

DCM Shriram Limited

Code of Conduct for Employees

Contents

Foreword.....	2
Our Vision and Our Values.....	3
Scope:.....	4
Principles.....	4
Compliance with Laws & Policies.....	4
Standard of Conduct & Behaviour	4
Equal opportunity employer	4
Human rights.....	4
Anti-Bribery and Anti-Corruption	4
Competition and Anti-Trust	4
Marketing and Advertising.....	5
Gifts and hospitality	5
Freedom of association.....	5
Confidentiality & Secrecy.....	6
Insider trading.....	6
Prohibited drugs and substances.....	6
Conflicts of interest.....	6
Public Communication	6
Environment	7
Health & Safety	7
Dress Code.....	7
Prevention of Sexual Harassment.....	7
Employee Training	7
Helpline & Contacts.....	8
Grievance Redressal Mechanism (Ombudsman).....	8

Foreword

DCM Shriram Limited is committed to providing a working environment free from any kind of discrimination and harassment. We respect the dignity of everyone involved at our workspace. With a broader scope, company's commitment towards ethical business practices not just covers the human capital i.e. employees but also the community as well. The company has the agenda of learning, development and inclusion among the human capital at the fore front. All of this could only be achieved because of the strong governance framework in place which is based on the pillars of integrity, accountability and transparency.

DCM Shriram Limited Code of Conduct is our guide of doing things with utmost care following ethical and equitable principles. Professionalism at the workplace means building an environment that promotes fairness and equality among colleagues, regardless of differences.

The Company has introduced WIDE (We are Inclusive, Diverse and Equitable) initiative that aims to increase inclusivity, diversity and equity across our organization. This is achieved through unbiased recruitment, retaining employees with a positive environment, helping diversity rise, and reinforcing messages of inclusiveness.

Our Code of Conduct is reflection of Our Values that is at the core of our business. The principles of Code of Conduct define how we engage with our stakeholders including employees. We expect all the employees to follow the principles while conducting business to keep our stellar reputation at paramount.



(Sandeep Girotra)
Executive Director & CHRO

Our Vision and Our Values

I **NTEGRITY**

Uphold ethical standards.
Be socially responsible. Deliver on promises.

A **GILITY**

Act with speed.
Adapt continuously. Deliver results.

C **USTOMER-CENTRICITY**

Listen to customers.
Build long lasting relationships.

T **EAM WORK**

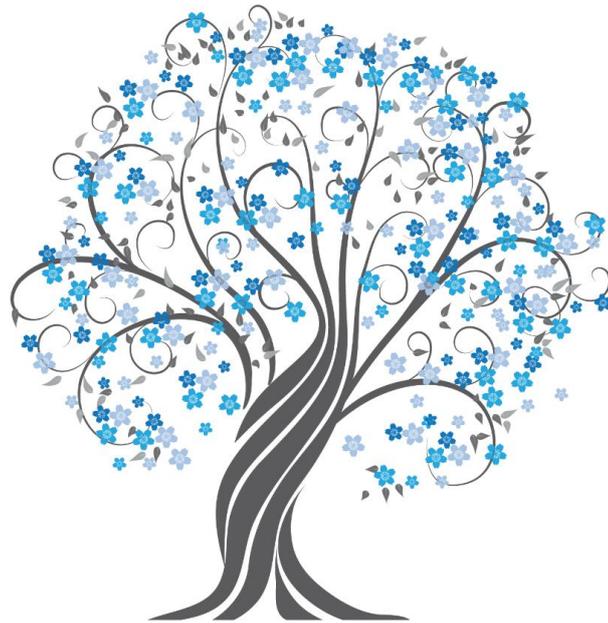
Foster collaborative working.
Promote meritocracy.
Practice empathy & humility.

O **PENNESS**

Encourage diverse views.
Build external orientation

N **EWNESS**

Be innovative.
Be Creative.



For more details please refer to website link <https://www.dcmshriram.com/our-values>

Scope

All employees of DCM Shriram Limited should comply with Code of Conduct principles as mentioned below. This Code sets out our expectations of all those who work with us. We also expect those who deal with us to be aware that this Code underpins everything we do, and in order to work with us they need to act in a manner consistent with it.

Principles

Compliance with Laws & Policies

- Adhere to all applicable laws, rules and regulations both in letter and spirit.
- Be aware of the regulatory framework in our respective domains

Standard of Conduct & Behaviour

- Conduct ourselves in a discipline manner, conforming to highest standards of etiquettes, decorum and decency
- Practice complete transparency and openness in all kinds of communication without any politics

Equal opportunity employer

- Provide equal opportunity to all employees and all eligible applicants of employment based on work related decisions on merit and qualifications - not on race, color, national origin, religion, caste, gender, age, sexual orientation, gender identity or expression, marital status, medical condition, disability, or any other characteristics or status that is legally protected.
- Maintain every relationship with due respect and dignity

Human rights

- We are committed to upholding human rights of our employees, communities, and everyone impacted by our operations wherever we do business (including our factories, contractors, customers, suppliers and vendors) in alignment with principles contained in internationally recognised frameworks. For further details on our commitments please go through the Human Rights Policy (<https://www.dcmshriram.com/docs/files/Human%20Rights%20Policy.pdf>)

Anti-Bribery and Anti-Corruption

- Our employees and those representing us, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business

Competition and Anti-Trust

- Engagement in activities like but not limited to any form of agreement or understanding with competitors to fix prices, rig bids, sharing of company data or information, or copying the same on personal device or email or storage media,

allocate customers and/or restrict supply is completely unacceptable and will invoke extremely severe disciplinary measures and actions.

