

Endurance Technologies Limited

Code of Conduct for Employees

Purpose of ECOC

The Endurance Code of Conduct (ECOC) articulates the values, commitment and ideals that guide and govern the conduct of Endurians towards our colleagues and other stakeholders. It is our guiding light when we are confronted with ethical dilemmas. This Code is intended to drive a culture of mutual respect, inclusiveness, integrity, collaboration, and end-to-end accountability while always putting Endurance's success ahead of individual and team interests. It is imperative that we manifest the ECOC in our all decisions and actions. The ECOC outlines Endurance's ethical standards and responsibilities of our employees along with examples of how to act ethically when we face ethical dilemmas which might leave us at cross roads.

A. Respect all individuals

I. Ensuring human rights

At Endurance, we champion fundamental human rights for all individuals. We are committed to foster a culture where each employee's/ stakeholders' personal dignity is respected. We continuously strive to provide all our employees a safe working environment free from harassment, abuse, and hostility. We have zero tolerance for any individual who engages in abusive behaviour, demonstrates violence, uses inappropriate language/ gestures, or conducts himself/ herself in any manner that leads to a hostile work environment for any individual including interferences with that individual's ability to fulfil her/ his job responsibilities. This culture of zero tolerance also applies to violations to our Policy on Safety & Security and Prevention of Sexual Harassment of Women Employees (POSH Policy)

Responsibilities of employees:

- a. Understand and drive adherence of policies designed to develop a safe and professional workplace including POSH Policy
- b. Observe, look out for, and proactively highlight any signs of violations of human rights including hostile behaviour in the workplace
- c. Communicate our standards to all our external stakeholders including customers, vendor partners, business partners, contractors, and service providers and ensure they adhere to them
- d. Choose language and manner of communication in the most appropriate way based on needs of the situation
- e. Do not tolerate harassment of any nature including unwelcome verbal communication or physical conduct
- f. Report/ escalate disrespectful behaviour by fellow colleagues and stakeholders
- g. Maintain the official decorum in all business operations and interactions with fellow colleagues as well as external stakeholders

II. Promoting diversity and equal opportunities

Diversity is a strategic priority for Endurance. We do not discriminate on the basis of gender, religion, ethnicity, age, race, sexual orientation, or disability. We believe in developing sustainable competitive advantage through a diverse work place. By driving a diverse and collaborative culture, we are able to continuously challenge ourselves, and foster innovation. We are committed to valuing and integrating diverse and unique perspectives in our decision-

making. We continuously strive to consciously eliminate our explicit and implicit biases to make our workplace more inclusive. We are proud to be an equal opportunity workplace.

Responsibilities of employees:

- a. Make all employment decisions (including recruitment, career advancement, separation) solely based on competence, performance, and potential*
- b. Build an inclusive and collaborative culture integrating views from diverse individuals while taking decisions*
- c. Remain aware of your preconceived notions and biases that may impede your decision making and consciously work on eliminating them*
- d. Treat all individuals with respect irrespective of their background, gender, race, religion, ethnicity, caste, age, tenure, or level*
- e. Ensure zero tolerance for discrimination of any nature*
- f. Build a culture for open sharing of ideas without inhibitions for all individuals regardless of their background*
- g. Report/ escalate against any colleague who discriminates, abuses, or humiliates colleague(s) or stakeholder(s) with respect to their gender, religion, ethnicity, caste, disability, age, race, sexual orientation, or background*

III. Driving a culture of prioritizing Environment, Health, & Safety and Sustainability

EHS is a basic human right and key corporate objective for Endurance. We continuously strive to provide a healthy and safe work environment for all our employees and any individual who enters our premises. We have built a Safety First culture ensuring zero tolerance for EHS violations. We understand that it is our responsibility to proactively assess and mitigate the socio-ecological impact of our actions on internal and external stakeholders. We consistently prioritize human lives and environment in our decisions. We actively monitor and improve internal controls for adherence to EHS guidelines. We foster a culture of transparency in reporting violations and sharing learnings from them with relevant stakeholders. We will always drive initiatives to nurture sustenance of environment, health, and safety.

Sustainability is a strategic priority for Endurance. We believe in reducing inequity with every community we transform, every child we inspire, and every individual we empower. In doing so, we are able to support individuals and communities to become independent and to achieve their full potential. Our holistic approach of working with communities to address complex issues by driving initiatives across education, health & sanitation, livelihood generation, and environment focus areas enables us to deliver a lasting impact. We are determined to act as catalysts to equip individuals with the right skills, tools, and resources where they can thrive and create a sustainable change in their communities for future generations.

Responsibilities of employees:

- a. Identify, assess and manage the environment impacts of our existing and planned operations*
- b. Prioritize EHS while making decisions*
- c. Wear the required Personal Protective Equipment (PPEs) wherever required, while working in Endurance's or any external stakeholder's premises and follow Standard Operating Procedures (SOPs)*
- d. Report non-compliance(s) and unsafe acts to corporate EHS Head immediately simultaneous to informing the plant EHS official concerned*
- e. Do not compromise on safety in the pursuit of meeting financial targets*
- f. Report non-compliances of EHS laws and regulations by our vendor partners to Endurance's senior management immediately*

- g. Report instances where our vendor partners have not welcomed audits or inspections to Endurance's senior management immediately.
- h. Understand and adhere to the Company's Emergency Preparedness and Rescue plan processes during emergencies
- i. Proactively participate in evacuation, relief and rehabilitation during emergencies
- j. Proactively explore if any redundant resources can be recycled or reused to drive sustainability

B. Align every action and decision to ethical values

I. Driving CITTI values

At Endurance, we believe building a high performance culture is one of the few sustainable competitive advantages we can leverage consistently. Values help us in fostering this culture as they are the principles which guide our decisions and actions. We are committed to live by our core beliefs and CITTI values (Customer Centricity, Integrity, Transparency, Teamwork, and Innovation). These are the five pillars that shape the culture of Endurance and demonstrate our commitment to internal and external stakeholders. We believe demonstrating these values in our actions has made us a globally trusted brand, while enabling us to achieve high standards of governance and business conduct.

Responsibilities of employees:

- a. Understand and live the CITTI values and drive adherence to these values without exception
- b. Proactively report/ escalate any departure from CITTI values
- c. Anticipate, swiftly respond, exceed internal and external customer requirements, while consistently closing loops
- d. Ensure zero tolerance for breaches of integrity (including data integrity) without exception
- e. Ensure all financials and data recorded or shared is accurate and complete and do not disguise or hide the true nature of any transaction or event
- f. Always verify the accuracy of data before sharing with fellow colleagues/ stakeholders
- g. Proactively highlight if you are aware if there are any ethical violations including data integrity to your supervisor and Corporate HR
- h. Do not approve inaccurate or misleading entries, unrecorded assets or payments without legitimate supporting documents
- i. Sign documents only if you believe the information stated is accurate
- j. Drive open and effective communication while driving self and team to actively listen to diverse view points and respond respectfully
- k. Collaborate effectively by forging interdepartmental relations and by proactively surface problems to relevant stakeholders for solutions
- l. Proactively reward and share learnings from failures with relevant stakeholders
- m. Challenge existing beliefs, simplify ideas, and drive self and team for value creation and continuous improvement
- n. Proactively stop and report any malicious propaganda against Endurance, our employees, and our stakeholders

II. Avoiding conflict of interest

We are committed to Endurance and consistently prioritize Endurance in our decisions and actions. We proactively avoid actions and decisions involving a potential or actual conflict of interest which can interfere with our ability to make an objective decision for Endurance. The conflicting interest, direct or indirect, need not be

limited to financial gains and can include improper personal benefits or preferential treatment, as a result of our position, including favours for family and friends, career advancement, and involvement in an external business. Employees are prohibited from influencing the hiring/ recruitment of their relatives in any position with or without remuneration in the organisation. In the event of any relative seeking an opportunity to be employed with the Company, the concerned employee shall inform the Head – Human Resources. The recruitment shall be done as per the rules laid down therein by the Company in conformance with the standards set for recruitment of employees in the Company. Conflicts of interest can undermine the trust we have gained from our stakeholders and can damage the reputation of Endurance. We continuously strive to uphold the highest standards of integrity and have built a culture of zero tolerance for breaches in ethical values.

Responsibilities of employees:

- a. Consistently put Endurance's interests first in all actions*
- b. Discuss any potential conflict of interest with your supervisor and make a disclosure to the respective HR manager for appropriate resolution*
- c. Proactively address any situation that could be perceived as putting your interests or that of a relative or friend in conflict with the interests of Endurance*
- d. Proactively highlight if you have any relative(s)/ friend(s) working at Endurance*
- e. Do not seek outside employment/ remunerative engagement including self-employment whilst you are in the service of Endurance*
- f. Proactively report any stakeholder who has made an offer that leads to conflict of interest*

III. Preventing corruption

We are committed to operating our businesses conforming to the highest ethical standards, free from any influence of corruption. Any act of fraud or corruption in or against the Company or any abetment to such fraud/ corruption is unacceptable and will not be tolerated. We expect our employees and business partners to avoid even the appearance of offering or accepting a bribe. While selecting vendors, contractors or business partners, we must conduct a due diligence to ensure they are capable and meet our ethical standards. We do not support any specific political party or candidate. We conduct our business in a manner that could never be interpreted as favouring any political party or candidate.

Responsibilities of employees:

- a. Proactively highlight if you have any relative(s)/ friend(s) working with our key stakeholders' including our vendor partners, customers, and contractors*
- b. Do not offer, promise to offer, or receive any improper payments or benefits that are intended or perceived to obtain favours under any circumstances*
- c. Do not make any donations on behalf of Endurance without due approval under the Company's Schedule of Authority*
- d. Conduct due diligence of vendor partners, contractors, business partners objectively and based on ethical standards and merit*
- e. Ensure due diligence involving a related party is conducted by another colleague who is not interested in such transaction*
- f. Do not maintain "off-book" accounts to conceal improper payments. All expenditures must be accurately presented in Endurance's books and records*
- g. All receipts and expenditures must be correctly and properly recorded in Endurance's book of accounts and other records*
- h. Proactively disclose and escalate the information about any employee/ group of employees involved in corrupt practices by providing relevant evidence*

- i. Do not commit any Endurance resources for any political party or candidate without due approval under the Company's Schedule of Authority and approval from Board of Directors where required
- j. Proactively report any colleague who is influencing other colleagues to support allegiance with a political party/ candidate
- k. Do not accept any gift/ object of value exceeding Rs. 5000 from vendor partners, customers, service providers, contractors, or any other stakeholders in any financial year

IV. Prohibition of alcohol, drugs, tobacco and smoking

All forms of substance abuse as well as use/ distribution of alcohol, cigarettes, tobacco, and drugs is prohibited in Company premises or in the course of Company duties as it leads to safety risks.

Responsibilities of employees:

- a. Do not smoke or consume or distribute alcohol, drugs, cigarettes and tobacco in Company premises (including guest houses and company vehicles) and while working for Endurance outside company premises (premises of our customers and our vendor partners)
- b. Do not carry alcohol, tobacco, cigarettes, and drugs to the workplace (including guest houses, company vehicles, premises of our customers and our vendor partners)
- c. Proactively report if any colleague is using or distributing alcohol, tobacco, cigarettes, drugs or any other intoxicating material in Company premises or while working for Endurance outside company premises
- d. Stop colleagues and other stakeholders from forcing any individual to consume alcohol, tobacco, drugs, cigarettes

C. Prioritise commitment to Endurance and its key stakeholders

I. Protecting, ETL, customers, vendor partners, and other key stakeholders' information and assets

At Endurance, we believe it is our responsibility to respect and protect the intellectual property and assets of the Company and that of our stakeholders. These should not be misused and should be deployed for the purpose of conducting business for which they are duly authorised. These include tangible assets such as equipment and machinery, systems, facilities, materials, resources as well as intangible assets such as patents, trademarks, proprietary information, and relationships with customers and suppliers. We are committed to ensuring that our employees restrict/ limit access, store, and share intellectual property (IP) and data in a manner consistent with our procedures and policies.

We expect our employees to seek authorization from the relevant stakeholders prior to disclosing any information. This includes disclosure via any forum, media, or social media. The Chairman of the Board, the Managing Director, the Executive Directors and the Group Chief Financial Officer of the Company alone are authorised to interact with the media in matters relating to the Company's financial performance and results. In other cases, the Chairman / Managing Director may from time to time, authorise other directors/ senior employees to interact with the media or other persons. The Chairman, the Managing Director, Executive Directors, the Group Chief Financial Officer, the Company Secretary and the Head of Investor Relations alone are authorised to interact with investors. Care must be taken not to disclose information that can hurt the legitimate business interest of the Company or where disclosure is in violation of any contractual obligation of the Company, like information received lawfully by the Company under a binding non-disclosure agreement. Any enquiry from or confirmation sought by the media, press or investors on the matters concerning the Company, should be directed to such designated spokesperson.

The unauthorized sharing of confidential data can cause Endurance to lose a competitive advantage or can damage our reputation or the reputation of our stakeholders. We expect all employees and relevant stakeholders to ensure that our assets are not misused, damaged, stolen, lost or wasted.

Responsibilities of employees:

- a. *Understand what information is confidential and cannot be shared with other stakeholders. This obligation extends to confidential information of third parties, which the Company has received under any agreements*
- b. *Proactively take actions to safeguard IP and confidential information of Endurance and our stakeholders when collecting, processing, storing and sharing it*
- c. *Seek authorization before disclosing confidential information to relevant stakeholders and ensure that they understand how to handle the information securely*
- d. *Disclose confidential information to relevant stakeholders only for legitimate “need to know” or “need to use” business purposes with a clear statement that the information is confidential*
- e. *Do not discuss confidential information where others can overhear the conversation (public places in company premises, public places outside the workplace including airports and while using public transportation)*
- f. *Do not print confidential information on unattended printers*
- g. *Drive self and team to ensure compliance of ISMS policies*
- h. *Collect personal information only for legitimate business purposes, store it only as long as it is necessary, and handle it securely*
- i. *Proactively take precautions to protect personal data when collecting, processing, storing and sharing it*
- j. *Use Endurance assets only for business purposes*
- k. *Ensure there is no theft, wastage, or inappropriate destruction of economic value while using Endurance assets*
- l. *Report any suspicious activity concerning theft of Endurance assets immediately to your supervisor and Corporate HR*
- m. *Do not post any details about Endurance or our stakeholders on professional networking sites, on any social media, or on any other medium*

II. Fair dealings with customers, vendor partners, third parties

At Endurance, we believe in dealing transparently, ethically, and professionally with our customers, vendor partners, business partners, and other stakeholders with whom we interact. We expect our employees not to make any wilful omissions or misrepresent facts which would compromise the integrity of Endurance’s values. We continuously strive to ensure that we are fair to all our stakeholders and that we do not take advantage of any stakeholder via manipulation or concealment of vital information.

Responsibilities of employees:

- a. *Verify the accuracy of data and ensure only facts are communicated with all stakeholders*
- b. *Do not misrepresent any data and misguide any stakeholder of Endurance*
- c. *Seek authorization and share the relevant information transparently with relevant stakeholders*
- d. *Proactively update stakeholders on the status of key initiatives, on any deviations from agreed plans, and delays in timelines*
- e. *Do not conceal gaps or mistakes and share action plans to correct them with relevant stakeholders*

D. Ensure proactive compliance management

I. Proactive compliance with all laws

Compliance with the highest standards of ethics and governance is non-negotiable at Endurance. We expect our employees not only to ensure compliance with all applicable laws, regulations, and guidelines but also to highlight

non-compliances of employees, business partners, vendor partners, and other stakeholders proactively. Any non-compliance puts Endurance's reputation at risk and exposes us to liability. Endurance will take necessary disciplinary actions for such violations and/or if these violations are not reported transparently.

