



CODE OF CONDUCT

Foreword

As a Company, Swiggy is famous for what it does – delivering unparalleled convenience to millions of Indian doorsteps every day. But what we do, relies heavily on who we are and what we believe in. These principles of who we are, what we believe in and how we act is the bedrock of our value system and come a long way in shaping Swiggy’s growth and the development of Swiggsters. These value principles form our ethos and culture, remaining a true constant in a world where everything changes at a rapid pace.

Our CEO and co-founder Sriharsha Majety, shares his insights on why and how our values define us. “We knew we needed to create a place where I and every Swiggster could come in and do the best work of our lives, with a guiding force so powerful that it drowns out all the distractions. Our values are, at the end of the day, the fabric that holds us together, that creates the identity and culture for the company we are. We don’t just state our values, we live by them”.

The Swiggy Code of Conduct is based on our value system and aims to guide and govern the conduct of our company as well as our colleagues in all matters relating to business. It outlines our commitment to each of our stakeholders, including the communities in which we operate, and is our guiding light when we are sometimes faced with business dilemmas that leave us at ethical crossroads.

Our success so far has been defined by our commitment and adherence to Swiggy values, principles and the code outlined. I trust every Swiggster will not only adhere to this Code in form and in substance but will continue to set new standards of ethical conduct that will generate deep respect and inspire emulation by others.

Let us lead by example and create a legacy that outlives us!

Table of Contents

- A. Purpose
- B. Applicability
- C. Our Responsibility
- D. Ethics in our Business activities
- E. Protecting our information and assets
- F. Fair Practices at work
- G. Compliance with Laws and Regulations
- H. External communication
- I. Administering the Code of Conduct
- J. Glossary of terms

A. Purpose

This Code sets out how “We” interact with:

- our employees, or those who work with us;
- our customers; partners including delivery partners, merchant partners and brand partners
- the communities and the environment in which we operate;
- our value-chain partners, including suppliers and service providers, contractors, channel partners, consultants, intermediaries and agents;
- Any other stakeholders;

It also 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.

B. Applicability

This Code shall apply equally to employees (referred to as “**You**” hereinafter) at Swiggy (collectively referred to as ‘**Swiggy**’ or ‘the ‘**Company**’ or ‘**We**’ throughout this Code).

- a. “Employee(s)” means every full-time or part-time Employee (whether regular, fixed-term or temporary) including all directors and officers of the Company. This policy is also applicable to all employees including trainees, management trainees, apprentices, interns, on-roll and off-roll employees of the Company.
- b. “Company” or “Swiggy” means Swiggy Limited including its subsidiaries and affiliates

C. Our Responsibilities

Follow the Code

Our Code applies equally to all Swiggy employees including directors and officers of the Company across subsidiaries. It also applies to our partners, suppliers, agents or others acting on the Company’s behalf. As employees, it is important that we know and follow the Code as a guideline for decision-making that is paired with integrity.

We must read the Code and refer to it whenever in doubt or faced with a dilemma . All employees shall, upon joining and on an annual basis, confirm in writing or any other manner as defined by the Company, that they have read the Code, and understand and agree to adhere to it during the tenure of their relationship with the Company and thereafter, to the extent it pertains to Swiggy.

Lead by Example

No matter what our role is, each one of us is expected to lead when it is a question of ethics and be accountable for our actions. We act with responsibility and integrity in line with Swiggy Values.

Be an Example for our teams

Most often, a manager is the first person to be contacted about a concern in our work environment. Managers have some specific responsibilities:

1. Demonstrate Ethical leadership - Be a role model of ethical behavior.
2. Encourage your team to raise issues and speak up.

3. Communicate a positive message about your commitment to ethics and compliance.
4. Promote our values, the Code of Conduct and compliance with policies and the law.
5. Actively support ethics and compliance awareness and training programs.
6. Have open avenues for communication.
7. Listen and respond fairly to employee concerns.
8. Find satisfactory and complete resolutions to ethical issues.
9. Resolute total cooperation during internal reviews, audits and investigations
10. Escalate concerns when additional assistance is needed.
11. Never retaliate or tolerate retaliation against any individual for making a report in good faith. “Good faith” means having a reasonable belief that the information you have provided is truthful. It does not mean having ‘all the evidence’ about the potential violation or the matter reported
12. Never ask or pressure anyone to do something that is in violation of the Code.
13. If you supervise third parties, ensure they understand their ethics and compliance.
14. Make reasonable accommodations for individuals with disabilities in line with Swiggy policies and legal requirements, ensuring equal opportunities for all employees and other parties.
15. Be aware of the limits of your authority and do not take any action that exceeds those limits Delegate authority only when permissible and never delegate any authority to any individual who you believe may engage in unlawful conduct or unethical activities

Remember...

As Swiggsters, we are expected to adhere to the values and principles set out in this Code. By doing so, we strengthen our unique culture and identity.

D. Ethics in our Business activities

1. Dealing with Third Parties (Supplier of Goods and Services)

Third Parties are integral to Swiggy's operations, providing essential goods and services that contribute significantly to our success. Recognizing their vital role fosters strong partnerships and ensures mutual benefit.

We place equal emphasis on ethical conduct alongside commercial considerations when selecting third parties. Transparency and fairness guide the process, ensuring that suppliers align with our ethical standards and values.

We must prioritize Swiggy's interests and disclose any conflicts of interest on the HRMS portal, in line with guidelines laid out in our conflict of interest policy, while dealing with Third parties. Upholding impartiality in decision-making strengthens trust in supplier relationships, promoting a culture of fairness and transparency.

While interacting with third parties we must :

- a. Ensure that Third parties understand and agree to adhere with Swiggy's Supplier Code of Conduct
- b. Be vigilant and watch out for any signs of our business partners violating applicable laws and regulations, including local employment , anti-corruption, environmental, health and safety laws
- c. Each one of us working with suppliers, must make decisions in the best interest of Swiggy and on performance criteria, and not for any personal benefit or gain.
- d. Clearly communicate Swiggy's ethical standards, including anti-corruption measures and human rights principles, to third parties to align their behavior with Swiggy's values.
- e. Cooperate with audits of suppliers and stop purchasing from those not making real progress in meeting our standards
- f. Respect the confidentiality of third parties' information and protect it from unauthorized access or disclosure.
- g. Maintain clear and comprehensive documentation of all third party relationships, including contracts and correspondence.
- h. Remain vigilant and promptly report any potential or actual unethical conduct or non-compliance on the Whistleblowing hotline.

Remember...

“You” must ensure that suppliers have received a copy of the supplier code of conduct and “We” must make decisions in the best interest of Swiggy and not for any personal benefit or gain.

2. Avoiding Conflicts of Interest

A conflict of interest may exist if our personal interests, activities, or relationships make it hard, in real or the appearance of it, to perform our duties for Swiggy objectively and effectively. Even the appearance of a conflict of interest may damage Swiggy's reputation. When making business

decisions, we must avoid real or apparent conflicts of interest.

Further, we have a responsibility to make sure our personal financial activities do not conflict with our responsibilities towards the Company. A financial conflict of interest can arise when our judgment could be influenced, or might appear as being influenced, by the possibility of personal financial gain.

A conflict could arise when:

- a. **You** or **Your relative** have a financial interest in any business, non-profit, or an entity that does business with Swiggy.
- b. **You** or **Your relative** acquire a significant ownership interest (more than 1%) in any competitor
- c. **You** or **Your relative** perform work (as an Employee, officer, director) for any competitor or third-party doing business with Swiggy.
- d. **You** or **Your relative** works, or serves as an officer, director or advisor, for a non-profit or political organization with interests that intersect with Swiggy's businesses or with our position on a public policy.
- e. **You** benefit personally from opportunities or resources that they may have access to by virtue of employment or work at Swiggy.
- f. **You** work for or manage (directly or indirectly) a relative or is involved in or influences the hiring of a relative for employment at Swiggy or a third party associated with Swiggy.
- g. **You** take up any employment outside of Swiggy, whether commercial or non-profit, without seeking prior approval from our immediate Reporting Manager in writing and make adequate disclosures as guided in the [moonlighting policy](#).

Should any actual or potential conflicts of interest arise, ask yourself:

1. Would this create or appear to create an unfair incentive for me or my friends and family?
2. Am I putting Swiggy at risk of violating laws or agreements with our customers?
3. Would this look bad if it was brought up on social media?
4. Would this distract me from doing my job?

Reporting a conflict of interest

All such situations must be disclosed by reporting on the HRMS portal. Remember, having a conflict of interest is a violation of this Code. Additionally, you must also update any changes to your disclosures on the same. If a proposed transaction or situation raises any questions or doubts, "You" should raise it to conflicts@swiggy.in. We shall revert to **You** within a reasonable time, so as to enable "You" to take necessary action or safeguards to resolve or avoid the conflict, in an expeditious manner.

For new appointments, in case an instance of conflict of interest exists due to historical reasons, adequate and full disclosure by interested employees shall be made at the time of appointment in our company. Such employees shall make full disclosure to the relevant authority, of any interest leading to an actual or potential conflict that such persons or their relatives (including parents, siblings, spouse, partner, children) or persons with whom they enjoy close personal relationships, may have in a family business or a company or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with, our company.

Remember...

A conflict of interest could be any known activity, transaction, relationship or service engaged in by an employee, his/her immediate family (including parents, siblings, spouse, partner, and children), relatives or a close personal relationship, which may cause concern (based upon an objective determination) that the employee could not or might not be able to fairly perform

his/her duties for the company.

Disclose conflicts

1. At the time of joining
2. In the course of employment, as and when they arise

Please refer to our [Policy on Conflict of Interest](#) for more details

All Senior Management Personnel of the Company shall be governed by the Code to address conflicts for Senior management personnel that shall be made available to them.

3. Bribery and Corruption

Swiggy upholds its commitment to conducting business with integrity, devoid of corruption and bribery and comply with Anti-Bribery and Anti-Corruption laws as applicable to us. It is imperative for us to exercise caution and refrain from any involvement, perceived or actual, in offering or accepting improper payments, bribes, or kickbacks.

Furthermore, ensuring oversight and control over third parties acting on our behalf is essential. We must conduct thorough due diligence to verify their reputation, background, and capabilities, aligning with our ethical standards. Third Parties are expected to abide by the principles outlined in our Supplier Code of Conduct. We emphasize the importance of never engaging in actions through third parties that would contravene our ethical standards or be deemed unacceptable if undertaken directly.

You must adhere with the following key directives:

- a. Swiggy strictly prohibits offering, providing, or authorizing bribes or kickbacks under any circumstances for the purpose of obtaining or retaining business or for obtaining any favorable action.
- b. Conduct due diligence and thoroughly understand our third parties (including suppliers, consultants, agents), and all entities through which we conduct business. This includes knowledge of their activities, locations, infrastructure and their business credentials. Special attention must be given to those engaging with government departments and agencies.
- c. Any payments intended to improperly influence a government official are strictly prohibited. Payments made to expedite routine government actions, unless permissible under relevant legislation, are also considered improper.
- d. Swiggy does not make contributions to any political party, and employees are prohibited from making political contributions on behalf of Swiggy, whether in cash or otherwise.
- e. Gifts or business courtesies that may create an appearance of impropriety or damage Swiggy's reputation are strictly prohibited. Necessary approvals must be obtained before giving or receiving such items.
- f. Prior approval is required before engaging in any discussions related to potential employment or business opportunities with current or former government employees.
- g. Swiggy prohibits the maintenance of "off-book" accounts to conceal improper payments. All expenditures and payments must be accurately recorded in Swiggy's books and records.

While we must put forth our efforts in every transaction, we will not penalize for delayed performance of a transaction solely on the grounds of refusal to pay bribes.

Please refer to our ABAC [Policy](#) for more details

Remember ...

Violation by even a single employee of any law relating to anti-bribery, anti-corruption, anti-competition, data privacy, etc. could result in severe financial penalties and cause irreparable reputational damage to the company.

Q&A**How do I know if a transaction is indicative of a bribe and corrupt payment?**

While you should exercise adequate diligence, below are some bribery and corruption red-flags that you should watch-out for:

1. Requests for donation, gift, entertainment or business courtesy that is unusual.
2. Requests for payments which are unusual or not in the ordinary course of business
3. Special perks or privileges which have monetary effect and are perceived as illegal under any local law or regulation
4. Personal ties between an agent or third party and a government official or any agent or third party whose past history indicates unlawful behavior
5. Requests for arrangement(s) to be made without written records
6. Requests for provision of services to government officials which are not allowed as per applicable laws and regulations
7. Any monetary transaction that does not have documentary evidence.

