



CODE OF BUSINESS CONDUCT

PREAMBLE



TVS Supply Chain Solutions is committed to maintain high standard of ethical conduct. This code of business conduct (“Code”) reflects the business practices and the principles of behaviour that support our commitment and sets out the expectations for all our employees’ working relationships - with other employees, customers, business partners, suppliers, competitors, governments, public officials, and the wider community. The Code is aimed at maintaining and fostering a culture of high standards of business ethics, personal integrity, honesty, accountability and compliance across our business.

This Code applies globally, to all TVS Supply Chain Solutions legal entities, subsidiaries, affiliates, joint-ventures and other business associations that are effectively controlled by TVS Supply Chain Solutions, directly or indirectly (“company”). It applies globally to all individuals working at all levels and grades for the company, including senior managers, officers, directors and employees (whether permanent, fixed-term or temporary), wherever located.

We respect the local, state and national laws in the countries we operate. The Code will be administered in accordance with those local, state and national laws. Compliance with all applicable laws and regulations are an absolute must and non-negotiable.

The Code cannot cover guidance on every situation and circumstances, particularly as laws and regulations differ between countries. If specific situations are not expressly covered, the spirit of the Code must be upheld by exercising common sense and good judgement, always in compliance with applicable laws and regulations. Additionally, we all must adhere to company’s internal policies, procedures, rules and regulations as they apply in a given situation.

Our responsibilities include helping to create and maintain a culture of high ethical standards and commitment to compliance. We must strive to maintain a work environment that encourages culture of openness and accountability in order to prevent any conduct or practices that could be in contradiction with the Code, our policies or the applicable law, and to address them whenever they do occur.



The Code of Business Conduct is our guidebook for putting our values into practice. TVS stands time-tested for upholding Trust, Value and Services as its core principles for over a century now. The brand, over the years, has maintained a very high level of integrity and etiquette and now it is our responsibility to work towards further strengthening the brand values. Having a strong set of values that respect people, society, and the planet, has always been at the heart of TVS SCS, and this will continue to be critical as we build our future-fit company.

We are already a Global organisation and it is extremely important and critical for us to have a unified set of Code by which we conduct our business. At the same time, as we expand further and induct new people into the organisation; new vendor into the ecosystem; work with different agencies across the globe; it is imperative that all of us follow the right practice and set the right example.

While success will be determined by performance, it is important to keep in mind how we go about enabling that success – honesty, dignity and operating with the highest level of ethics and integrity in everything we do.

I trust that every TVS SCS colleague will continue to not only comply with the laws and regulations that govern our business interests around the World, but will continue to set new standards of ethical conduct that will generate deep respect among our stakeholders.

Let us rely on this Code and our shared values to guide our behaviour every time and everywhere, thereby making TVS SCS a role-model company to work for and to work with.

This Code is not a static document and we will continuously update it based on feedback and the changing regulations. While practices may change, our core values will remain the same as practised over decades.

Thank you.

Ravi Viswanathan
Joint Managing Director

OUR CORE BUSINESS PRINCIPLES INVOLVE:



TRUST

Building trust with employees, customers and community.



VALUE

Creating business value to all the stakeholders and serve customers for life through continuous value addition.



SERVICE

Excel in operational process.



INNOVATION

Continuously innovate using technology to make life easy for our customers.

MAKING GOOD DECISIONS



How Can You Use This Code To Make Good Decisions?

Making good decisions and ethical choices is critical to our business. Trust with customers and between each of us and the people we interact with is built on such choices. In our constantly changing and diverse global environment, not all situations you encounter are straightforward - how do you make the best choice when facing difficult or unclear circumstances? How do you navigate ethical dilemmas?

While this Code cannot tell you exactly what to do in every situation, it serves as a guide to help you make good decisions and navigate complex situations where the answer might not always be clear.

When faced with difficult decision or situation follow these simple steps:

Pause

- Does a situation make you feel uncomfortable?
- Are your instincts telling you something is not quite right?
- Pause before acting and reflect on how you should approach the situation.



