

# ELECTRODRIVE POWERTRAIN SOLUTIONS PRIVATE LIMITED

CIN : U74999TZ2017PTC029256



ELECTRA EV ETHICS AND CODE OF CONDUCT POLICY

## ELECTRODRIVE POWERTRAIN SOLUTIONS PVT LTD (Electra EV)

### Effective Date: 01.04.2024

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Ver No.	Change Description	Prepared By	Reviewed By	Approved By	Date
1.0	New Policy	Head-HR	Head-HR	Executive Director & CEO	01.04.2024

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## 1. Purpose

This policy defines the ethical principles, responsibilities, and standards of conduct to be followed by all employees, contractors, consultants, and business associates of ELECTRA EV. It also provides a structured mechanism for reporting, investigating, and resolving ethical concerns and violations.

## 2. Scope

This policy applies to:

- All employees of ELECTRA EV, irrespective of level or role.
- Contractors, consultants, and temporary workers engaged by ELECTRA EV.
- Business associates, suppliers, and vendors representing or working with ELECTRA EV.

## 3. Ethical Standards and Commitments

### 3.1 Corporate Citizenship

- ELECTRA EV recognizes its role as a responsible corporate citizen.
- I will support social development initiatives that benefit local communities and treat them as an integral part of our business strategy.

### 3.2 Professionalism and Integrity

- I will act with honesty, professionalism, and fairness.
- I will uphold the highest moral and ethical standards, respecting cultural norms in every geography where ELECTRA EV operates.

### 3.3 Compliance with Laws

- I will comply with all applicable laws, regulations, and industry standards.
- Where a conflict arises between local laws and this Code, the stricter requirement will apply.
- Employees must also ensure compliance with competition and antitrust laws, avoiding practices such as price fixing, bid rigging, or collusion

### 3.4 Zero Tolerance for Corruption

- I will not participate in bribery, corruption, collusion, restrictive trade practices, or any other unethical business practices.
- All business transactions must reflect transparency, integrity, and compliance with the law.

### 3.5 Prohibition of Undue Favors

Version 1.0

Internal

01.04.24

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Registered Office: SF No. 698/3, Irugur, Michael Job College, Ravathur, Suler, Coimbatore, Palladam, Tamil Nadu, India - 641402.

Corporate Office: Survey No. 255/1/8, Opposite New PVR Mall, Hinjewadi Phase-2, Pune - 411057.

E-mail: [secretarial@electraev.com](mailto:secretarial@electraev.com) | Website: [www.electraev.com](http://www.electraev.com) | Telephone No.: 020 - 6799 2300

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- I will not, directly or indirectly, offer, solicit, or accept bribes, kickbacks, or any favors designed to improperly influence business decisions.

## 3.6 Conflicts of Interest

- I will disclose in writing any financial or personal interest with vendors, customers, or associates operated by immediate family members or relatives.
- Both actual and perceived conflicts of interest must be reported and appropriately managed.

## 3.7 Gifts and Hospitality

- I will not give or accept gifts or hospitality exceeding a value of ₹1000.
- Any exceptions require prior written approval from senior management.

## 3.8 External Engagements

- I will seek prior written approval before participating in any external civic, public, political, or business engagements that may conflict with my duties at ELECTRA EV or affect its reputation.

## 3.9 Integrity in Records and Communications

- I will ensure accuracy, transparency, and completeness in all records, communications, and financial documents.
- I will not engage in misrepresentation, falsification, or concealment of information.
- Any loss or breach of confidential information, whether ELECTRA EV's or a third party's, must be reported immediately.
- Confidential and personal data must be handled responsibly, and company IT systems must be used only for authorized business purposes. Unauthorized access, sharing, or misuse of IT assets is strictly prohibited.

## 3.10 Anti-Fraud and Anti-Money Laundering

- I will comply with applicable anti-fraud, anti-bribery, and anti-money laundering regulations.
- I will support the establishment of robust internal controls to detect, prevent, and report potential violations.

## 3.11 Harassment-Free Workplace (POSH & Non-Discrimination)

- ELECTRA EV is committed to maintaining a workplace free from harassment, discrimination, and victimization of any kind.
- Harassment based on gender, caste, religion, disability, sexual orientation, age, or any protected characteristic is strictly prohibited.
- All employees must comply with the Company's POSH (Prevention of Sexual Harassment) Policy and extend full cooperation with the Internal Complaints Committee (ICC).
- Retaliation against complainants or witnesses will not be tolerated.

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## 4. Escalation Mechanism for Ethics Violations

To ensure timely and effective resolution of ethical concerns, the following escalation framework shall apply:

### Level 1 – Immediate Supervisor / Functional Head

- Concerns should first be raised with the direct supervisor or functional head.
- If unresolved, or if the concern involves the supervisor, escalate to Level 2.

### Level 2 – Human Resources Department

- HR will confidentially review and investigate the concern in coordination with the Ethics Officer or Internal Audit.
- An investigation report will be completed within 7 working days of receiving the complaint.

### Level 3 – Senior Management

- Serious or repeated violations will be escalated to Senior Management.
- Depending on the severity, disciplinary actions may include:
  - Written warnings
  - Suspension or dismissal
  - Termination of contracts
  - Legal proceedings or blacklisting of vendors

### Level 4 – Anonymous Reporting (Whistleblower Policy)

- Employees may choose to report concerns anonymously under ELECTRA EV's Whistleblower/Vigil Mechanism Policy.
- All anonymous complaints will be treated with seriousness and confidentiality.

## 5. Non-Retaliation Assurance

ELECTRA EV strictly prohibits retaliation against any individual who, in good faith, reports a suspected violation of this Code.

- Any retaliatory action will itself be treated as a serious violation and may attract disciplinary measures.
- Employees are encouraged to speak up without fear of negative consequences.

## 6. Accountability and Enforcement

- All employees and associates are responsible for understanding and complying with this Code.
- Violations will be subject to disciplinary action, up to and including termination of employment or contracts.

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- Regular training and awareness sessions will be conducted to reinforce ethical behavior.
- Suppliers, vendors, and business partners are also expected to comply with this Code. Any breach by a third party may result in termination of the business relationship.

## 7. Policy Review

This policy will be reviewed periodically by the Ethics & Compliance Committee to ensure alignment with legal requirements, industry practices, and ELECTRA EV's evolving business environment.

## 8. Employee Acknowledgement

**I confirm that I have read and understood the Code of Conduct & Ethics Policy of Electra EV. I agree to comply with the principles and standards contained in this Code and understand that any violation may result in disciplinary action, including termination of employment.**

Signature:

Name:

Date: