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OBJECTIVES

Macrotech Developers Limited and its subsidiaries (“**We, “us” or “the Company”**”) are committed to good corporate governance and upholding the best interest of its associates, clients and stakeholders. In its endeavour to excel as a company that believes in an exemplary work environment and social conduct, we expect all our associates, consultants and directors to display the highest standards of professional conduct in adherence to this code of conduct (“**Code**”).

Our excellence and success as a business entity comes from an efficient integration of quality products, effective processes and exceptional people. The core values that characterize our associates and underpin the way we do business are: - forthright, exceptional, customer-centric, economic value creators, nimble, learning-focused, empowered, meritocratic and collaborative. These core values are embedded in this Code with the objective of equipping every associate with the knowledge and ability to make the right decision when found at an ethical crossroad. This Code is not solely meant to be a set of prescriptive compliance guidelines but something that should be inculcated as part of every associate’s commitment to maintain the highest ethical standards and to discharge their moral responsibility towards the Company by ensuring that business relationships are fostered based on trust, transparency and accountability.

Without prejudice to the generality of this Code, it is to be noted that this Code is not an exhaustive statement of the professional and ethical standards expected from the associates. In addition to the situations envisaged and mentioned in this Code, the management of the Company shall retain exclusive discretion on identifying any action/inaction as wrongful conduct and mandate appropriate disciplinary action accordingly.

For the purposes of this Code, reference to the term ‘associate’ shall be construed to mean and include a reference to associates, consultants and the directors of the Company..


This Code sets out how we behave with our associates, those who work with us, our customers, the communities and the environment in which we operate, our value-chain partners, our joint-venture partners or other business associates, our financial and other stakeholders.

GENERAL CONDUCT

As part of a prestigious Company, our associates must at all times conduct the Company’s business with utmost professionalism, seek to engender a culture of compliance and avoid any action which is likely to bring disrepute to the Company. In furtherance thereof, the following basic principles should be adhered to:

1. Avoiding conflicts and misuse of position

Associates should avoid any conflict between their own personal interests and that of the Company and strive to ensure that no undue or unethical advantage is taken by virtue of their position in the Company. Associates are expected to refrain from personal activities or interests while at work and conduct their daily jobs with professionalism, integrity and honesty.


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Associates shall always act in the best interest of the Company and shall ensure that any business or personal association including close personal relationships (eg spouse / partner, dependent children and other close relatives), which they may have do not create a conflict of interest with their roles and duties in the Company or the operations of the Company. An associate shall not misuse his/her position in the Company for personal gain.

Associates should not engage in any business, financial or otherwise, outside their job and are required to obtain prior permission before taking up any activity which would require their involvement during work hours or for which they will receive remuneration. Associates must ensure that any such assignment does not adversely affect their work or detrimentally conflict with the interest of the Company.

Examples of conflicts of interest for Associates:


- a. Engaging in a business, activity or relationship with anyone who is party to a transaction with the Company;
 - b. Deriving an improper benefit, personally or for any family member or for any person in a close personal relationship, by making or influencing decisions relating to any transaction because of his position in the Company;
 - c. Using his position in the Company to influence decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative or a person in close personal relationship employed in the Company /group companies;
 - d. Undertaking an activity by which the interest of the Company or group companies can be compromised or defeated; or
 - e. Doing anything by which an independent judgment of the Company’s or group companies’ best interest cannot be exercised
2. Selection and promotion of associates shall be on the basis of their qualifications and merit, without discrimination or concern for race, religion, caste, place of birth, nationality, ethnicity, colour, sex, sexual orientation, age or disability.
 3. Possessing, using or distributing illegal drugs, abusive substances or weapons within the premises of the Company is not allowed. No associate shall report to work under the influence of drugs or alcohol or any other abusive substance.
 4. No associate shall create, display or publish work which contains statements, suggestions or images offensive to general public decency.
 5. All associates shall adhere to the applicable laws, rules and regulations including accounting and auditing standards. For this purpose, the associates shall also:
 - a. co-operate to ensure that the Company adheres to appropriate accounting and auditing standards;
 - b. comply with accurate collection and upkeep of required supporting documentation for all

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financial transactions in connection with the Company, including but not limited to vendor invoices, tax receipts etc.;

