategies, new product and/or package design, and development software bought or developed by the Company, or information used in trading activities including pricing, marketing, and customer strategies.

### ***Our Code at a Glance***

	<b>Do’s</b>	<b>Don’ts</b>
<b>Maintaining ethical business Standards</b>	<ul style="list-style-type: none"> <li>▪ Seek approval for any outside jobs and affiliations.</li> <li>▪ Comply with requirements for giving and receiving gifts and entertainment.</li> <li>▪ Seek approval for any dealings with relatives / related parties / related party of relatives.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Hire relatives in the same chain of command or function.</li> <li>▪ Accept favors from vendors, customers or suppliers.</li> <li>▪ Hold significant investment in business associates of the Company.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Follow anti-bribery and anti-corruption</li> </ul>	<ul style="list-style-type: none"> <li>▪ Bribe or offer/receive kickbacks.</li> </ul>
<p><b>Commitment to business associates, suppliers, customers, and environment</b></p>	<ul style="list-style-type: none"> <li>▪ Treat customers fairly, ethically, and comply with all applicable laws.</li> <li>▪ Treat suppliers and subcontractors with fairness and integrity.</li> <li>▪ Respect terms and conditions of agreements with suppliers, and honor commitments.</li> <li>▪ Meet regulatory requirements with respect to health and environment.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Flout product quality and safety standards, laws, and regulations.</li> <li>▪ Participate in acts that violate competition laws.</li> <li>▪ Overstate or misrepresent product quality.</li> </ul>
<p><b>Commitment to stakeholders</b></p>	<ul style="list-style-type: none"> <li>▪ Comply with all applicable laws and regulations.</li> <li>▪ Understand and follow the Company’s record retention policy.</li> <li>▪ Maintain accurate records.</li> <li>▪ Recognize and report fraud, falsification, and manipulation.</li> <li>▪ Respect the rights of investors.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Falsify any document, record, or transaction, whether it is financial or non-financial.</li> <li>▪ Disclose confidential information.</li> <li>▪ Communicate on behalf of the Company unless authorized.</li> </ul>
<p><b>Behaviour at the workplace</b></p>	<ul style="list-style-type: none"> <li>▪ Comply with all the required laws.</li> <li>▪ Immediately report any violation of Code.</li> <li>▪ Respect the diversity of people.</li> <li>▪ Respect Human Rights.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Discriminate.</li> <li>▪ Entertain any type of harassment.</li> <li>▪ Perform unsafe activities.</li> <li>▪ Work under the influence of illegal drugs or alcohol.</li> <li>▪ Indulge in violence.</li> <li>▪ Employ child labour.</li> </ul>
<p><b>Protection of assets and information management</b></p>	<ul style="list-style-type: none"> <li>▪ Safeguard, secure, and protect</li> <li>▪ Company assets and information technology.</li> <li>▪ Understand and follow the Company’s IT security policy.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Provide confidential data or non-public information to anyone inside or outside of the Company without ensuring that it is appropriate to do so.</li> <li>▪ Infringe upon Intellectual Property rights of others.</li> <li>▪ Abuse Company resources.</li> </ul>