MAKING GOOD DECISIONS

Reflect

- Is this action the right thing to do for the company as a whole – not just a certain individual or group?
- Is your action or decision aligned with this Code and company policies?
- Is this action legal?
- Would you be comfortable if your action was reported in the media or made public?
- Would you be comfortable explaining your behaviour to your family and friends?
- Is it something you'll be willing to be held accountable for?

Ask

- Whenever in doubt raise your concerns and get help. Talk to your manager or a member of your human resource or legal teams. With them you can find the help you need to take the right decision.



REPORTING CONCERNS



When you sense that something is not right at work or see something or heard about an act that may violate our Code, our policies, or the law, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred.

In today's environment, employees remain our first and best line of defence to wrongdoings. When you report concerns or incidents promptly, you help us address the issue and resolve it, ideally before it becomes an actual violation of law or a risk to health, security, safety, or the reputation of the company, and remedy situations that have already happened. You also help build trust with each other and with our customers, suppliers, and other business partners.

To report issues and to raise concerns you have the following options:

- Discuss with your direct manager/ supervisor.
- Contact your human resources or compliance or legal department representative.
- Use the email address: **ethics.help@tvsscs.com** for reporting purposes.
- We recognize that 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; and trust that the speaking up process is confidential and has no tolerance for victimisation, retaliation, retribution, or detrimental treatment of any kind.



REPORTING CONCERNS



Do not fear retaliation

When you report a concern, you must feel assured that there will be no retaliation or other negative consequences. You should feel free to report any suspected violation of the Code, any company policy or applicable law without fear of your employment being adversely affected. We do not tolerate acts of victimization, retaliation, retribution, or detrimental treatment of any kind against anyone who reports a possible violation in good faith based on reasonable grounds or against anyone who participates in an investigation into a potential violation.

Reporting a good-faith concern about Code violation honestly, even if it turns out to be unfounded, is never an excuse for any kind of retaliation. We interpret victimization, retaliation, or retribution broadly, and such detrimental treatment might include threats, violence, harassment, demotion, a reduced salary, job reassignment, or any other form of discriminatory behaviour.

False Allegations

It is a very serious matter to raise a concern which you know to be false. We do not tolerate knowingly false accusation, peddling lies to investigators, or refusal to reasonably cooperate in an investigation - and these actions may also be determined to be a violation of our Code.

When a code violation occurs

When one of our employees fails to follow our Code or applicable laws, ignores someone else's failure to follow the Code, pressures someone else to violate the Code, improperly or negligently supervises a person who commits a violation, or engages in retaliation - a violation has occurred. This can harm the company's reputation and our bottom line, besides subjecting the company to legal fines and other penal consequences.

We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including termination of employment. If an act violates the law, it could also result in fines or criminal prosecution. Code violations may also be documented in your employee record.

LEADERS AND MANAGERS



Leaders and managers of the company have responsibilities for setting the culture of ethical business practices and a trustworthy work environment. The way you make decisions, handle concerns, difference of opinion and even bad news, will set the foundation for trust within your team. Remember that the success of your team depends on the trust you build together. The best way to lead, is setting the right example.

Here is a short guide you should use to build a culture of ethics and integrity in your team:

- Talk to your team about ethics and integrity. Be clear that the company is expecting their work is to be done ethically and in compliance with applicable company policies, laws and regulations.
- Be open and listen to your team with respect, even when they have something difficult to tell you and even if you disagree. Show that you are committed to solving the problem.
- Lead by example by demonstrating how you take ethical decisions.
- Explain to your team that for results to matter, they must be achieved the right way.

In the company all of us are accountable for complying with the Code. If you are unsure how to approach an issue or whether it merits escalation, talk to a member of your human resource or legal departments.



HUMAN RIGHTS



Respect for human rights is one of the company's fundamental values. We recognize the important role that business plays in society and the responsibility we have in helping to ensure human rights are respected.

Through our actions and policies, we strive to respect and promote human rights by upholding the UN Guiding Principles on Business and Human Rights in our relationships with our employees and suppliers.

Our aim is to help increase the enjoyment of human rights within the communities we operate, and we are committed to fulfil our corporate responsibility by developing procedures to identify, prevent, mitigate and remedy adverse human rights impacts.