- c. Ensure that the Company’s auditors (as well as independent auditors) receive the full cooperation of all associates. Falsifying records of the Company will result in immediate dismissal and other legal actions.
6. Associates should refrain from doing anything which might discredit or bring disrepute to the Company (even though it might not be unlawful) in the Company’s premises or in any clients /customer’s premises or in any public places.
7. Any intellectual property, developed or otherwise acquired by Company is the property of the Company. Associates with access to intellectual property shall not improperly disclose or use the intellectual property either during or after employment with the Company without prior permission from the Company. Associates understand that any intellectual property developed by them in course of their employment with the Company will at all times belong to the Company and the associate shall not claim any rights on the same whatsoever. Associates are prohibited from facilitating thereproduction, display, distribution of any material that infringes the Company’s or any other third party’s intellectual property rights. For the purposes of this paragraph the term ‘intellectual property rights’ shall include without limitation, the rights comprised in any patent, copyright, compilation of data, industrial design, trademarks, trade secrets, know- how, or other form of rights generally understood as intellectual property, whether at common law or by statute or convention, rights to apply for registration under a statute in respect of those or like rights.
8. **Fraud**
Fraud by act or conduct is deliberate concealment of what ought to have been disclosed or misrepresentation of a fact to deceive or cheat to obtain an advantage or cause loss or damage to the Company. As an Associate, you must:
 - a. Be honest in all your dealings with the Company and Business Associates.
 - b. Not provide incorrect data / information or conceal relevant data / information
 - c. Not appropriate Company property, funds or any item of value that belongs to the Company nor claim reimbursements that you are not entitled
 - d. Not alter or forge cheques, financial records or Company data
 - e. Report promptly any instance of fraud or threat of fraud to your direct reporting manager or the internal audit department
9. **Political contributions & Charitable donations**
Political contributions include any contribution, made in cash or kind, to support a political cause, party, candidate or issue. Political contributions to political parties, companies or individuals engaged in politics should not be made for the purpose of obtaining advantage in business transactions.

Any political contribution made on behalf of the Company would be considered appropriate if it is not made for obtaining business advantage, is in accordance with local applicable laws and regulations on political contributions and has been made as per delegation matrix duly approved by the board of the company. All such relevant expenditure should be fully

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documented, recorded in the Company's records and publicly declared wherever required.

Any charitable donation made on behalf of the Company would be considered appropriate if it is permissible under the applicable local laws and regulations, is made for a philanthropic cause and not for obtaining any business advantage and after approving necessary approvals. Any such donations made towards charitable causes should be accurately recorded in the Company's book of accounts.

10. Political and Religious Affiliations

The Company respects the right of every associate to have political and religious beliefs and affiliations that are legal and permitted by law. However, all political and religious issues are personal in nature and cannot be done during office hours, on office premises or involve office colleagues.

You must not:


- a. Use the Company's time, money or resources to support or encourage political activities
- b. Solicit contributions for any religious or political activity or conduct any such activity in the office premises. However, offices may celebrate a few well known festivals like Christmas, Diwali etc. or in which all associates are invited to participate
- c. Contribute company funds for any political purpose without authority from the board
- d. Seek public elected office without prior permission
- e. Undertake or participate in any political or religious propaganda within the office premises
- f. Join or be a member of any banned or extremist outfit

11. Government / Government agencies

We shall act in accordance with the constitution and governance systems of the country. We do not support any specific political party or candidate for political office. Our conduct must preclude any act that could be interpreted as mutual dependence/favour 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.

While dealing with Government agencies, you must:

- a. Ensure that the highest standards of business conduct are followed
- b. Contact or engage with the relevant government agency only if authorized to do so on behalf of the company
- c. If in doubt, escalate the matter to your seniors, do not attempt to resolve on your own
- d. When seeking resolution or clarification of various legal issues, ensure all engagements are in line with normal business conduct and based on merit
- e. Do not attempt to exert undue influence to obtain a favourable decision
- f. Knowingly destroy, alter, conceal any records or data in physical/ electronic form
- g. Obstruct directly or otherwise access to information or records that are sought
- h. Provide false or misleading information or create false data or records

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ADHERENCE TO THE COMPANY’S POLICIES:

In order to be compliant with this Code, it is imperative for each and every associate to abide by the policies of the Company and make reference to the same as and when required. The Company will communicate the Code of Conduct policy to all the new joiners during induction and also conduct annual training programs for all the associates and full time consultants. Given below are references to some of the key Company policies which must be complied and read in conjunction with this Code:


1. **Prevention of Personal and/or Sexual Harassment at the Workplace Policy:** The Company strives to provide a safe and civilized workplace to all its associates. Sexual or personal harassment, discrimination or offensive behaviour of any kind is prohibited. For any further details or clarification in this regard, reference may be made to the policy on Prevention of Personal and/or Sexual Harassment at the Workplace.

2. **Equal Employment Opportunity Policy:** The Company provides equal employment opportunities and does not discriminate directly or indirectly against any associate or job applicant on any grounds including race, age, colour, physical ability, ethnic origin, nationality, religion, gender, family status, marital status, pre-natal status, gender re- assignment, disability status, genetic information or sexual orientation.