Responsibilities of employees:

- a. Understand and acquire appropriate knowledge of all applicable governmental laws, statutes, rules and regulations relating to their duties to enable them fulfil compliance and recognize potential dangers of non-compliance, and to know when to seek legal advice*
- b. Understand and acquaint yourself with all policies, rules, regulations, SOA and SOPs laid down by the Company*
- c. Understand the periodic schedule of submissions and renewals*
- d. Verify the accuracy of data before submitting documents*
- e. Collaborate effectively with relevant internal stakeholders to ensure all documents are submitted before deadlines*
- f. Stay updated on relevant amendments and proactively share these revisions along with the impact of these amendments with relevant stakeholders*
- g. Proactively highlight any non-compliance of Endurance or key stakeholders to your supervisor and the legal team*

II. Prevent insider trading

All employees are aware that securities of Endurance are listed on stock exchanges in India and the Company has formulated a Code of Conduct for Prevention of Insider Trading (PIT Code) based on SEBI (Prevention of Insider Trading) Regulations. Employees agree not to use any unpublished price sensitive information they have access to or have possession of before the same has been communicated in public, to indulge in any form of insider trading nor assist others including family, friends, and business associates to derive any benefit, directly or indirectly, from such information. There is zero tolerance for employees who engage in such behaviour. The PIT Code is posted on the Company's e-Swagat portal as well as on its website. Designated Employees under the PIT Code are required to read, understand and comply with the said code and are also required to make necessary disclosures and declarations as specified therein.

Responsibilities of employees:

- a. Do not buy or sell Endurance stocks on the basis of price sensitive non-public information*
- b. Do not buy or sell Endurance stocks during notified blackout periods*
- c. Understand the PIT Code and ensure adherence*
- d. Do not share price sensitive non-public information with any employee/ stakeholder without formal authorization*
- e. Ensure any information shared with authorization is only for a legitimate "need to know" business purpose*
- f. Do not share any price sensitive non-public information of Endurance informally with family, friends, or any other third party*
- g. Report any unauthorized solicitation of price sensitive information*

Q&A

1. *I have observed that contract workmen are not adhering to Endurance's safety guidelines and are not following our procedures. Do I need to hold them accountable to Endurance standards?*
 - a. *Yes. We are responsible for any individual that enters our premises. All contractors/ individuals have to follow the same policies and procedures as well as additional requirements laid down by Endurance.*
2. *I have observed a few unsafe practices in my plant. I believe if I escalate this point, it might cause trouble. What should I do?*
 - a. *Raising a concern about safety is being responsible and proactive. You should speak with your Plant Head, EHS Head and corporate EHS team to discuss your concerns, understand whether there is a reasoning for the practises and determine actions to ensure the practises are discontinued if they lead to a safety risk.*
3. *I'm responsible for recruitment for a role which entails extensive travel. One of the candidates has the relevant experience and qualifications but is a female single parent. As a result, I feel such a situation would significantly hinder this candidate's ability to cope with the job requirement. Can I decide not to share this resume with the relevant stakeholders?*
 - a. *No. The ECOC clearly highlights that we should not discriminate against any individual and to make decisions based upon merit. We cannot make a presumption that the candidate would not be able to meet the travel requirements of the job. All eligible candidates should be provided with equal opportunity to demonstrate or justify that they can cope with the travel requirements of the job. Being a female single parent cannot be a ground to be discriminated against at any stage of recruitment or ongoing employment in our company.*
4. *During a Company event, a male colleague made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was "after hours". Is this incidence considered as harassment?*
 - a. *Yes. This unacceptable behaviour violates our POSH Policy and in turn violates the ECOC which cannot be tolerated. You should report this to the respective Internal Complaints Committee immediately.*
5. *I learnt that my colleague has been accused of sexual harassment and that an investigation is being initiated. Is it acceptable if I give my friend an advance warning/ heads up to defend himself?*
 - a. *No. Your colleague/ friend will be given a fair opportunity to respond to the allegations and necessary actions will be taken to ensure an unbiased investigation. A POSH allegation is a serious matter and giving an advance warning can jeopardize the investigation and expose Endurance to additional risks.*
6. *My Plant Head wants me to cancel the procurement of essential safety equipment as this will pull down the quarterly financial results. Can I do so?*
 - a. *No. We have a zero tolerance for EHS violations. Hence this has to be reported to the Cluster Business Head and Management Committee members concerned immediately.*
7. *In meetings, my supervisor often hides information by switching to a regional language only understood by few team members. Despite requests to speak in commonly understood languages, he continues speaking in the regional language during meetings. Can I escalate this?*