- Never become involved in money laundering

Marketing and Advertising

- The Company believes in promoting its business by communicating accurately and honestly. We ensure that our products and services are marketed in a fair, honest and ethical manner. We market our products and services on their own merits and not make unfair or misleading statements about the products and services of our competitors. Our concerned employees must ensure:
 - Responsible advertising practices and compliance with all applicable laws.
 - They must make sure that the any claims made about the product and services are true, have been adequately substantiated and accurately states price.
 - Product attributes accurately represents information about the quality and features.
 - They must ensure that all information conveyed to the public, regulatory authority and others is accurate, complete and consistent.

Gifts and hospitality

- Do not offer or accept bribes, kickbacks or any other kind of improper payment including facilitation payments.
- We discourage receipt of any type of gifts by directors, officers, employees from its external stakeholders (such as customers, agents and other third party representatives). Receipt of reasonable and customary edible gifts (such as sweets / dry fruits) during festivals shall be reported to the Head of Admin & HR and shall be distributed amongst the employees. Apart from receipt of such gifts, no other gifts are acceptable by any persons mentioned above.

In some exceptions, where gifts and entertainment is required to conduct business, one should manage it with the prior consent of the Management and also with full disclosure to the concerned Head of Department.

Freedom of association

- We recognise that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.

Confidentiality & Secrecy

- Treat all company data and information with utmost confidentiality and secrecy at all times even after cessation of employment

Insider trading

- Any non-public information, which might influence the market price of the Company's securities, should be kept in strict confidence until publicly released by authorized persons in accordance with applicable stock exchange regulations. Any employee or officer who has access to any non-public information, which could influence the price of Company's securities, must keep such information confidential and refrain from carrying out any transaction in such securities; whether for her/his own account or for the account of a third person. To use non-public information for personal financial benefit or to influence others who might make an investment decision on the basis of this information is not only contrary to the Company's rules of conduct but also illegal under SEBI Insider Trading Regulations. . For further details on our insider trading code, please go through the below link

https://performancemanager10.successfactors.com/sf/start?_s.crb=jtannriUr10TQn_gxHt2SCnl0nycXJUoJFZo7Loa2WLc%253d

Prohibited drugs and substances

- Employees are not allowed to smoke, consume oral tobacco products, alcohol or any kind of narcotic drugs during working hours in the premises of the organization
- Employees are strictly prohibited from the unlawful use, possession, solicitation for, distribution of, or sale of narcotics or other illegal drugs.

Conflicts of interest

- Do not engage in any business relationship or activity which might detrimentally conflict with the interests of the company
- Do not engage in any kind of insider trading by virtue of our access to company information and its working
- Take prior permission before taking any membership of professional or other bodies, associations, institutions etc.
- Taking employment, accepting a position of responsibility or running a business outside present employment, with or without remuneration, must not be with any customer, supplier, distributor or competitor of our company as it could create conflicts of interest. Any such activity undertaken must notify and seek prior approval in accordance with applicable company policies and law.

Public Communication

- Any kind of relationship or communication in public (including social medias) print or electronic to be done only by persons so authorised for the purpose
- External presentations can be an excellent way to share our expertise with others, but make sure you have the required approvals before accepting any invitation and obtain the necessary approvals on content

Environment

- Prevent the wasteful use of natural resources and are committed to improving the environment, particularly with regard to the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials.
- For more details on our commitment to Environment Protection please visit EHS Policy (https://www.dcmshriram.com/docs/files/AW_EHS%20Policy_A4%20Size.pdf)

Health & Safety

- Protect and safeguard all company assets and equipment from any misuse / damage. Safety standards and regulations to be adhered strictly.
- Conduct operations with the highest regard for the safety and health of employees and the protection of the general public
- For more details on our commitment to Health & Safety please visit EHS Policy (https://www.dcmshriram.com/docs/files/AW_EHS%20Policy_A4%20Size.pdf)

Dress Code

- Each one of us is a brand ambassador of the Company and is judged by the way the world at large views us. Therefore, it is imperative that we are well turned out at all times. The attire we wear reflects our appearance, confidence and the impression we create. The same enhances the reputation of the company. We are expected to dress in a professional manner befitting Company and our image. Please refer to the business dress code policy for more specific details.

Prevention of Sexual Harassment

- Maintain a work environment free from any kind of harassment
- Refrain from committing any acts of sexual harassment at workplace
- For more details on Prevention of Sexual Harassment please visit POSH Policy https://dcmshriram.com/business-unit/Employee_Handbook.html
- Formation of Internal Committee: Pl refer the link below- https://dcmshriram.com/business-unit/Internal_Compliants_Committee.jpg.html

Employee Training

- All employee will undergo mandatory code of conduct training every year facilitated by HR team, to provide necessary information on revised policy, FAQs and other additional references that need to be considered as a part of Code of Conduct policy.

Helpline and Contacts

- For any query, clarification & detailing on related policies, the following people or concerned corporate function may be contacted:-

S.N.	Policy	Name of Contact Person	Designation	Contact No	Mail ID
1	Policies on People, Process & System	Mr Sandeep Girotra	ED & CHRO	9811733306	sandeepgirotra@dcmshriram.com
2	Policies on EHS	Mr KK Sharma	WTD	9968660606	kksharma@dcmshriram.com
3	Policies on Insider Trading Code	Mr Sameet Gambhir	Company Secretary	9810478607	sameetgambhir@dcmshriram.com

Grievance Redressal Mechanism (ombudsman)

- The Code of Conduct is guiding principles for employees on how to conduct the behaviour while engaging with other employees, customers, suppliers and other stakeholders. Any behaviour leading to violation of the principles may lead to action according to the employment terms and relevant company policies.
- All the grievances will be handled through the Vigil Mechanism which is available on Company's Website
(<https://www.dcmshriram.com/docs/files/Vigil%20Mechanism%20Policy.pdf>)