3. **Information Security Policy:** The Company respects the privacy of all individuals and takes all precautions mandated by law to protect and secure personal data. All associates must comply with privacy and data security laws as applicable to the Company especially when handling personal information, e-mails and business data including the data of customers/clients collected in the course of conducting business. Associates shall comply with data protection regulations and actively contribute to ensuring that confidential data, especially business data is secured against unauthorized third-party access. Further, associates shall maintain complete and accurate Company records in accordance with the Company’s data retention and other data management processes and associates should be committed to maintain, archive and if applicable, destroy records of the Company in compliance with the legal and regulatory record keeping requirements.

4. **Transparency & Ethics Policy:** The Company reinforces the belief system in doing things ethically and without taking any undue advantage of any relationship. It also ensures a clean and transparent work environment for conducting business. For any further details or clarification in this regard, reference may be made to the Transparency & Ethics Policy.

5. **IT Assets Management Policy:** Use of the Company’s property like computers, networking resources, electronic communication system including e-mail and telephone and any other property provided to facilitate business related communication shall be used by associates only for business purposes. All associates are expected to keep operational and business documents strictly confidential. For any further details or clarification in this regard, reference may be made to the IT Assets Management Policy.


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6. **Corporate Communications Policy:** The Company has internal processes in place to make full, fair, accurate, timely and understandable disclosures to regulators, government agencies, investors and the general public. Addressing any media queries should be treated as a very sensitive matter and only the management team and the designated spokespersons are authorized to interact with the media. Associates are requested to strictly refrain from entertaining media queries or interactions (including off the record statements) under any circumstances. Associates are expected to not manipulate or misrepresent any facts relating to the Company and should always redirect requests for representing our Company to authorized representatives of corporate communications. All dealings with financial stakeholders and investors will be through the investor relations department. For any further details or clarification in this regard, reference may be made to the Corporate Communications Policy.
7. **Anti Money Laundering, Anti Bribery and Anti Corruption Policy:** The Company is committed to complying fully with all applicable Anti-Money Laundering and Anti-Bribery and Anti-Corruption laws in the conduct of its business. It is also committed to the prevention, deterrence and detection of bribery and other corrupt business practices which extends to implementing and enforcing effective systems to counter bribery and corruption. For any further details or clarifications in this regard, reference may be made to the Anti-Money Laundering, Anti-Bribery and Anti-Corruption Policy.

Insider Trading Code: The Company is committed to preserving the confidentiality and preventing the misuse of the Company’s confidential, price sensitive information by trading in the company’s listed securities directly or indirectly through friends, relatives or contacts and adherence to all applicable laws and regulations with regards to prevention of insider trading. The Company has adopted a Code of Conduct for regulating, monitoring and reporting of trading in the securities of the Company by Designated Persons and their relatives and connected persons.

Associates shall seek proper authorisation prior to disclosing unpublished, price sensitive information and such disclosures shall be made in accordance with the Company’s Insider Trading Policy. Please refer to the Company’s Insider Trading Policy Code for further guidance.

8. **Substance Abuse Policy:** The Company will not tolerate substance abuse or the use of any substance which imperils/impedes the health and wellbeing of its associates or threatens the service to the public and places other associates at risk. It ensures that all associates have a right to work in an environment which is free from substance abuse and with the persons free from the effects of drugs or alcohol abuse.
9. **Human Rights Policy:** The Company is committed to adhering to internationally recognized human rights and provides a framework for how the Company will uphold these human rights within its operations and throughout its value chain. The Company recognizes that every person has the right to live a life that is free from fear, harassment and discrimination, and that everyone is entitled to a universal set of human rights. We are committed to respect and support human rights in accordance with the Indian Constitution & applicable labour laws and international standards such as those enumerated in the United Nations Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights and the International Labour

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Company's Declaration on Fundamental Principles and Rights at Work.

10. **Whistle Blower Policy:**

The Whistleblower Policy aims to provide a mechanism to ensure that concerns under this Code are properly raised, appropriately investigated and addressed and to provide avenues for Director, associates and other stakeholders and their representative bodies to raise concerns regarding illegal or unethical practices or violations, easily and free of any fear of retaliation or victimization. For any further details or clarification in this regard, reference may be made to the Whistleblower Policy.

ENVIRONMENT, HEALTH & SAFETY

The Company is committed to maintaining a safe, secure and healthy work place. As a responsible corporate citizen, it promotes clean and green energy initiatives to ensure a sustainable environment and will endeavour to take steps necessary to reduce energy consumption and waste.