- a. *Yes, it is important that you highlight this behaviour to your Function Head, Plant Head, CBU Head or respective MC member*
8. *I believe there is a separate Code of Conduct for Directors and Senior Management Personnel (SMP). Are SMP not required to adhere to the ECOC?*
 - a. *All employees are expected to adhere to the ECOC. SMP have to adhere to the Code of Conduct for Directors and SMP in addition to the ECOC.*
9. *Is it acceptable to violate ECOC in order to meet goals for my department/ plant/ business unit?*
 - a. *No. Endurance focuses on fostering a high performance culture while setting aggressive and challenging goals. While we expect employees to strive to achieve them, you should never violate ECOC or any policy of Endurance to achieve goals.*
10. *I have constraints of taking actions against a few of my team members as they are high performers. Is my stand fair?*
 - a. *No. We have a zero tolerance for any employee who has violated our code of conduct or demonstrated unethical behaviour, regardless of their performance. We cannot compromise on integrity. It is non-negotiable.*
11. *I am often in conflict on how I can demonstrate our values of transparency and integrity simultaneously. Please can you share how I can live these values simultaneously?*
 - a. *Transparency and integrity are our core values. It is important that you gain clarity on information which should be shared with relevant stakeholders and information that should be safeguarded. We expect you to be sincere, ethical, and open in all your actions. Please speak to your supervisor/ senior management for any clarification.*
12. *At the end of the last quarter of reporting period, my manager asked me to record additional expenses even though I had not yet received the invoices from the supplier and the work had not yet started. I agreed to do it, mostly because I didn't think it really made a difference since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.*
 - a. *No, you did not do the right thing. Costs must be recorded in the period in which they are incurred. The work had not started, and the costs had not been incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.*
13. *I'm responsible for selecting vendors for a new product vertical. One of my relatives holds a senior position in one of the companies we are evaluating. Can I appoint the company where my relative works if the company meets Endurance's requirements?*
 - a. *Since there is a clear conflict of interest, we expect that you immediately disclose this information to your supervisor and Chief Sourcing Officer of the Company. Given the conflict of interest, your judgement may be influenced. As a result, the evaluation of suppliers should be conducted by your colleague or supervisor to ensure an objective decision.*
14. *After a long day at work, I want to relax with some alcohol. I'm currently in an outstation location and staying at the guest house. Can I consume alcohol since it is "after work hours"?*
 - a. *No, the ECOC clearly states that the consumption of alcohol is prohibited in Company premises which includes the guest house of the Company.*