We expect all employees and suppliers to avoid causing or contributing to human rights infringements through their business actions. We follow a zero-tolerance approach with respect to gross instances of human rights violations.



HEALTH, SAFETY AND ENVIRONMENT



We are committed to conducting our business in a manner designed to protect your health, safety and environment. We recognize our responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions that are safe, healthy and comply with all statutory requirements and codes of practice. We recognize the need to enlist your active support at every level in achieving satisfactory standards. Towards this end, you must:

- Comply with all relevant laws, regulations and company policies for maintaining a safe and healthy work environment.
- Take responsibility for your own safety and health and others who may be affected by your actions.
- Immediately inform management and others who have responsibility for safety and health if you become aware of anything that may pose a safety or health concern for others (including customers or visitors) or an environment hazard.
- Contribute to maintaining a workplace free from aggression, threats, intimidating behaviour or any other act of violence.
- Alert the appropriate security in charge or management about individuals who are on our premises without proper authorization.
- Refrain from carrying any kind of weapons or hazardous materials to work or into our premises.

You must not deal with, or to be in possession of or under the influence of drugs (the exception being a case where the drugs are consumed for a recognised medical condition and under prescription) while at work or on company premises. It is also a criminal offence to use, possess or deal in any controlled substances in violation of local law.



FAIRNESS, DIVERSITY AND INCLUSION



We strive to create and maintain a work environment in which people are treated with dignity, decency and respect. We should not subject our employee and others that we work with to any unfair treatment on any basis contrary to applicable law or company policies.

You have the right to work in an environment that is free of any form of intimidation, harassment, violence or threats of violence. Any act or threat of violence, and any verbal or physical conduct that creates an intimidating, offensive, abusive or hostile work environment is unacceptable and is taken with utmost seriousness.

Such acts may take many forms and can be verbal, physical, visual or sexual in nature. It might look like intimidation, bullying, racial slurs, sharing offensive material or making offensive or sexual jokes, comments or requests. Through enforcement of relevant company policies on anti-harassment and by providing education on the subject, we seek to prevent, correct and discipline behaviour that violates such policies. You should report any form of harassment you have been subject to or have witnessed.

We are committed to equal opportunities among all our employees. We will not tolerate any kind of discriminatory behaviour based on race, caste, religion, colour, language, ancestry, marital status, gender, sexual orientation, age, national origin, indigenous status, disability, veteran status or any other characteristic protected by law. You must co-operate in maintaining a workplace free of discrimination.



We take our responsibility and obligations towards our customers, business partners and employees seriously when collecting, using and processing any personal information.

We are committed to using personal data entrusted to us only for legitimate business purposes, and must endeavor to protect it from possible loss, misuse or unauthorized disclosure.

Personal information is any information that can, itself or along with other available information, identify an individual or which relates to an identifiable individual, for example, name, government identification number, email addresses, telephone numbers, employee ID number, credit card information, financial information, medical information and IP address.

Keeping personal information secure is critical to our people, our business and our reputation. You must recognize this responsibility and follow the laws requiring us to protect personal information. If you work with personal information as part of your job, you must guard this information well and follow company's policies regarding access, use and transfer of this information. High standards must be ensured with regard to data quality and technical protection



against unauthorized access. The use of the personal information must be transparent for those concerned and their rights must be safeguarded in accordance with applicable privacy laws and regulations with regard to collection and use of personal information and, as applicable, to objections pertaining to blocking and deletion of such information.

In some jurisdictions there are strict laws and regulations pertaining to the collection and use of personal information. You must abide by such laws, to the extent they are applicable, to protect the privacy of others and respect their rights.

Please know that certain personal information can be sensitive and require an extra level of protection and a higher duty of care based on applicable law.

When collecting, using or storing personal information you must:

- Only collect personal information that is necessary and relevant and use it solely for the purpose for which it is collected
- Access only the limited amount of personal information that you need to do your job, and only share it on a need-to-know basis with authorized people who also need the information for completing their work. Never share it with any unauthorized person outside of our company or anyone in the company who does not require use of such information to complete their job.
- Obtain advice from compliance, legal or human resources team before transferring personal information outside the country in which it is collected, as there may be legal restrictions/requirements relating to the transfer.

