	<b>People Policies</b>	<b>CODE OF CONDUCT</b>
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**PREAMBLE:**

- This code of conduct reflects our Vision & Values and our commitment to all our stakeholders like employees, customers, business partners, suppliers, competitors, government, public officials, and the wider community.
- The code of conduct aims to maintain and foster a culture of high standards of business ethics, personal integrity, honesty, accountability, and compliance across our business.
- The company respects the local, state, and national laws in the countries the company operates.
- The Code will be administrated in accordance with local, state, and national laws. Compliance with all applicable laws and regulations is an absolute must and non – negotiable.
- An employee code of conduct is a set of principles that gives direction on rules and regulations related to the Code of Conduct.
- The Code of Conduct will reflect our Company’s Vision and Values.

**OUR VISION:**

To exceed customer expectations by providing world-class quality products and ensure prosperity to all the stakeholders through Trust, Value, and Service.

**OUR VALUES:****AGILITY**

- ✚ Being mindful of the changes around us.
- ✚ Renew ourselves fast and adapt to the market conditions.
- ✚ Execute with efficiency - on Time in Full.
- ✚ Embrace new technology and go digital.
- ✚ Be ready to grab the opportunities and overcome the challenges.
- ✚ Learn and update consistently.

**INNOVATION**

- ✚ Foster creativity & Innovation
- ✚ Encourage new ideas and thoughts.
- ✚ Be unconventional and unique.
- ✚ Think ahead of our time.
- ✚ Be a technology leader.

**CUSTOMER CENTRICITY**

- ✚ Customer is our first in all our transactions, product and business decisions.
- ✚ Protect and grow our market share through customer value and customer delight.
- ✚ Process standardization and process centricity to better the customer experience through TQM way.
- ✚ Create trust & confidence in our customers through on-time delivery and high-quality products.

**ACCOUNTABILITY & OWNERSHIP**

- ✚ Goal orientation – Clarity in setting and owning up the goals.
- ✚ Result orientation-Taking responsibility for the result and outcomes.
- ✚ Timeline and deliver adherence (Ontime in Full)
- ✚ Walk the talk. Create and nurture trust.
- ✚ Empower self / team towards and drive high performance.

**1) PURPOSE**

- This Code of Conduct is the first step for an employee to get clarity on any questions relating to right conduct.
- It sets forth our core values, shared responsibilities, global commitments, promises and general guidance about the Company's expectations.

**2) SCOPE**

It applies to all our employees of TVS Srichakra Limited (TSL)

**3) EFFECTIVE DATE**

This comes into effect from 29.06.2024.

**4) FAIR LABOUR & EMPLOYMENT PRACTICE****• EMPLOYMENT RELATIONSHIP**

- Employees must adopt and adhere to rules and regulations of employment.
- The company respects the rights of all employees.

**• NON – DISCRIMINATION/ ANTI-HARASSMENT**

- No employee shall be subject to any discrimination in the course of employment.
- Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment.

**• WORK ENVIRONMENT – HEALTH & SAFETY**

- The company provides a work environment free of coercion, discrimination, and harassment to help employees to lead a healthy and safe work experience.
- Employees will be provided with an environment that prevents accidents and incidents.
- All forms of substance abuse as well as the use or distribution of tobacco, drugs, and alcohol while at work are strictly prohibited.

**• FORCED LABOUR/CHILD LABOUR:**

- There shall be no use of forced labour.
- No person shall be employed under the age of 18.

**5) ETHICAL CONDUCT:**


- Employees will maintain a culture of high ethical and professional standards. They are also expected to:
- Conduct business operations in compliance with competition laws and principles of fair market practices.
- Not to conduct in a manner that may bring disrepute to the office or tarnish the reputation and image of the Company and its Product & Services.

**6) ANTI-RETALIATION POLICY**

- The company encourages the employees to ask questions and raise matters without fear of retaliation.
- The company is also committed to treating violation reports with care and investigating them thoroughly.
- The company values the employees who help in preventing and uncovering possible misconduct and does not tolerate retaliation against anyone who reports suspected misconduct or otherwise assists with an investigation or audit.
- The company believes sharing a good-faith concern about the Code, even if it turns out to be unfounded, is never an excuse for any kind of retaliation.