4. Gifts, Hospitality and Entertainment**a. Giving and receiving gifts**

We must ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest.

Our conduct must reflect our ongoing commitment to doing business with integrity. Hospitality can play a positive role in building relationships with our Third Party(ies). Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. customary gifts during festive season. As accepting or receiving gifts and hospitality can generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of Swiggy's business activities.

We must decline gifts of any value from current or potential Third Party(ies) or customers as it would create the appearance of a conflict of interest. Customary gifts on occasions or festivals may be accepted if accepting such gifts is unlikely to impact your ability to take unbiased decisions with respect to such parties. Never request gifts, meals, entertainment or favors from current or potential Third Party(ies) – doing so is a violation of our Code.

We shall ensure that any gifts or hospitality received from, or given to, our suppliers or service providers comply with our company's gifts and hospitality policy.

Always remember that we may accept gifts or hospitality only if such a gift:

- a. Is modest in value and would not create a perception (or an implied obligation) that the giver is entitled to preferential treatment of any kind;
- b. Does not influence, or appear to influence, our ability to act in the best interest of our company
- c. Would not embarrass our company or the giver if disclosed publicly.

The following gifts are never appropriate and should never be given or accepted:

- a. gifts of cash or gold or other precious metals, gems or stones
- b. gifts that are prohibited under applicable law
- c. gifts in the nature of a bribe, payoff or kickback
- d. gifts that are prohibited by the gift giver's or recipient's Company
- e. gifts in the form of services or other non-cash benefits (e.g. a promise of employment).

b. Business hospitality, entertainment, travel and meals

We recognize that sharing meals and entertainment is common in business, so we may offer or accept occasional meals or entertainment offered in conjunction with meetings to discuss business with such third parties.

Lavish, expensive, or exclusive meals and entertainment are not acceptable because they may be perceived by others as a bribe or an attempt to influence business decisions. The thresholds would be as prescribed by the Company and may be amended from time to time.

Any hospitality or entertainment expense incurred toward third-parties must not exceed the "Normal and Appropriate value" threshold as defined in the Anti Bribery and Anti-Corruption policy. In the event, we anticipate that such thresholds are not adequate, a prior authorization from the reporting manager should be sought in line with guidelines laid in the Anti Bribery and Anti-Corruption policy.

We also recommend, if a meal or hospitality has to be offered to a Third Party(ies) or while going out for business related lunch, the senior most Employee must pay the bill to ensure transparency in approval process.

All reimbursement requests for legitimate expenses must be submitted within 90 days from the day of expense. Any delay in submitting the reimbursement request may result in claim rejection.

5. Maintenance of Accurate Records, disclosures and audit

The integrity of our financial transactions and records is critical to the operation of our business. Our stakeholders trust is based on their confidence in the accurate recording of our financial transactions. Additionally, as a Company, we are bound by regulations to ensure certain standards for accurate financial reporting and we are required to have appropriate internal controls and procedures. If you have responsibility for or any involvement in financial reporting or accounting, you should have an appropriate understanding of, and you should seek in good faith to adhere to, relevant accounting and financial reporting principles, standards, laws, rules and regulations and the company's financial and accounting policies, controls and procedures.

Additionally you should take every precaution, whether you are otherwise required to be familiar with

finance or accounting matters or not, to ensure that every business record or report with which you deal is honestly filled in, accurate, complete and reliable.

Our employees shall not make any wilful omissions or misrepresentation that would compromise the integrity of our records, internal or external communications and reports, including the financial statements. Any suspected improper record keeping, must be reported immediately on the whistleblowing hotline.

We, especially individuals responsible for maintaining books of accounts and adequate relevant records, are accountable to:

1. Ensure never to alter or falsify Company's records.
2. Ensure not to execute off-balance sheet transactions, arrangements and obligations or maintain unrecorded funds or assets, unless permitted by applicable law or regulation.
3. Never make a false claim on an expense report or timesheet.
4. Ensure to sign documents and contracts within your authorized capacity and ensure accuracy and truthfulness.
5. Refrain from recording or approving false or misleading entries, unrecorded funds or assets, or unsupported payments.
6. Not concealing information that may lead to inaccurate representation of facts pertaining to the affairs of the Company.
7. Accurately recording payment to suppliers, consultants, brokers or other third parties for identifiable goods and services. These payments must be appropriate in relation to the value of the goods or services provided and accurately and fully recorded in enough detail to reflect the true nature of the underlying expense and its intended purpose

We must build and maintain an internal accounting system with processes and controls that:

1. Prevents unauthorized, unrecorded or inaccurately recorded transactions.
2. Results in preparation of financial statements based on generally accepted accounting principles.
3. Minimizes the risk of fraud, and misappropriation or misuse of our assets.
4. Ensures third parties who create or update Swiggy records follow the same rules, as appropriate.

Interacting with Auditors and Regulators - Our auditors have a duty to review our records in a fair and accurate manner. We must cooperate with them in good faith and in accordance with law. We must never mislead them in any manner regarding financial records, processes, controls or procedures or other matters which they may enquire about

We must fully and truthfully cooperate with any examination or request for information from a regulator or law enforcement agency. Any contact with law enforcement agencies or regulators must be coordinated through the Legal Department.

Record Retention - All Company records shall be maintained in accordance with our Document Retention and Archival Policy

Remember ...

DO NOT enter information in the Company's records or systems that hides the true nature of any financial or non-financial transaction or result.

DO NOT establish any undisclosed or unrecorded fund, account, asset or liability for any improper purpose.

DO NOT enter into any transaction or agreement that could affect the accurate and timely recording of revenue or expenses

6. Fair business conduct

Our products and services are primarily contractual promises. As we strive to outperform ourselves, we will do so honestly, openly, fairly and with integrity. We will deal fairly with our customers, members, providers, suppliers, regulators, shareholders and others around the world with whom we do business.

a. Anti-competitive practices

Swiggy stands firmly against any form of Anti-Competitive behavior. We abstain from entering into agreements with competitors aimed at manipulating prices, ensuring fair competition and safeguarding consumer interests.