If you are not sure whether you are handling any personal information or whether your use is in accordance with the law and company policies, ask your manager or contact the compliance, legal or human resources team.

FAIR COMPETITION



We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information about competitors through improper means, possessing trade secret information that was improperly obtained or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests.

You shall not disclose confidential information or trade secrets from a prior employer or request others to do so. Competition laws are complex and can be difficult to interpret, particularly because the rules can differ from country to country and from case to case.

If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions or doubts about the legality of proposed information gathering or as to the application of any competition or anti-trust laws, you must consult and report to your manager and to your human resource, compliance or legal teams for guidance.

Compliance with competition laws is a serious matter and is expected of you. Any violation of these laws may subject you and the company to fines and legal proceedings.



BRIBERY AND CORRUPTION



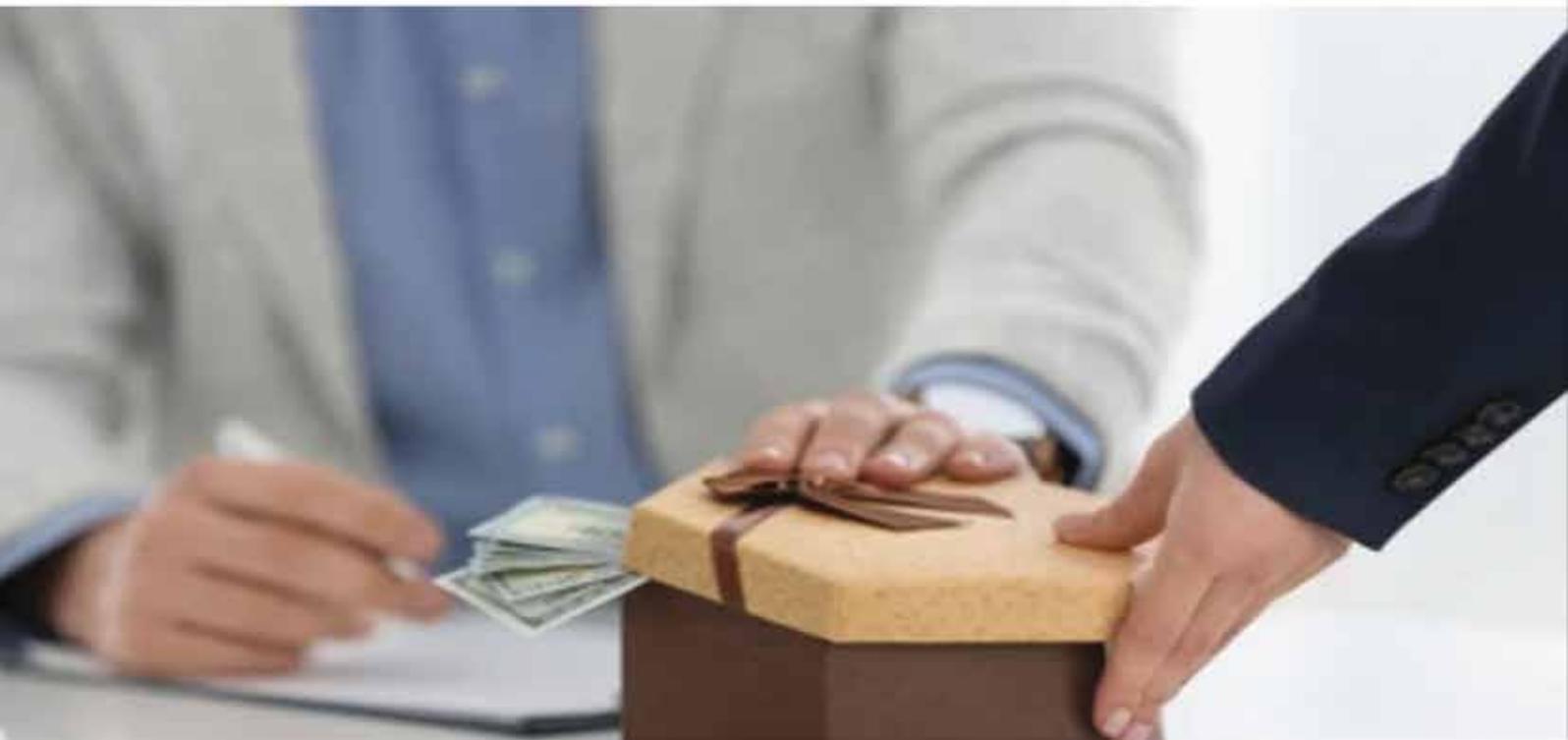
We retain a zero-tolerance approach towards bribery and corruption. And we never offer or accept anything of value in order to get business, keep business or gain an unfair advantage.

Such conduct is incompatible with our values and highly damaging to our good name, reputation, and image.

We are fully committed to complying with anti-bribery and anti-corruption laws in all countries in which we operate.

It is crucial that you act with honesty and integrity at all times, wherever you conduct business on behalf of the company.

In this regard, remember that, as a company, we are not only responsible for the actions of our employees, but also for the actions of anyone who represents us.



ANTI-MONEY LAUNDERING



We comply 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.

We expect all employees, contractors, and other third parties acting on the company's behalf to comply with these laws, support us in making the right decisions in line with the corporate position, and report their concerns if they become aware of, or suspects, the existence of a money-laundering matter which might be linked to the business.

You should take the time to know who you are doing business with and their reputations for following the law, by performing appropriate due diligence and screenings. Warning signals to proactively spot suspicious transactions and activities could include – transfer of payments to or from entities or countries not related to the transaction, customers or suppliers providing incomplete information or avoid recordkeeping requirements, large payments in cash, exchange many small denomination bills for a large one, and circumventing normal process in order to process a transaction.



EXPORT CONTROLS AND TRADE SANCTIONS



We comply with all applicable economic and trade sanctions laws in our operations, including export controls, trade restrictions and embargoes, and other legal and economic sanctions that restrict activities with certain countries, entities, or individuals worldwide.

We are committed to ensuring that these business transactions are accomplished in full compliance with applicable sanctions and trade control laws.

We expect all employees, contractors, and other third parties acting on the company's behalf to comply with these laws, support us in making the right decisions in line with the corporate position, and report if they become aware of, or suspects, the existence of a sanctions compliance concern which might be linked to our business.

In case of any doubts on the applicability of export control provisions, please reach out to your finance or legal teams.



CONFLICT OF INTERESTS

A conflict of interest arises when our personal relationships or financial interests interfere with our ability to objectively perform our job. In case you are facing a situation that could become a conflict of interest, you should act in the best interests of the company. This includes avoiding business dealings between the company and a family member or a business in which you or a family member has a substantial interest or benefit.

You should also avoid personal relationships at work that improperly influence sound and objective decision making. Full disclosure and written approval from your human resource department (or any committee/officer nominated for this purpose by the company) is required for any activity, transaction, or relationship that could create the appearance of a conflict of interest before you or your family member or partner undertake the activity.

If the activity is already taking place, disclosure is still required. You must also comply with any additional requirements under applicable company policies and procedures that deal with disclosure of conflict of interests or similar aspects.



CONFLICT OF INTERESTS



Conflict of interests take many different forms. Here are some examples of instances which are more common:

- Improper personal benefits by a member of your family as a result of your position in the company;
- Outside consulting opportunity, advisory role or a business activity that detracts your ability to devote appropriate time and attention to your responsibilities with the company.
- Any consulting or employment relationship between you and any customer, supplier, business associate or competitor of the company;
- Outside speaking or presentation opportunity (e.g. at a conference) where you are offered honorarium or other payments including reimbursement of expenses in connection with this particularly when your speech or presentation is part of your job with the company or described your work for the company or you are introduced as an employee of the company;
- Giving or receiving non-nominal gifts or excessive entertainment that could affect the company's business decisions;
- Ownership or financial interest held by you or by a member of your family in a competitor or supplier of the company; or
- Hiring or supervising immediate family members or partners.

In such situations you should be scrupulous in avoiding conflict of interests with the company. Beyond family member, be careful that your relationships with other relatives and friends do not interfere with your ability to make decisions on behalf of, or otherwise do your job for, the company, as these other close relationships may also create a conflict.