**7) BUSINESS PRACTICE****a) CONFLICT OF INTEREST**

- Employees are expected to use their judgment and act in the Company's best interests while performing their job.
- To avoid conflicts or anything that could appear as a conflict, between an individual's own interests and the Company's.
- Every business decision should be made objectively and with the Company's business interests in mind.
- Not to engage in any business or actions which create Conflict of Interest.
  - For example, when considering a certain course of action, and if it is giving personal benefit either to self or to family or to close friends or to their associated business, then it must be avoided. In case the business is critical

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to the company, then a declaration must be made to the management before taking a decision.

- To avoid accepting any gifts or any favours from the customers, clients and anyone with whom we have business connections.
  - In the event of unavoidable circumstances, if any employee receives any favour that must be submitted to the concerned authorities as per existing policy, which will be used for charity purposes.
  - If in case of any eatable, it can be disturbed in their respective workplace.

**b. INTERACTION WITH THE GOVERNMENT**

- When conducting business with the respective country’s Government, employees must understand the rules by which it operates.

**c. POLITICAL ACTIVITIES**

- Our Company doesn’t support any political parties/activities.
- Any individual who is participating in political activities voluntarily and any such involvement must not be done in a manner to cause or use the resources of the company (including the employee’s time to work) nor should it be represented to appear as though your personal political views endorsed by the company.

**8) ANTI-BRIBERY AND FACILITATION PAYMENTS**

- A breach of anti-bribery laws may result in legal and financial consequences; hence employees are advised to act as per law.
- Every employee should keep in mind that even the appearance of illegal conduct could significantly damage our reputation.
- To uphold high standards and values of honesty and integrity, the company takes a zero-tolerance approach toward bribery and corruption of any kind.
- The company never offers or accepts any favour in order to get business or continue business running or gain any unfair advantage.

All employees must follow anti-bribery and anti-corruption laws in all their activities and never offer, pay, promise to pay, or accept anything of value, either directly or indirectly, in order to improperly influence other people’s judgment or actions.

## 9) ANTI-MONEY LAUNDERING

- The company complies with all applicable laws and regulations aimed at combating money laundering and terrorist financing. “Money laundering” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.
- The company expects all employees acting on the company’s behalf to comply with these laws, support the company in making the right decisions in line with the corporate position, and report the concerns if it becomes aware, or suspects, the existence of a money-laundering matter which might be linked to the business.

## 10) EXPORT CONTROLS AND TRADE SANCTIONS

- The company is committed to ensuring these business transactions are accomplished in full compliance with applicable sanctions and trade control laws.
- The company expects all employees acting on the company’s behalf to comply with these laws, support the company in making the right decisions in line with the corporate position, and report if they become aware or suspect, the existence of a sanction compliance concern which might be linked to the business.

## 11) PROTECTION OF INTELLECTUAL ASSETS

- **PROTECTION OF COMPANY PROPERTY**
  - All employees should treat our Company’s property, either tangible or intangible, with respect and care.
  - Employees shouldn’t misuse Company equipment or use it frivolously and should respect all kinds of incorporeal property. This includes trademarks, copyright and other assets including intellectual property.
  - Employees should use company properties only to complete their job duties. Use of our assets for individual profit is prohibited.
- **FINANCIAL INTEGRITY AND ACCOUNTING**
  - Employees must not engage in any actions that could result in conveying false or inaccurate financial information about our Company or our clients.

- **COMPANY CONFIDENTIAL INFORMATION**

- Confidential information includes all non-public information and personal information of any employees obtained from any source during business.
- Employees are required to protect confidential and other proprietary information, failing which strict action as deemed fit will be taken.

- **RESPONSIBLE SOCIAL MEDIA USAGE**

Employees are required to comply with applicable laws and government guidelines governing social media. When using any form of social media,

- They must comply with this Code of Conduct.
- Not to disclose any confidential information about the Company or any of its employees, contractors or third-party vendors.
- Company does not encourage employees to share and be part of any political or social propaganda on behalf of the Company unless specifically asked to do so.

