



## **CODE OF CONDUCT**

### **Why we have a Code of Conduct**

Trust is fundamental to everything we do.

Doing what's right means we must always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the communities in which we work.

Our Code of Conduct sets out what we expect from every single person working for and with Transformers & Rectifiers (India) Limited (T&R). It also underlines our responsibilities to our people, partners and shareholders.

The Code of Conduct helps us all make informed decisions.

### **The T&R Way**

The T&R Way sets out our core values for how we work so we can be admired by our customers, shareholders, the people we work with and the communities we work in.

### **Our Business Principles**

Our Business Principles are the foundation for how we do business everywhere we operate and are at the heart of our Code of Conduct.

The Transformers & Rectifiers (India) Limited way:

- Act with SPEED
- Behavior will reflect TRUST
- Adopt a BOLD Mindset
- PASSION in everything we do

### **Our Business Principles**

#### **Individual Conduct**

- We act with honesty, integrity and fairness in our dealings both internally /externally and shall abide by the laws of the land.
- We avoid any contracts that might lead to, or suggest, a conflict of interest between personal activities and the business.



- We shall not offer, give or accept bribes in cash or anything of value, including improper offers of payments or gifts / hospitality to or from employees that might appear to incur an obligation in order to secure gain.
- We pursue mutually beneficial relationships and seek to promote the application of our Business Principles with our business partners and suppliers and shall take decisions in the best interest of the Company, including consideration of T&R's brand and reputation.
- We shall deal with others (including each other) in a fair and dignified manner, including being diversity sensitive and not using foul/abusive language.
- We shall be responsible to the best of our knowledge, for fair representation and accuracy of information the documents prepared or signed off by us.
- We shall ensure that personal information provided to the organization is factual and accurate including prior work experience, educational qualification, compensation details, etc.
- We shall not use organization time and resources for personal gain
- We shall adhere to Company policies, processes, systems and regulations in letter and spirit.
- We shall secure the physical, financial and intellectual property / assets, interests of the organization by observing the discipline of internal controls.
- We shall ensure safe and secure working environment for ourselves and others
- We shall support the larger organization by sharing knowledge, information and resources available in our respective area of influence.
- When we come across or handle confidential data about the Company and personnel, we 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.
- We 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 its usage.
- Each one of us shall take prompt action / decision on any report that is received regarding a Value departure / Violation or Code of Conduct



### **Compliance with the law**

- We comply with the provisions of all applicable local laws and international laws (as applicable) with appropriate standards and principles.

### **Health and safety**

- We protect the health, safety and wellbeing of our customers, employees, partners and the communities in which we operate and disclose any information that comes to our knowledge that clearly demonstrates that any of our products or services breach internationally accepted safety standards or guidelines

### **Public Policy**

- We do not make gifts or donations to political parties or intervene in political matters or incur expenses on behalf of T&R for any political campaign, political party, political candidate or any of their affiliated organizations.

### **Communications**

- We communicate openly and transparently with all our stakeholders within the bounds of commercial confidentiality.
- We protect confidential information from improper disclosure, and any authorized communication of confidential information should be limited to individuals on a need to know basis and who need it to carry out their work.

### **Customers**

- We value the trust our customers place in us and safeguard the information provided to us.

### **Employees**

- We base relationships with and between employees on respect for individuals and their human rights and do not tolerate child labor.
- We do not accept any form of discrimination, harassment or bullying.
- We pursue equality of opportunity and inclusion for all employees through our employment policies and practices.



**What is the Code of Conduct?**

The Code of Conduct is our central policy document, outlining the requirements that every single person working for and with T&R must comply with, regardless of location.

To ensure that there is a common minimum standard of professional behavior, there is a need for all employees to be aware of the Code of conduct listing identifiable and non-negotiable set of actions/behavior applicable to all employees across the company.

**Who is the Code of Conduct for?**

Our Code of Conduct is for everyone working for and with T&R: employees, directors, contractors, subsidiaries, joint ventures and suppliers. We expect our suppliers and business partners to uphold the same standards. This is available with the Compliance team. Each one of us shall commit to the Code of Conduct on joining and at periodic intervals.

**What are the consequences of not complying?**

There are very serious consequences for not complying with our Code of Conduct. We may take disciplinary action and even dismiss employees' where necessary.

**What does this mean for me?**

We expect you to:

- Behave in an ethical manner, take pride in your actions and decisions
- Comply with the principles and rules in our Code of Conduct and fulfil your legal and regulatory obligations
- Understand the T&R Way and apply our Business Principles to your work
- Speak Up if you feel a working practice is not ethical or safe or if it breaches our Code of Conduct.

**Following the law**

The Code of Conduct broadly covers all of the prevalent laws and regulations. Always be familiar with the relevant laws and regulations that apply where you work. If in any doubt, contact your Reporting Officer, Legal, HR, or Compliance team.

**Approved By :**

Head HR

**Released on:**