Our commitment to compliance fosters an environment of free and fair competition in our interactions with business partners, suppliers and customers, promoting transparency and integrity in all business dealings. As the most important stakeholder at Swiggy, the onus falls upon all of us to build trust and practice fair competition by:

1. Avoid engaging in discussions with competitors that could be perceived as restricting fair competition, and promptly report any such interactions to your reporting manager and Legal Department.
2. Refrain from denigrating competitors or making false statements about their products; ensure sales and promotional activities are truthful and free from misrepresentation.
3. Refrain from entering into agreements with competitors that could influence prices, as they may constitute illegal price-fixing.
4. Avoid agreements that restrain trade, prices, or product quality, or aim to monopolize any aspect of commerce.
5. Do not initiate, discuss, or support boycotts against specific products or services offered by competitors.
6. Do not discuss or share sensitive competitive information (for example, relating to pricing or market share) with representatives of other companies or industry and trade associations, unless approved by your Reporting Manager, in consultation with your Business Head, who may also consult the Legal department, as appropriate.
7. Do not take part in industry or trade associations unless approved by your Reporting Manager, who may consult the Business or Functional head as appropriate.
8. Do not discard any document that could be pertinent to an anticipated or ongoing lawsuit or investigation related to Anti-Trust/Anti-Competition laws and regulations. In such matters, seek guidance from the Legal Department.

Remember ...

Anti-trust laws are intricate and complex and the risks associated with non-compliance of these laws and regulations can lead to severe consequences.

Warning signs include:

- a. Formal or informal understandings or agreements with competitors that set

- prices, or allocate production, sales territories, products, customers or suppliers
- b. Decisions to terminate business relationships, pricing of a product below cost, and certain other pricing and promotion policies, especially when we have a substantial share of the market
- c. Exchanging confidential information with competitors regarding pricing, marketing, production or customers

E. Protecting our information and assets

1. Safeguarding Swiggy's Information

Confidential information is a cornerstone of our organization, crucial for maintaining our competitive edge and preserving our reputation. Unauthorized disclosure of such information can jeopardize our standing in the market, undermine trust and compromise our relationship with stakeholders. Therefore, it is imperative that each of Us adhere to Swiggy's policies and procedures regarding the access, storage, and transmission of confidential data.

Our Information Security Policy sets out the expectations on each of us to safeguard confidential information of Swiggy and our third parties with the assurance of security, availability, integrity and confidentiality. The Acceptable Usage Policy provides the purposes for which IT resources may be legitimately used and highlights our cyber responsibilities which include keeping systems safe from inappropriate/unauthorized access and other cybersecurity breaches. These policies, together provide employees with the mandatory directive of safeguarding Swiggy's and client information.

Our Data Privacy Policy sets out the expectations on each of us to process personal information belonging to our employees, clients, agents, consultants, suppliers, and contractors in a manner so as to ensure compliance with all applicable privacy laws and regulations. Unless the Company has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, we are prohibited from disclosing confidential Company information.

We must refrain from accessing, creating, storing, or transmitting offensive content using Swiggy equipment or systems, including email and the internet. Any incident involving personal data/information (actual or suspected) or any incident involving unauthorized access/ use of systems or information held therein (actual or suspected) should be immediately reported to the infosec team via email at infosec@swiggy.com.

We must remain vigilant in safeguarding both Swiggy's proprietary information. This also includes restricting access only to those with a legitimate need, and refraining from discussing confidential matters in public settings. We must ensure that information or data is shared only on a need-to-know basis and not otherwise. By upholding these standards, we demonstrate our commitment to protecting our organization's interests and fostering a culture of trust and integrity.

Confidential information includes but is not limited to the following:

- a. Customer data: Personal information such as names, addresses, contact details, and order histories.
- b. Restaurant partner information: Contract terms, commission rates, menu pricing, and performance metrics.
- c. Delivery partner information including their PII, earnings data, performance metrics
- d. Business strategies: market share, new initiatives, marketing plans, expansion initiatives, and competitive analysis.
- e. Technology: Software code, algorithms, product workflows and proprietary technology used across

- multiple systems including order management, assignment and delivery tracking.
- f. Financial information: Revenue figures, profit margins, and financial forecasts.
 - g. Employee data: Employee PII, Human resources records, payroll information, and performance evaluations.
 - h. Operational procedures: Standard operating procedures, delivery protocols, and quality control measures.
 - i. Intellectual property: Trademarks, logos, branding materials, and proprietary business processes.
 - j. Market research: Consumer insights, trends analysis, and market intelligence reports.

The obligation to preserve Swiggy’s confidential information is ongoing, even after employment ends.

Remember ...

Safeguard the confidentiality of information pertaining to business strategy, financial and operating metric, third party PII amongst other data points. **You** are not expected to share such information unless explicitly authorized or if it is required by virtue of your role.

Report any breaches of this Code or inquiries regarding confidential information handling to Swiggy’s InfoSec team at infosec@swiggy.in

2. Intellectual property

We regard our intellectual property (IP) portfolio including trademarks, IP portfolio includes copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands and know-how domain names, trade secrets, proprietary technologies, brands and similar as critical to our success. These must be protected as a vital business asset.

It is important to ensure that to the extent permitted by law, the rights to all IP created using the Company's time and expense that are within the scope of our duties are assigned to and are the property of the Company. We should promptly disclose any works, inventions or developments we create to obtain legal protection over them.

a. Protecting Swiggy’s Intellectual Property

We must safeguard our IP and data and not misuse comes into our possession as a result of our association with Swiggy.

We should not share our work-related inventions, ideas or innovations or any of Swiggy's confidential information including trade secrets unless explicitly authorized to do so and having appropriate non-disclosure agreement or license agreement with the other party to whom such disclosure is made.

You must ensure you use names, logos, service marks or trademarks (“Marks”) only if approved and in accordance with Brand guidelines defined .

Display copyright notices, approved by legal, on all materials created by Swiggy for outside use or broad internal use.

Any kind of clarification for the use of Brand or logo can be obtained by writing to legal@swiggy.in

b. Respecting the intellectual property of others

We shall safeguard the confidentiality of all third party intellectual property and data. We shall not misuse such intellectual property and data that comes into their possession and shall not share it with anyone, except in accordance with applicable company policies or law.