## 12) REPORTING CONCERN

- When an employee senses that something is not right at work or sees something or hears about an act that may violate the company's code, policies, and law, the employees have the responsibility to share their concerns by reporting right away.
- To report issues and to raise concerns you have the following options.
  - a) Discuss with the supervisor.
  - b) Contact the HR department.
  - c) Use company-approved methods specified in the policies like whistleblower policy.
- The company recognizes the early detection and reporting of wrongdoing depend on maintaining a culture of openness, trust, and integrity in which employees are:
  - Encouraged to report actual or potential; wrongdoing as soon as possible, knowing that their concerns will be taken seriously and that appropriate action will be taken
  - Trust the speaking up process is confidential and has no tolerance for victimization, retaliation, retribution, or detrimental treatment of any kind.

- It is a very serious matter to raise a concern that the employee knows to be false, We do not tolerate knowingly false accusations, peddling lies to investigators, or refusal to reasonably cooperate in an investigation- and these actions may also be determined to be a violation of the code.

### 13) MISCONDUCT

The following actions of omission and commission inter alia, shall be treated as misconduct.

1. Theft, fraud, forgery, embezzlement, misappropriation, dishonesty in connection with the business or property of the Company or property of another employee within the premises of the company.
2. Taking bribes or any illegal gratification.
3. Making use of one's position in the company to influence business associates or others connected with the company business for personal gains.
4. Acting in a manner prejudicial to the interest of the company.
5. Willful insubordination or disobedience, whether or not in combination with others, of any lawful and reasonable order of superior.
6. Absence without leave or overstaying the sanctioned leave without sufficient reasons or proper or satisfactory explanation.
7. Habitual late or irregular attendance.
8. Neglect of work or negligence in the performance of duty including malingering or slowing down of work.
9. Willful damage to any property of the company or to work in process.
10. Interference or tampering with any safety devices installed in the premises of the company.
11. Drunkenness or riotous or disorderly or indecent behaviour in the premises of the company or outside premises where such behaviours are related to or connected with the employment.
12. Smoking within the premises of the establishment except in the places notified.
13. Commission of any act which amounts to a criminal offence and sexual harassment involving moral turpitude.




14. Breach of rules notified, or violation of procedures laid down in connection with the company's business.
15. Abetment of or attempt at abetment of any act which amounts to misconduct.
16. Commissioning of any act subversive of discipline or good behaviour.
17. Non-observance of any safety precautions or rules.
18. Engaging in trade within the premises of the establishment including lending or borrowing money to and from other employees of the company.
19. Unauthorized use of the Company's premises and facilities.
20. Threatening, abusing, assaulting and obstructing employees in discharge of their duties or instigating other employees to act against the company which also includes threatening employee's families.
21. Malicious false allegations against an employee.
22. Violation of conduct rule made by the company.
23. Unauthorized disclosure of secret/official information of the company.
24. Absence from the appointed place of work or leaving the workstation without permission from the departmental head or without sufficient cause.
25. If any employee is involved in any act that brings disrepute in any form to the company or officials or products or fellow employee's this will be construed as misconduct.
26. Suppression of information, fudging and manipulation of data.

The above misconduct is only illustrative. This Code of conduct is not exhaustive; hence it has to be read along with the other rules & regulations and HR Policies.

#### **14) DISCIPLINARY ACTIONS**

Company will take appropriate disciplinary action as deemed fit which will range from warning to termination of service depending upon nature of violation against such employees who fail to adhere the Code of Conduct.

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## 15) COMPLIANCE WITH LAW

We need to comply with all laws, whether local, national, or regional, without any violation. All our employees, and those acting on our behalf, must protect the Company's interest. Employees are expected to exhibit an ethical and responsible way of behaviour when dealing with our company's finances, products, partnerships and public image or any other stakeholders.

In any case of doubts or questions, the employees are free to seek advice from the company. In addition, the employee is also responsible for reporting any misconduct as enumerated in this code of conduct.

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