If you are unsure if a personal relationship creates the appearance of a conflict, contact your human resource department (or any committee/officer nominated for this purpose by the company). Always err on the side of disclosure.

GIFTS AND ENTERTAINMENT



The act of exchanging business gifts and corporate hospitality can play a healthy role in building business relationships.

However, gifts and hospitality are problematic if they create actual or perceived conflicts of interest, or otherwise appear to influence a business decision. An overly generous gift can pressure the recipient to return the favor or feel indebted to the giver – with decisions that benefit the giver and create a conflict of interest or perception of a conflict of interest.

Giving or accepting gifts, hospitality, travel, discounts, favours, or services is prohibited where it could, or could appear to improperly influence a person's business decision. At times it can be difficult to tell when a gift crosses the line, and laws and customs in different countries vary widely, however you need to recognize when an offer is excessive – no matter if you are the giver or the recipient.

We expect you to:

- Never request or offer, and if offered decline, gifts, meals, entertainment, favours or anything of value from current or potential suppliers, customers or other business partners if it would create an actual or the appearance of a conflict of interest or could be perceived as intended of achieving improper influence in relation to a business decision.



GIFTS AND ENTERTAINMENT



- Never, under any circumstances, accept commissions or improper payments from our suppliers, customers, or other business partners.
- Only accept a gift or advantage if it is modest in value or a token items like a pen, diary, logo branded item or symbolic items like a modestly priced trophy or if the item is approved for a large group of employees. Similarly, sharing meals and entertainment is common in business, so you may accept them if they are occasional and costs are reasonable and customary, and if the other party (supplier, customer, or other business partner) also attend.
- Consult with your manager and the management if you receive an offer of paid travel to an out-of-town location or to a premium event like the Olympics, World Cup or an award show. Together you can determine if there is a good business reason for you to attend, in which case the company should pay, at a minimum, for your travel (airfare and lodging) and any other expenses deemed appropriate.
- Be sure that the gift, meal or entertainment that you intend to offer to your business contact supports a legitimate business purpose and is reasonable and appropriate under the circumstances. Always be mindful that our business partners have their own rules on receiving gifts, meals and entertainment and never offer anything that would violate those rules and put the business partner in a potentially uncomfortable position.

We recognize there may be occasions when refusing to accept a gift would be considered insulting to the giver, particularly if you have been presented with a gift in front of a group. If you cannot decline the gift or circumstances preclude its return, immediately notify your local human resource team, who will work with you to donate, distribute, or raffle it among other employees. You must also share our company's rules regarding gifts with the giver to help prevent similar situations in the future.

When you offer or accept a gift, hospitality, entertainment, or travel, you must also make sure it is aligned with local regulation as they could be more stringent and restrictive. Depending on where you work, your local management team, in consultation with the company's Group office, may adopt more specific limits on what you may accept.

COMPANY ASSETS



Our company's assets must be used primarily and judiciously for legitimate business purposes only. These include tangible assets such as computers, laptops, equipment, systems, facilities, materials, labour and other resources as well as intangible assets such as our goodwill, intellectual property and relationship with customers, partners and suppliers. We must protect our assets from damage, loss, misuse and theft and must not use them for personal or other non-company purposes unless management approves in writing. Company's assets must never be used for anything illegal or unethical (such as access to, or dissemination of, pornographic or offensive subject matter.

Responsible, incidental personal use of company assets such as computers, laptops, mobile device and systems is acceptable, but it should be occasional in nature, outside of work hours whenever possible, must not detract from your responsibilities or productivity and must be used in compliance with relevant policies of the company. In protecting our IT equipment and assets, you must always follow our relevant IT and security policies, such as, the security requirements at your facility, restriction on sharing your company passwords, printing only when you really need to, making sure your laptop and other company devices are secure while traveling, and protecting company's intellectual property.



COMPANY ASSETS



Be aware that any information you create, share or download onto company systems belongs to the company, and the company reserve the right to monitor system use at any time, to the extent permitted by law.