Obtain written approval from the copyright owner prior to usage of all or part of a music audio, movie, newscast, podcast TV show or any Third Party(ies) copyrighted material for any Swiggy production or presentation Contact the Legal department for assistance.

Assume that all material on the Internet is copyright-protected even if no copyright symbol (designated by ©) is shown, unless explicitly mentioned otherwise.

You should promptly report the loss, theft or destruction of any confidential information or intellectual property and data of such other third party to infosec@swiggy.in and legal@swiggy.in

Remember..

We must respect the property rights of others by never misusing their assets, intellectual property or trade secrets, including the copying or downloading of unauthorized software, trademarks, copyrighted material or logos. We should never make unauthorized copies of computer software programs or use unlicensed personal software on company computers.

3. Proper Use of Swiggy Resources

Swiggy's resources are intended for Swiggy's business only and the use of Swiggy resources for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited. Resources include time, equipment and supplies, documents, and the information in our computing and communications systems. Swiggy may monitor or inspect information systems, E-mail, Internet use, Computer files, or anything kept in Swiggy's premises. Swiggy may do this at any time for any Company related purpose.

a. Electronic communications

Electronic communications (E-mail, the Internet, instant messaging, texting and interactive social media applications) can be useful business tools. We must use these electronic communications tools in a responsible, professional and respectful manner.

We should use our business email addresses for business purposes only. Any personal use of business email is strictly prohibited including signing up using business email to sign up for websites not related to work. All Company communications are the Company's property and that includes any email that is sent, received, created, or stored on a Company's computer or systems.

Stay alert and....

1. ***Do Not*** open email attachments from unknown sources
2. ***Do Not*** open links in emails from unknown or suspicious sources.
3. Never share passwords or user IDs and keep them strictly confidential
4. Do Not write or record passwords along with corresponding account information or usernames.
5. Do Not respond to non-trusted or suspicious appearing sources. Reach out to infosec@swiggy.in to verify if the source is trusted and exercise diligence before responding.
6. Encrypt any proprietary or sensitive confidential information before sharing via email.

Report any incident immediately at infosec@swiggy.in.

b. Safeguarding Swiggy's Assets

Our information technology, intellectual property (e.g., copyrights, patents, and trademarks), facilities, equipment, machines, software, and cash may be used for business purposes only and in accordance with applicable policies. The use of Company assets for unlawful, unauthorized personal or unethical purposes is prohibited.

Computer hardware, software, data, and facilities are valuable resources that need protection from potential destruction, theft, or misuse. These resources may also include confidential information that requires safeguarding. It is your responsibility to prevent unauthorized access through the use of passwords, or other security codes, and physical security measures (such as using computer cable locks, not leaving computers unattended in cars, and other normal precautions).

c. Business opportunities

You are strictly prohibited from using any Swiggy related information—including, but not limited to, data, business strategies, industry trends, financial details such as costs, earnings, etc. operational structures, or any insights gained through your association with Swiggy — for personal benefit or the benefit of a relative or friend. This applies to any business, professional, or consultancy engagement, whether for monetary or non-monetary consideration. Such adherence is expected of you, even after cessation of your association with Swiggy

F. Fair practices at work

At Swiggy, we are committed to fostering a fair workplace where every employee is treated with respect and fairness. Workplace harassment, discrimination, and bullying are serious issues that can negatively impact the well-being and morale of employees and potentially the performance of the employee in the organization. We have a zero-tolerance policy towards any form of harassment, discrimination, or bullying, and we expect all employees to adhere to the highest standards of professional conduct.

1. Discrimination and Harassment free workplace

We strive to provide a work environment free of any kind of discrimination, bullying, harassment, whether sexual or otherwise. We do not discriminate or allow harassment or bullying based on race, color, religion, disability, gender, nationality, sexual orientation, gender identity, gender expression, age, genetic information, LGBTQ, sexual preferences, education background, family income, etc. We are committed to adhere to fair employment practices and are an equal opportunity employer where employment decisions like regarding hiring, promotion, termination, transfer, leave of absence or compensation should solely be based on performance, abilities and merit.

We understand that harassment and abuse undermine the integrity of employee relationships and can cause serious harm to productivity, efficiency and a harmonious workplace. For these reasons,

We do not tolerate:

1. Threatening remarks, obscene phone calls, stalking or any other form of harassment
2. Causing physical injury to another
3. Intentionally damaging someone's property or acting aggressively in a manner that causes someone else to fear injury
4. Threatening, intimidating or coercing other employees on or off the premises at any time, for any purpose
5. Intimidation , offensive, hostile, abusive behavior directed towards third parties during their course of conducting business with Swiggy.

Remember

Harassment is any behavior that is unwelcome and unreasonably interferes with a person's ability to perform their job or creates a workplace environment that is intimidating, hostile or offensive. This would include slurs, name calling, inappropriate jokes, language or gestures, disorderly conduct and violence amongst others.

Sexual harassment includes harassment of a female employee consisting of any sexually tinted behavior, whether directly or by implication. This would include physical contact and advances, demand or request for sexual favors, making sexually coloured remarks, showing pornographic content or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Harassment based on individual attributes such as but not limited to race, color, religion, sex (including sexual orientation, gender) caste, creed, beliefs, age etc. would be considered **discrimination**.

Workplace bullying is any repeated less favorable treatment of a person in the workplace that is unreasonable and inappropriate. It includes behavior that intimidates, offends, degrades or humiliates a worker, possibly in front of others.

If you believe you have been subject to harassment (other than those that are sexual in nature), discrimination or bullying, you may report such incidents to voe@swiggy.in

If you have experienced sexual harassment at workplace, you may report such matters to icc@swiggy.in.

Refer the Discrimination & Harassment Prevention Policy and the Prevention of Sexual Harassment ('POSH') Policy for details.

Q&A:

I just learned that a good friend of mine has been accused of sexual harassment and that an investigation is being launched. I can't believe it's true and I think it's only fair that I give my friend an advance warning or a "heads up" so they can defend himself. Don't I have a responsibility as a friend to tell them?

Under no circumstances should you give them a "heads up". Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. An allegation of sexual harassment is a very serious matter with implications not only for the individuals involved but also for the Company. Alerting your friend could jeopardize the investigation and expose the Company to additional risk and possible costs.

2. Human Rights

We shall respect the human rights and dignity of all our stakeholders.

We do not use forced labor in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us

Upholding fundamental human rights is paramount at Swiggy. The following practices are strictly prohibited, with the paramount commitment to upholding human rights:

1. There is zero tolerance towards Child labor. We do not employ or support the use of child labor in any form. We support legitimate workplace apprenticeships and internships while adhering to relevant laws and regulations. Additionally, we encourage our third parties to adopt similar policies.
2. We ensure that all employees join and remain in employment voluntarily, in accordance with local laws and our company policies. Swiggy requires its third parties to adhere to the same standards regarding the prohibition of forced labor.
3. We emphasize the importance of ethical labor practices throughout the entire supply chain, and enforce fairness and dignity for all individuals.

3. Safe and Healthy Workplace

Swiggy takes employee well-being as a strategic value and fundamental concept of its success, and we define well-being as more than traditionally thought of occupational health and safety. We are committed to providing a safe and healthy workplace for colleagues and visitors to our facilities. This includes -

- a. Maintain a clean, safe working environment by keeping workstation, aisle and other workplaces free from obstacles, wires and other potential hazards.
- b. We prohibit carrying, storing, or the use of any type of weapon in Swiggy's owned, leased, or rented property; in a Swiggy-owned, leased, or rented vehicle; in a personal vehicle while on Swiggy business; or at a job site, whether on or off duty, unless you're explicitly authorized and have a legitimate business reason to do so.
- c. Always display and swipe your identification card when entering and exiting secure areas and do not allow others to enter/ tailgate without properly swiping their personal identification badges.

- d. Do not use, store or be under the influence of alcohol or illegal drugs or any substance or improperly used medication that could interfere with a safe and effective work environment or that could diminish your ability to perform your job.
- e. If **You** are convicted of or plead no contest to a drug-related crime occurring in the workplace, **You** are required to inform your Reporting Manager and HRBP immediately upon conviction or plea.
- f. If **You** believe that **You** have experienced or witnessed inappropriate behavior, these must be reported to voe@swiggy.in.
- g. If **You** observe any unsafe situations at work, please reach out to Administration In-Charge at your respective locations.

You must!

Inform your Reporting Manager if you're taking prescription drugs that “**You**” reasonably believe could affect your ability to work safely or efficiently.

Be responsible for the conduct of any Third Party(ies) that **You** might be hosting at the workplace.

G. Compliance with Laws and Regulations

Swiggy holds a steadfast commitment to adhere to all pertinent laws, regulations, and standards across its businesses and locations in which it operates. We must understand that Ignorance of a Law is not an excuse. This dedication underscores the Company's core values of conducting business ethically and responsibly, ensuring that every action aligns with our legal obligations

We are entrusted with the responsibility to abstain from engaging in any activities that may potentially lead to unlawful practices or compromise Swiggy's reputation and interests in any manner. This expectation extends to all aspects of business operations, emphasizing the importance of maintaining integrity and compliance at all times.

Swiggy encourages a culture of continuous learning and awareness among its workforce. We are expected to actively seek and understand the legal requirements relevant to our roles in Swiggy's operations. By staying informed and vigilant, we can proactively identify potential risks or compliance issues, and create adequate mitigation plans enhancing the overall governance, risk and compliance posture of the organization.

In instances where we encounter uncertainty or ambiguity regarding legal matters, Swiggy fosters an environment where seeking guidance and clarification is encouraged. Please seek guidance from your manager and the Legal department at legal@swiggy.in.

1. Insider Trading

We are a publicly listed company. This means that our shares are listed on the Bombay Stock Exchange and National Stock Exchange and are traded by the public. The price of our Company's share may fluctuate on the basis of publicly available information about the Company's activities.

Unpublished Price Sensitive Information (“UPSI”, also known as material nonpublic information) is information about a company that (i) is not in the public domain, and (ii) that an investor would find useful to decide whether or not to trade in the Company's shares. This could include information about financial results, dividends, change in capital structure, mergers, de-mergers, acquisition, delisting, disposal and expansion of business or changes in key managerial personnel amongst others. If

someone is aware of any UPSI of the Company and uses such information to buy or sell the Company's securities before such information is made public, they may be subject to penalties under insider trading laws.

How is this relevant to you?

In the course of our everyday work, as an employee, a consultant or a vendor, we may have access to UPSI. Under applicable securities laws, it is unlawful for a person who has such information to trade in the securities of the Company or to disclose such information to others who may trade. This activity is commonly referred to as 'insider trading'. Insider trading may lead to imprisonment, fines and insider traders may even be subject to private lawsuits.

Do Not disclose UPSI to anyone outside the Company. For any further questions on Insider trading or UPSI, write to secreterial@swiggy.in

2. Anti-Money Laundering and Anti-terrorist financing

Money Laundering occurs when someone directly or indirectly gets involved in any process or activity connected with the proceeds of crime including its concealment, possession, acquisition or use and projecting or claiming it as untainted property. Terrorism financing occurs when money or other resources are made available to commit criminal acts of terrorism or to support terrorist organizations

At Swiggy, we strictly engage only with entities and individuals conducting lawful business operations and deriving funds from legitimate sources. We maintain a firm stance against associating with those involved in criminal activities or listed on any sanction list. Swiggy is committed to being fully compliant with anti-money laundering and anti-terrorism laws worldwide.

Keep in Mind that **You** must not engage in or assist any individual:

- a. Engaging in financial transaction that promotes or results into a criminal activity
- b. Dealing with any third party, who are reluctant to provide complete information or provide insufficient, false, suspicious information, or information that cannot be validated at the time of onboarding or thereafter
- c. Participating in any act of terrorism, including providing financial support or otherwise sponsoring or facilitating any terrorist activity or organization.
- d. Entering into any arrangement or dealing with a third party that is connected to a Politically Exposed Person ('PEP') or listed on any sanction list.
- e. Engaging with any third party who expresses concern about or seeks to avoid reporting or record-keeping requirements as imposed by Swiggy.
- f. Engaging with any third party who requests to pay more than provided for in the contractual agreement.
- g. Making payments in currencies other than those specified in the contract.

H. External communication

1. Communicating publicly

External communication is a serious matter. It must be carefully managed because information put out with reference to our company or its businesses needs to be clear, truthful and not violate any undertakings we have given to other parties. In each business there are designated spokespeople to make statements externally. These managers should be alerted about any request for information you may receive or information you think we should give out. Only Senior Management personnel and those designated by Swiggy for Government relations or legal work can formulate and express Swiggy's views on legislation, regulations or Government action.