15. *A vendor partner has sent me a chocolate gift basket for Diwali. Can I accept it?*
- As long as you believe you will continue to remain objective and not feel obligated or influenced by the Diwali gift basket, you can accept it. You are encouraged to share the chocolates with other employees in your plant/ department. In a year, you are allowed to accept sweets/ mementos of a value of maximum Rs. 5000 from a vendor/ customer/ service provider/ any other stakeholder. In case you have a doubt that the cost of the gift might exceed Rs. 5000, please do not accept it.*
16. *A vendor partner has offered to take me out for dinner. Can I accept the offer?*
- No. It is a violation of ECOC if you allow vendor partners, or other external stakeholders to take you out for a meal.*
17. *I have received an offer to paint a few sceneries for a school library for which I would receive compensation. I plan to undertake this activity during Sundays. Can I accept this offer?*
- It is a violation of ECOC if any employee seeks outside employment or if he/ she starts a business venture. Given this a hobby, you should make a disclosure to your supervisor and respective MC member and get their approval before taking up this activity. It is your responsibility to share any change in this situation.*
18. *I'm aware of a violation of ECOC. Should I report it to my supervisor?*
- Yes. It is your duty and responsibility to highlight breaches of ethical values.*
19. *I have reported a non-compliance to my supervisor but he has taken no action. Is it my responsibility to escalate and report the non-compliance to senior management?*
- Yes. It is your duty to highlight non-compliances even when your supervisor has taken no action.*
20. *If I am aware of a violation of ECOC involving a member of senior management, is it my responsibility to report the incident?*
- Yes. ECOC applies to all employees equally. Regardless of who the allegation involves, you must report the incident to the concerned stakeholders without exception.*
21. *I am unable to complete my deliverables in the office and I will miss the deadline if I do not work from home. I do not have access to the Endurance mail at home. Is it acceptable for me to forward the documents I'm working on to my personal email to meet my deadline?*
- No. You cannot forward any Endurance information or any information of Endurance's stakeholders to your personal email.*
22. *I have access to personal information of other employees. Do I need to maintain confidentiality of this information?*
- Any information relating directly or indirectly to an identifiable person needs to be protected. We have a responsibility to protect this personal information of our fellow employees. For further information, please refer to our Data Privacy and Protection Policy or contact our Data Protection Officer.*

23. *I'm a member of an EHS group on WhatsApp with other EHS practitioners including competitors. The administrator of the group has requested for an informal call/ in person meeting to discuss EHS compliance strategy from an industry perspective. Can I speak to the administrator informally?*
- a. *You should immediately decline to participate in a call/ in person meeting if you believe the administrator will ask details regarding ETL processes and EHS practices. No information on Endurance should be divulged on the group or informally. Sharing Company data is prohibited. You should also report this incident to your supervisor and the legal department.*
24. *I attended a customer meeting where my colleague made an untruthful statement about Endurance. What should I do?*
- a. *You should correct the inaccuracy during the meeting to ensure only facts are communicated. If this is not possible, please speak to your colleague immediately after the meeting and ensure he/she/ Endurance corrects any misrepresentation made to the customer.*
25. *Endurance has recently announced the launch of a new business vertical. My friend is a journalist with a leading magazine and has asked me to provide some information that he could use for an article. He has assured me that he will not reveal the source. Can I share non price sensitive information with him?*
- a. *No, you should not share any information even if you have assurance that the source would remain anonymous. Only authorized personnel are permitted to speak to media.*
26. *Am I allowed to share a post on Endurance on my personal social media page?*
- a. *No. We need to ensure any information concerning Endurance should be truthful and not violate our commitment to external stakeholders.*
27. *I have access to Endurance's customer database. My friend is starting a business venture and has requested me to share data points from this database for his business. He has assured me that he will keep the data and source confidential. Can I share this data?*
- a. *No. You need to respect and safeguard customer data and not share this data.*
28. *I'm responsible for strategic sourcing of components and have tight budget targets for a Value Analysis and Value Engineering (VA/VE) project that I'm working on. In order to complete the project within the targeted costs, I requested our vendor partner to provide us an exceptional discount on this project order on the understanding that I would "make it up to him" in future orders. Would I be violating the ECOC?*
- a. *Yes. You are providing a commitment without an approval from senior management.*
29. *While having a conversation with me, my friend enquires about the financial performance of Endurance. I have access to financials which have not been published. Can I share approximate figures with him?*
- a. *No. You are not permitted to share unpublished financials of Endurance. Sharing of any price sensitive information that is not available with the public could also lead to violation of insider trading laws.*
30. *Are subcontractors/ contract labor expected to follow the same EHS policies & procedures as employees?*
- a. *Yes. The plant/ department teams are responsible for ensuring that contract labour, subcontractors or other stakeholders working at our premises understand and comply with all applicable laws, statutory compliances and regulations as well as with additional requirements that Endurance imposes.*