Any suspected loss, carelessness, misuse or theft of the company's assets should be immediately brought to the notice of your manager and reported to concerned internal IT team.

Intellectual Property (IP) - Patents, copyrights, trademarks, trade secrets and other intellectual properties are also valuable company assets. Protect IP with a passion and remember that the company owns any work product (such as ideas, processes and inventions) that you develop or design in your work with us to the extent permitted by law. That ownership continues even if you leave our company.

While we protect our IP, we must also take care not to infringe others' IP, for example, using information copied from publicly available but copyrighted third party materials (like contents from websites and trade journals) unless legally permitted, or agreeing to provide transport or other services which you know involve transporting counterfeit goods or other materials infringing third party IP rights.



PROTECTING CONFIDENTIAL INFORMATION; INSIDER INFORMATION



Information is one of the most valuable business assets and helps us maintain our competitive advantage. We consider any non-public information about the company as well as confidential information about our customers, suppliers or other business partners that you may have (or access) by virtue of your employment, to be confidential information. It can be written, spoken or electronic. We are committed to safeguarding and protecting such confidential information. Confidential information about the company can include: business plans, marketing strategies and mergers and acquisitions; financial data such as pricing, costing, profit margin, business proposal and unpublished financial results; operational information such as plans for major management changes, employee data and unpublished customer list; and technical information such as proprietary technology, know-how and software program.

When handling information, you must:

- Take appropriate steps to understand the classification of the information and handling requirements as per the relevant policy or system for information classification used by the company.
- Use non-public information only for legitimate business need in connection with the purpose of your access, and not for any personal or other purpose, except as required by law.



PROTECTING CONFIDENTIAL INFORMATION; INSIDER INFORMATION



- Distribute or share non-public information only with those who have both the authorization to access it and a need to know the information in order to do their jobs.
- Take care not to disclose information in public places, including taking all necessary steps to protect information in documents and on IT devices when away from workplace.
- Immediately report events which could impact the security of confidential information including loss or unauthorised disclosure (including inadvertent or accidental disclosure to wrong recipient)

If you are not sure whether information can be shared or how to handle it, ask your manager, information security manager or legal team.

You must respect other people and companies' confidential information. Remember, your duty regarding non-public information lasts beyond your employment. For instance, you should not use or share a list of confidential list of potential business opportunities or customers from your former employer(s) or ask others to do so, and if you leave the company, do not share our confidential information with others.

Insider Information

In the course of your association with the company, you may have access to information regarding the company or its business, operations, customers, suppliers or business partners that may be considered as material, non-public information or unpublished price sensitive information or 'insider information' which an investor would consider relevant for deciding whether to buy or sell shares or other securities (usually when security is traded in a stock exchange).

We strictly prohibit trading securities on the basis of such information. You should never buy or sell any securities based on such information nor should you give someone else (e.g. friend, spouse or broker) a tip regarding such information, which not only breaks the trust with our investors and the public, but can also be illegal under the applicable securities law.

FINANCIAL REPORTING AND ACCOUNTING



Our accounting records are relied upon to produce reports and certificates for our management, stockholders, creditors, bankers and most importantly governmental agencies including tax authorities in multiple jurisdictions. The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and should accurately reflect the underlying business transactions.

The making of false or misleading entries relating to financial results is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and truly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. Towards this end, we require that:

- No entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- Transactions be supported by appropriate documentation;



FINANCIAL REPORTING AND ACCOUNTING



- Transactions with parties such as customers, suppliers, bankers, consultants, contractors, business partners or any other third parties are committed or executed only after the transaction has been duly approved by the requisite authority;
- The terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- Compliance with our system of internal controls be always ensured; and
- No cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

If you are an employee who collects, provides or analyses information or otherwise contribute in any way in preparing or verifying these reports, you should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the company that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances, and the quality and integrity of our accounting and disclosures. In addition:

- You may not take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, or other applicable laws, rules and regulations, including for all Group reporting requirements with Ind AS accounting standards;
- You must cooperate fully with the finance and accounting department, as well as our independent public accountants and counsel, respond to their questions with candour and provide them with complete and accurate information to help ensure that our books and records are accurate and complete, and ensure that all transactions that have a commercial substance or obligation are executed only after it has passed through the finance and accounting department; and
- You may not coerce, manipulate, mislead or fraudulently influence our finance and accounting department, our independent public accountants or counsel, if you know or should know that the action, if successful, could result in rendering our financial statements materially misleading.