When communicating on any public avenue (including via the Internet or on social media sites) if our Swiggy affiliation is known, we must take care to keep your own views separate from Swiggy's views. In using social media, in particular blogs or social networking sites, you should exercise great caution while talking about our company or the business we do. It may feel like you are chatting with friends or expressing a personal opinion but even while doing so you cannot share any confidential information about our company.

Q&A

A representative of a media outlet has reached out to me for information regarding certain internal developments at Swiggy. What should I do?

All media inquiries should be directed to Corporate Communications for response at pr@swiggy.in. We must provide any comments to any external party unless expressly authorized by the Company to this effect.

Our company has recently announced an acquisition. In connection with this, your friend who is a journalist with a leading business magazine has asked you to provide some information that he could cover in his forthcoming article. He has promised not to quote you, or reveal your identity. Should you be giving him this information?

No. You should not be sharing information of this nature with the media, even if it is assured that the source would remain anonymous. All interactions with media with respect to business, operations or financial position must be directed to ir@swiggy.in and pr@swiggy.in

If we plan to author a book, article, or manuscript related to Swiggy's business, we must obtain prior approval from HR. In case the publication or article identifies us as a current or past employee of Swiggy, it should include the following disclaimer: *"The views expressed in this article/presentation are mine, and Swiggy may not necessarily endorse the substance, accuracy, or veracity of my views."*

Swiggy respects employees' rights to express themselves on social media platforms but advises exercising caution when discussing topics related to Swiggy, its stakeholders. In today's fast-paced and dynamic environment, individuals often share their ideologies, political viewpoints, achievements, and personal events on various social media platforms. As members of the Swiggy community, it is imperative to exercise responsible use of social media by ensuring **You**:

- a. Maintain professionalism in your online activities
- b. Refrain from posting confidential, non-public, or proprietary information online, including unpublished price-sensitive information.
- c. Avoid defaming, abusing, harassing, stalking, threatening, or otherwise violating the legal and privacy rights of any individuals or entities, on social media

- d. Refrain from posting messages containing racially or sexually offensive material, political or religious solicitations, or any other inappropriate content that may harm Swiggy or its stakeholders.

Swiggy reserves the right to monitor online activities related to the company and will investigate and take necessary disciplinary action, if any violations of company policies are identified.

2. Political activities

We shall act in accordance with the constitution and governance systems of the country in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any system of government. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence/favor with any political body or person, and we do not offer or give any company funds or property or other resources as donations to any specific political party, candidate or campaign.

Our responsibilities include

1. Take steps to ensure that your individual political opinions are not viewed as that of Swiggy
2. Ensure to avoid associating Swiggy or the appearance of Swiggy with our political work, political opinions, or that Swiggy endorses our political activity.
3. We cannot commit Swiggy resources to any corporate political spending, donation, services etc.
4. Never pressure another employee, customer, business partner to contribute to, support or oppose any political group or candidate
5. Employees campaigning for political office must not create or appear to create a conflict of interest with their duties at Swiggy.
6. “We” must acknowledge and uphold the diversity of political viewpoints among our colleagues.
7. “We” are not permitted to engage in making, sharing, criticizing, or endorsing politically charged statements on any social media platforms. Should we choose to express personal political views online, it is mandatory to clearly specify that these views are personal and not representative of Swiggy.

Q&A

My spouse is contesting for a political office and I believe he/she is an eligible candidate. Can I campaign for him/her at the workplace amongst colleagues?

No, you cannot. You should keep this off-limits at the workplace.

3. Using Swiggy resources for political purposes

The use of any Swiggy resources for personal political activities is prohibited. **We are** prohibited from directly or indirectly committing or utilizing Swiggy’s resources for personal political activities, including but not limited to funds, facilities, any property, or official working time of our colleagues.

4. Lobbying

Lobbying is the practice of communicating with government officials and Industry Associations about matters that are important to Swiggy. Examples of lobbying activities include oral, written or electronic communications to a Government official or a Government employee regarding

- a) Formulation, modification or adoption of a legislation, rule, regulation, executive order, policy or position of the Government; or
- b) Administration of execution of a legislative program or policy; and the nomination or confirmation of a person to the Government

If our work includes meetings with government, elected officials, all of which might be construed as ‘lobbying’, we must be aware that such activities are regulated. We should not claim to represent our Company at such meetings unless we are specifically designated by the Company to do so. As a general rule, communications with Government personnel are the responsibility of specific groups within Swiggy.

All other employees and other parties, with the exception of certain designated employees, must seek authorization from the appropriate group before contacting, responding to, or meeting with Government personnel.

Third Parties undertaking lobbying activities on behalf of Swiggy are also covered under the purview of this Code.

Guidelines for us and any Third Parties undertaking lobbying with Government or Industry Associations on behalf of Swiggy are summarized below:

- a. Demonstrate professionalism, honesty, integrity, openness, and transparency in all interactions.
- b. Engage responsibly in stakeholder consultations, providing fact-based information and technical expertise to policymakers.
- c. Adhere to all applicable laws and regulations governing lobbying activities.
- d. Respect the confidentiality of any information obtained during the lobbying process.
- e. Always be in compliance with the Anti-bribery and Anti-corruption policy and when in doubt clarify by writing to legal@swiggy.in

I. Administering the Code of Conduct

The Ethics committee of the Company, composed of the Chief Human Resources Officer, Chief Risk Officer (also the Head of Assurance and Business Advisory) and the General Counsel shall be responsible for administering the Code and report to the Board and its Committees on matters pertaining to enforcement of the Code.

The matters covered in this Code are of the utmost importance to Swiggy, its shareholders and its business partners, and are essential to the Company's ability to conduct its business in accordance with its stated values. We expect all our directors, officers, employees and third party agents to adhere to these rules in carrying out their duties for the Company.

Speak UP :

1. **We must** report any concern pertaining to actual or suspected:

- Breach of the Code of Conduct.
- Violation of other policies and procedures of Swiggy.
- Violation of applicable laws and regulations.
- Any action or failure to act that may result in reputational harm to Swiggy or is detrimental to the company's interests.

All concerns should be addressed on the whistleblower hotline that provides multi-faced and independently managed reporting channels:

- By calling (Toll-free) at 1800-102-6969
- Online at: <https://swiggy.integritymatters.in>
- By Email: swiggy@integritymatters.in
- Alternatively, you can also write a letter addressed to:
- Swiggy, C/o Integrity Matters, Unit 1211, Centrum, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West – 400604, Maharashtra, India.

Directly to the Chairman of the Audit Committee at chairman.ac@swiggy.in.

You may also refer to the Whistleblower policy for details or write to ethics@swiggy.in for any clarifications you may require.

2. **For Grievances relating to harassment, sexual or otherwise:** These must be raised by writing to the internal complaints committee as per the prevention of sexual harassment policy on icc@swiggy.in
3. **Voice of Employees:** : If faced with any challenges in finding a resolution or if dissatisfied with the response provided by the Reporting Manager or HR Business Partner, employees can directly write to "Voice of Employees" at voe@swiggy.in. This exclusive platform ensures that grievances are directly addressed by the Head of Human Resources, and handled with utmost care, confidentiality and objectivity.

Remember....

Retaliation is against our values.

- *All reports can be made in good faith without fear of retaliation.*
- *We strictly prohibit dissuading individuals from reporting unethical practices or improper conduct.*
- *Any threats, retribution, or retaliation against individuals who have reported any actual or suspected violations involving Swiggy, in good faith, or those assisting in investigations, are strictly prohibited. We maintain strict confidentiality regarding any reported potential*

violations. This entails refraining from discussing such matters with unauthorized individuals and only communicating with designated representatives.

4. Disciplinary action

We take violations of this Code, Company policies and applicable laws seriously. Where appropriate, the Company takes prompt corrective action, up to and including termination of employment. We strive for consistency and fairness in disciplinary action for Code violations. Disciplinary action may include a verbal or written warning; suspension with or without pay; loss or reduction of bonus or stock options; or, for the most serious offenses or repeated misconduct, termination of employment.

Any disciplinary action depends on the nature, severity, and frequency of the violation. It may vary depending upon local law. Please understand that those who violate the laws or regulations mentioned in the Code could expose themselves and the Company to substantial civil damages and criminal penalties.

Disciplinary action may be taken in cases of:

1. Violation of the Code, Company policies and procedures, or applicable laws.
2. Directing others to violate the Code, Company policies and procedures, or applicable laws.
3. Failure to report despite being aware of a violation or potential violation.
4. Not cooperating in a Company audit, review or investigation.
5. Retaliation against someone for (i) reporting a concern in good faith or (ii) for participating in an investigation.
6. Disclosure of information learned during an internal investigation.

5. Help or Assistance

The Code serves as a valuable resource to navigate and provide guidance and support whenever we encounter ethical dilemmas or have questions regarding acceptable behavior in the workplace. While the Code provides comprehensive guidance, it cannot possibly address every situation we might face at work. Therefore, the Code is by no means a substitute for our good judgment. We must remember that each of us is responsible for our own actions and is incumbent on us to make the ethical choice.

When confronted with a dilemma, it is advisable to first assess our responses to the fundamental '*Guiding Questions for Ethical Decision-Making*':

- Does it align with the core values of our organization?
- Is it morally correct? Is it lawful and does it align with our policies?
- Have I explored all possible alternatives?
- Am I comfortable discussing my decision with others?
- Would I feel proud of my decision?
- What could be the repercussions of my actions on others, including colleagues and other stakeholders?

In case of any concerns or doubts regarding any provisions of this Code, it is advisable to seek clarification by reaching out to either the Human Resource Business Partner or to the Ethics team by writing to ethics@swiggy.in.

6. Modifications, exceptions and waiver:

Modifications: Any proposed amendment to this Code must be approved by the Ethics Committee and the Audit committee thereafter.

Exceptions: Swiggy reserves unconditional right to amend, abrogate, modify and / or rescind any of the provisions of this Code at any time.

Waiver: Any waiver of our Code requires the prior written approval of the Ethics Committee. Waivers will be promptly disclosed as required by applicable law.

J. Glossary

- a) **“Bribery”** includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust in order to gain any commercial, contractual, regulatory or personal advantage. A bribe may be anything of value and not just money and often involve gifts, inside information, hospitality or entertainment, sexual or other favors, offering employment to a relative, payment or reimbursement of travel expenses, or anything else of value that is intended to drive behavior in a manner desirable to the person offering the bribe..
- b) **“Code”** shall mean Code of Conduct of the Company as may be amended from time to time.
- c) **“Corruption”** is the abuse of public or private office for personal gain and includes wrongdoing on the part of those in power through means that are illegitimate, immoral or incompatible with ethical standards and is associated with bribery.
- d) **“Third Party(ies)”** means any individual or organization that **You** may come into contact with during the course of your engagement with the Company, and includes any individual or organization, who transacts/interacts with Swiggy and also includes Actual and Potential Clients, Suppliers, Vendors, Distributors, Strategic Partners, Business Partners, Consultants, Business Contacts, Intermediaries, Representatives, Investors, Research Analysts, Agents, Advisers, Joint Ventures and Government & Public Bodies including their Advisers, Representatives and Officials, Politicians and Political Parties.
- e) **“Relatives”** means spouse and children including step children, siblings, parents and immediate family of such person’s and their spouse’s siblings, parents and their immediate family. Immediate family shall include spouse, siblings, parents and children of the individual. Spouse shall be deemed to include partner(s) or described through any other term that may be used to depict a similar relationship. This includes a dependent who can be financially dependent on you, or who you are financially dependent on regardless of relationship.
- f) **“Weapon”** includes firearms, knives, clubs, ammunition, explosives or any other device or object that can be construed as a weapon by the local administration that are primarily used to inflict injury. Weapons do not include tools that are used for legitimate business purposes.
- g) **“Workplace”** in addition to all offices of the Company including registered office, branch or city offices, warehouses, dark stores, kitchens or similar places by whatever name they may be referred to, shall also include an employee's own home, leased/rented home, a company leased home, or any other form of accommodation or location from wherever work or conduct of official business takes place.

| Version Number | Date | Details |
|-----------------------|------------------|--|
| 1.0 | October 28, 2024 | Changes approved by the Ethics Committee & the Audit Committee of the Board of Directors |