Compliance with Endurance Code of Conduct (ECOC) and consequence of violation

It is the responsibility of every employee to help enforce and implement this ECOC. In the event any employee is not comfortable reporting any violation of this ECOC directly to Corporate HR Team, he/she can use the Whistle Blower mechanism to report violations. The Company has formulated a Whistle Blower Policy which is available on the website and intranet (e-Swagat) of the Company.

The Head –Human Resources has the responsibility to ensure compliance of this ECOC. Any deviation/ complaint should be brought to the notice of the Head –Human Resources who will place it before the Managing Director/ Board for necessary action(s). We expect all employees to read and understand this ECOC and to sign the acknowledgment form at the end of this code (as per the format enclosed as Annexure A) and return the form to the Head –Human Resources indicating that they have received, read and understood, and agreed to imbibe and comply with this ECOC in day to day activities. Employees shall affirm compliance with this ECOC at the end of each financial year (as per the format enclosed as Annexure B).

There shall be a disciplinary committee or committees formed by the Company for conducting inquiries into alleged cases of violation of ECOC. The inquiry report will be submitted to the Head-Human Resources who will discuss the same with the respective Management Committee members and take appropriate action(s) in consultation with and approval of the Managing Director.

Accountability and discipline

Compliance with ECOC, Company's policies and applicable laws is non-negotiable. Endurance takes violations seriously and will take strict disciplinary actions including termination of employment depending on the nature and severity of the violation.

Following behaviour will lead to disciplinary actions:

- *Violating applicable laws, ECOC, all Company policies, SOA, SOPs or service conditions*
- *Influencing others to violate applicable laws, ECOC, company policies or procedures*
- *Failing to report fraud, suspicions of fraud, or any violation you are aware about (refer to our Whistleblower policy and Fraud Prevention & Detection Policy)*
- *Retaliating, discriminating, harassing, victimizing or engaging in any other unfair employment practice against any individual who has reported violations or has cooperated in an investigation*
- *Demonstrating reluctance to cooperate in company investigations/ audits*
- *Failing to effectively monitor actions of direct reportees*
- *Disclosing information of an internal investigation*

Amendments

The Company reserves its right to amend or modify this ECOC in whole or in part, at any time without assigning any reason whatsoever. The ECOC document shall be reviewed at least every two years to determine whether revisions may be required due to changes in regulations or in our business environment. The Company shall inform the employees of amendments/ modifications carried out to this ECOC and the employees shall be bound by such amendments/ modifications to this ECOC.

ANNEXURE A

ACKNOWLEDGMENT OF RECEIPT OF ECOC FOR EMPLOYEES

I have received and read the Endurance Code of Conduct (ECOC) for employees. I understand the values, standards and policies articulated in the code. I agree to manifest the ECOC in all my actions and decisions. I understand that there may be additional policies, SOPs or laws specific to my role.

If I have questions concerning the meaning or application of the code, any Company Policies, or the legal and regulatory requirements applicable to my job, I understand I can consult Head- Human Resources and that my questions or reports to these sources will be maintained in confidence.

Name of Employee:

Signature:

Date:

Please sign and return this form to Head – Human Resources.

ANNEXURE B

ANNUAL DECLARATION FORM ON ECOC COMPLIANCE BY EMPLOYEES

Head –Human Resources,

Endurance Technologies Limited,

L6, MID C Industrial Area,

Waluj, Aurangabad- 431 136.

Sir,

I, _____ (here mention the name and designation) of Endurance Technologies Limited, solemnly and sincerely affirm that I have adhered to the provisions of Endurance Code of Conduct of the Company (ECOC) for employees for the financial year ended 31st March, ____.

Thanks,

Name of Employee:

Signature:

Date:

Please sign and return this form to Head – Human Resources.