

## **CODE OF CONDUCT FOR EMPLOYEES OF MORGAN VENTURES LIMITED**

### **Scope**

This Code of Conduct (herein referred to as “Code”) applies to all employees of Morgan Ventures Limited and its subsidiaries, if any (herein referred to as “Morgan Ventures Limited” or “the Company”) within all physical spaces across all operations of Morgan Ventures Limited and also applies when an individual is officially representing the Company in public spaces. This also includes the use of an official e-mail address or acting as an appointed representative at an online or offline event.

The Code of Conduct for Board of Directors and Members of Senior Management of the Company are covered under a separate policy- ‘Code of Conduct for Board and Senior Management’.

### **Objective and Applicability**

The objective of this Code is to define minimum acceptable conduct and ethical behaviour expected from employees, in alignment with the Company’s core values.

### **Code of Conduct**

#### **1. Honest and Ethical Conduct**

- a. Employees shall endeavor to respect and adhere to basic human relations for the smooth operations of the Company and shall always strive to uphold these qualities while guiding and leading their team members based on these values.
- b. Employees shall work as a cohesive team and strive to attain excellence in their work assignments, adhering to the principles of self-discipline, objectivity, commitment and integrity.
- c. Employees should apply due diligence while dealing with the money, assets, or property belonging to the Company.
- d. Employees shall follow data classification and data protection guidelines.
- e. Employees shall undertake the safe custody of records, documents, designs, or any other proprietary information and shall not pass on, reveal, take copies or carry the same outside Company premises without permission.
- f. Employees shall deal with the external stakeholders with utmost courtesy and respect.
- g. Employees shall take due care for upholding the reputation and goodwill of the Company.
- h. Employees shall dedicate themselves towards the attainment of Corporate Vision and Mission.
- i. Employees must always uphold the organization’s values and culture.

j. Employees are to abstain from engaging in any activities including those involving moral turpitude, that compromise the interests, reputation, or goals of the organization.

k. Employees shall desist from carrying on or engaging in any other work, business, or occupation without prior permission from the Company Employees must strive to continuously invest in their individual self-learning and development.

## **2. Anti-corruption and Anti- bribery**

a. Employees shall ensure that they abide by the Company's 'Gifts and Hospitality policy', while conducting business

b. Employees shall report any unethical activity through the Whistleblower mechanism.

## **3. Anti-discrimination**

a. Employees shall act in adherence to Morgan Ventures Limited Equal Opportunity and Anti-discrimination policy Confidentiality of information

b. Employees are bound to maintain confidentiality of the Company information including but not limited to personal data and data related to customers, suppliers, or business associates, except when authorized or legally mandated.

c. Use of confidential information for his/her own advantage or profit is strictly prohibited.

d. Employees should only collect data that is adequate and relevant and use it solely for the purpose for which it is collected.

## **4. Avoid conflict of interest**

a. Conflict of interest refers to any personal, professional, financial, or other similar types of interests which adversely impact the ability of employees to make sound and independent business decisions on behalf of the Company. Employees shall avoid conflict of interest situations.

b. In case of a likelihood of a conflict of interest, the employee shall make full disclosure of all the facts and circumstances and take approval from HR and respective Head of Departments

## **5. Anti-trust/anti-competitive practices**

Employees are required to comply with all applicable laws of the land. Employees shall not engage in any activity which constitutes an anti-competitive behaviour Anti-money laundering and anti-corruption Employees shall comply with all applicable anti-money laundering and anti-corruption laws Any violation of such laws observed by an employee should be disclosed via the Whistleblower mechanism Environment, health and safety Morgan Ventures Limited is committed to the thoughtful design and manufacturing of products in an environmentally sound and responsible manner while ensuring the health and safety of all our stakeholders. All employees should refer and adhere to Company Environmental, Occupational Health And Safety Policy and adopt sustainable practices.

## **6. Prohibition of Harassment**

The Company has zero tolerance for harassment. Harassment refers to any unwelcome conduct (verbal, nonverbal or physical) that has the purpose or effect of violating a person's dignity, creating a hostile or offensive environment, or can reasonably be expected to cause an individual to feel uncomfortable, intimidated, threatened, bullied, humiliated, offended, denigrated or distressed.

## **7. Whistleblowing**

The Company has a robust Whistleblower mechanism. Refer to the Whistleblower policy available on the Company Whistleblower Policy. Employees are encouraged to use guidance provided by this policy for reporting actual or potential breach of this Code. Administration of the code Every employee has an obligation to comply with this Code and applicable laws. The Company shall provide training to the employees on this Code as a part of the onboarding process and annual refresher programme.