



Code of Conduct: Annexure A

Integrity in Personal Conduct:

- All employees shall abide by the laws of the land in whichever country we operate in.
- All employees shall transact with others (including each other) in a fair and dignified manner, including being diversity sensitive.
- Each employee shall be responsible to the best of his/ her knowledge, for fair representation and accuracy of information in the documents prepared or signed off by him / her.
- Each employee shall ensure that his/ her personal information provided to the organization is factual and accurate including prior work experience, educational qualification, compensation details, etc.
- Each employee shall be responsible to ensure that official expenses and personal claims e.g. Travel expenses, Medical, LTA, HRA, Vehicle running expenses, etc shall be factual, correct and within the organization rules.
- No employee shall use organization time and resources for personal gain. e.g. internet surfing, share trading, use of infrastructure.
- No employee shall receive any gift, consideration or favour in cash or kind for self (or any family members or relatives) from business partners or anyone with whom he/she has dealings on behalf of the Group.

Employees are also expected not to receive “expensive gifts” from business partners at the time of social functions or occasions such as their children’s wedding or their own personal anniversaries. However, small business gifts such as pen stands, leather items carrying logo of the gifting organization, sweets, dry fruits, chocolates at the time of Christmas, Diwali, New Year, etc are exempt from this provision. The essential determinant here being: the size and cost of favour received and the obligation that it creates which puts our actions and decisions subsequently in a questionable light.

Conduct at Work:

- All employees shall take decisions in the best interest of the Aditya Birla Group/ business.
- All employees shall adhere to Group/ business policies, processes, systems and regulations in letter and spirit.
- All employees shall secure the physical, financial and intellectual property/ assets, interests of the organization by observing the discipline of internal controls.
- Each employee shall highlight deviations to his/her manager from stated Organization process and policy by an individual or a team.
- All employees shall ensure safe and secure working environment for themselves and others by observing discipline on internal guidelines.
- Each employee shall support the team / larger organization by sharing knowledge, information and resources available with him/her or within his/her area of influence.
- Each employee, who comes across or handles confidential data about the organization, business and personnel working within the organization, must maintain confidentiality of information (e.g. acquisition plan, personal details, health record, family, performance, etc) and share the same only with authorized personnel for legitimate purposes.
- Each Manager shall take and communicate people related decisions fairly, objectively and only on need to know basis.
- Each employee shall promote cooperative and professional relationship of his/her team with other functions and businesses within the Aditya Birla Group to promote its larger intent.
- No employee shall indulge in bribery and corruption i.e. not seek, accept or receive, directly or indirectly, any gift, payments or favour in whatsoever form from Company's business associates, to secure illegitimate gain for the organization or which can be perceived as being given to gain favour.

Grasim Industries Limited

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- All employees shall respect and protect the confidential information and intellectual property of the partners and other companies that are provided to us under agreement for specific use and shall pay appropriately for technology / software usage.
- Each employee shall take prompt action/ decision on any complaint that is received regarding a Value departure/ Violation or Code of Conduct.
- All employees shall report unethical business practices or any incidents of non-adherence to the Code of Conduct as per the procedure laid in Grasim's Whistle Blower Policy and all such complaints shall be addressed as per the Guidelines in the Whistle Blower Policy.
- All employees shall be provided equal opportunities and shall treat all employees with respect and dignity in their place of work and provide them with a working environment, free of discrimination that promotes inclusion and diversity.

Conflict of Interest:

- Each employee shall ensure that all people related decisions including hiring, allocation of job responsibilities, performance rating, promotion, etc. are free from bias and personal interest.
- Each employee shall ensure that if there is a perceived conflict of interest in a transaction, e.g. the vendor is "personally known" to individual, he/ she shall inform his/her interest to the team/ individual concerned and his/her manager and refrain from being part of the decision making process.
- No employee shall indulge in any action that may be construed as conflict of interest. e.g. Insider trading, Moonlighting, Personal investment in Business Partners/ Competition, etc
- Each employee shall ensure that all policies of ABG dealing with conflict of interest are adhered to. E.g. Employment of Near relations, Business dealing with friends and relatives, reemployment of Ex-employees, etc.

Interface with the External World:

- All employees shall ensure that their interactions and transactions with customers and partners are transparent, professional and leave a positive image of the Aditya Birla Group and its businesses.
- All employees shall ensure that commitments that are legitimately made are honored.
- No employee shall encourage our business partners to indulge in unfair trade practices with their customers.
- Each employee shall respect free market and fair competition, and shall not seek to violate anti-trust and competition laws.
- No employee shall deride or criticize the Aditya Birla Group, its businesses and policies at any public forum. Any such criticism shall be voiced within the organization.
- Only official spokespersons shall represent the Group with the Media. In case, the media attempt to talk to any employee either formally or informally regarding the Group, and its businesses, the same should be redirected to the official spokespersons.
- Any disclosure of organization information informally to the media shall constitute violation of Code of Conduct.
- All employees shall ensure that their personal conduct in a public place and with public is dignified and reflective of Group Values.
- All employees shall bring to attention, in case they notice infringement of intellectual property of the Group such as misuse of logo, misrepresentation of product, malicious propaganda, etc.

All employees are encouraged to bring to attention of management i.e. their seniors/ other senior representatives of the Group when they come across a violation of Code of Conduct.

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