EXTERNAL COMMUNICATION; SOCIAL MEDIA

External Communication: Communication with investment communities (including shareholders, brokers and analysts), the media and the public must be managed carefully. Such communication has important legal requirements and demands specialist skills and experience. Only individuals with specific authorisation and training/briefing may communicate about the company with investment communities, the media or the public, or respond to their enquiries or question.

If you are not specifically authorised by the company in this behalf, you must not:

- Communicate with investment communities, the media or the public, either on or off the record
 - Respond to enquiries from investment communities, the media or the public: all enquiries must be directed to the person authorized by the company
 - Get drawn into conversations, answer any questions or provide any information or opinion
 - Make any forward-looking financial statements or provide 'inside information'
- The above rules also apply outside formal work settings, such as at external speaking engagements, courses, seminars, trade association events or social occasions.



EXTERNAL COMMUNICATION; SOCIAL MEDIA

Social Media: Posting company related information on social media on behalf of the company is restricted to individuals authorized by the company. The company permits appropriate, responsible, business related use of social media to enhance our interactions and communications with customers, suppliers, industry colleagues, business leaders, and others.

However, wherever necessary, you must exercise good judgement to make it clear in your postings that you are a company employee, and your views are your own – you are not speaking for the company. This also applies when responding to the subject of our company that comes up while you are on social media.

Never disclose confidential information about the company, our customers, suppliers, other business partners or competitors, and never post anything that might constitute a threat, intimidation, harassment or bullying. If you want to establish a social media profile or account on behalf of the company or speak on behalf of the company on social media or use social media to conduct company's business, you should contact the Marketing or Communication team.



WORKING WITH CUSTOMERS AND THIRD PARTIES



We must conduct ourselves in a professional, fair and transparent manner in our dealings with our customers. We are committed to highest quality standards and we must work to continually improve our standards in striving to make our customers successful. Our customers rely on our knowledge of the global and local requirements and the markets that we operate in and we must include and prioritize customer focus in all our business dealings.

We strive to conduct business with suppliers, business partners and other third party stakeholders who share our commitment towards high standards of ethical and integrity and operate accordingly, with special regard to bribery and corruption, anti-competitive behaviour, labour standards, confidential information, conflict of interest, and health, safety and environment.

Therefore, we will try to ensure as far as possible that such third parties are substantially in compliance with the Code, keeping in mind that otherwise the company or you may suffer reputational damages and may be held legally accountable in the event of any such third party being involved in unethical or illegal activities while acting on behalf of or along with the company.



POLITICAL ACTIVITIES



The company is not a political organisation. It does not support political parties (including candidates or representatives of political parties) nor contributes to the funds of groups whose activities are calculated to promote party interests or the election of a specific candidate. We respect your right to individually participate in political processes and make voluntary contributions in relation to the same.

However, any such involvement must not be done in a manner to cause or use the resources of the company (including your time at work) nor should it be represented to appear as though your personal political views are endorsed by the company.

Employees who are concerned about whether their political activities are appropriate should contact a member of the human resource or legal teams. If you plan to seek or accept a public office, you must obtain prior written approval from the company.



FINAL MESSAGE



Be proud of always acting with Integrity! The company's reputation is built by dedicated, hardworking employees like you who do the right thing every day, in every act and every transaction.

Wherever we are located we operate as a team. We face our challenges, overcome obstacles, and celebrate successes together. Collaborating and supporting each other for the good of our customers, employees, communities, and shareholders is how we succeed.

AMENDMENTS

We are committed to continuously creating, reviewing and updating our policies. We therefore may amend the Code at any time.

Document History

| Effective Date | Version Number | Content Owner | Description |
|--------------------------------|----------------|---------------|--|
| 15 th October, 2021 | 1.0 | Legal & HR | New Global Code of Conduct for fostering a culture of high standards of business ethics and compliance across our business |

