OUR CODE HIGHLIGHTS

GROUND RULES

- 1. Strictly follow the Code of Conduct
- 2. Comply with law in letter and spirit
- 3. When in doubt Ask
- 4. Report all likely violations



	• ALWAYS (play by rules)	N
CONFLICT OF INTEREST	 Disclose every conflict of interest situation Take prior approvals where conflicts could arise 	• • (• (•) i • -
BUSINESS CONDUCT	 Follow Product and Service quality norms Make correct statements about our products and services Treat customers ethically and fairly 	•••
RECORDS & COMMUNICATION	 Maintain accurate books and records Co-operate fully in audits & investigations Strictly follow insider trading prevention laws 	• •
WORKPLACE CONDUCT	 Be humble, courteous and professional Be fair and equitable in decisions Respect free speech and make a safe and humane workplace Report any kind of harassment or bullying 	• • • • • •
COMPANY ASSETS & INFORMATION	 Protect Company assets and information Report any actual or potential cyber incident Promptly report loss or theft or destruction of personal or Confidential Information 	

NEVER (play foul)

Offer or accept gifts from stakeholders

Mahindra

Rise.

- Offer or accept bribes
- Engage in any other vocation while in employment
- Take up directorships in external companies
- Accept favours from stakeholders
- Invest in stakeholder's businesses
- Contribute to or engage in political activities
- Adopt unfair or deceptive trade practice

• Disclose non-public information to others

- Communicate for Company
 without authorisation
- Post Company information on social media
- Indulge in harassment of any form
- Be under the influence of alcohol or other substance at workplace
- Discriminate on the ground of age, sex, race, colour, nationality, sexual orientation, disability status
- Disclose Company information or Personally Identifiable Information without authorisation
- Infringe intellectual property rights
 of others
- Use unlicenced software on Company devices

*Please refer The Code of Conduct for details.

In case of any guidance on code or policies, employees are encouraged to reach out to ethics@mahindra.com