It is the individual responsibility of each associate to:

- Maintain a clean and organized work space with no obstacles or potential hazards to himself or others
- Switch off all lights and other appliances like printers, computers and photo copiers in the work space when leaving office
- Observe safety rules and measures while driving, at home and at all times.
- Follow company's policies and procedures for a safe and healthy work place
- Comply with any travel restrictions that may be notified like temporary unsafe places, ladies travelling late at night etc
- Familiarize yourself with practice sessions like fire and emergency alarm drills and comply promptly with instructions when faced with an actual situations
- Be environmentally conscious and comply with laws and regulations on environment that may apply to the specific job profile
- Report any unsafe or illegal activity that may jeopardize the safety of others at the work place.


COMPLIANCE WITH LAWS AND REGULATIONS

The Company subscribes to upholding the highest standards of fair and ethical business practices and market driven competition and acknowledges that while competing aggressively, the nature of the industry also needs collaboration but within the framework of applicable laws. Compliance with all applicable laws and regulations is an absolute must and non-negotiable. The Company has a zero tolerance policy for breach of regulations and rules and expects every associate not only to be fully aware of all applicable laws but also to comply with the same in letter and spirit.

You have a duty to report to the legal department any alleged instance or incident of breach and consult them when in doubt about a practice or arrangement being a permitted activity. Compliance with the anti- trust law is a legal requirement and any breach may have serious penal and reputational consequences for the Company.

As an associate you must not:

- Directly deal with, contact or engage with competitors that may create a potential conflict with the provisions of competition law

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- Share or part with company specific information in an industry forum or enter into agreements with competitors on any matter unless you have consulted with the legal department in advance
- Enter into agreements that may be construed as abuse of dominance or restrictive trade practices such as price fixation, exclusive tie in arrangements, limiting the supply of goods or services, collusive bid rigging or predatory pricing

As an associate you must:

- Ensure that you understand the implications of the laws that are applicable to your area of work
- Be compliant with the laws and applicable regulations
- Notify the ombudsman of any threatened or actual breach
- Inform value chain partners of the Company’s policy on compliance

CONFIDENTIALITY AND NON-DISCLOSURE

1. Information about the Company’s business shall be clearly and accurately communicated to stakeholders in a non-discriminatory manner in accordance with the applicable law. Associates should exercise prudence and not misuse the information and communication systems of the Company in a manner that is detrimental to the Company.
2. Any confidential information of the Company is of vital importance in maintaining the Company’s competitive advantage, introduce new product offerings and create valuable assets for future diversification and growth. Associates shall respect and protect all confidential information and intellectual property of the Company and shall not manipulate or misrepresent any facts relating to the Company.
3. Any proprietary or non-public information about the Company, known to the associates should not be disclosed to any third party including any prospective employer(s) of the associate. Associates shall consult their reporting managers prior to sharing any information that could be confidential and seek the counsel of the legal department to ascertain whether a confidentiality and a non-disclosure agreement needs to be entered into in this regard.
4. In case any confidential information of the Company is required to be disseminated under applicable laws or by Governmental order, due approval of the management must be sought.
5. For the purposes of these preceding paragraphs, ‘confidential information’ shall mean and include without limitation, the rights comprised in any intellectual property rights, methods, procedures, plans and strategies, and information relating to customers, business plans, proposed acquisitions, promotional and marketing activities, sales and customer information, financial information, business forecast, technology, manufacturing processes, research developments, personnel training technique and materials, designs, inventions and

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engineering concepts, and any other business affairs of the Company, as well as any and all copies, notes, summaries, analyses, compilations, studies, reports and other documents or data and/or information, in whatever form or medium, generated by the Recipient or its representatives that contains, reflects, or is derived, in whole or in part, from the data and/or information furnished by the Company or any of its representatives or on its or their behalf. In addition, Confidential Information shall include all information that the Recipient may obtain by walk-through examination of any of the Company’s premises.

6. Associates shall not make any wilful omissions or material misrepresentation that would compromise the integrity of the Company’s records, internal or external communications and reports, including the financial statements.
7. Social media, chat rooms or blogs should not be used at any time to discuss matters relating to company matters or policy; this is strictly prohibited. Do not post on a social networking site or give to the media (whether on or off record) any casual comments that may be mistaken or imply endorsement of the same by the Company.

MISCONDUCT:

Set out hereunder is an indicative list of acts that would constitute misconduct for the purposes of this Code. The below-mentioned list is only indicative and the Company reserves the right to initiate action against the associate including termination of service if any other instance not expressly mentioned below but would generally be regarded as misconduct are reported against any associate.

1. Insubordination or disobedience, whether alone or in combination with others, mobilizing strikes at work or inciting others to strike at work in contravention of the provisions of applicable law, or contract;
2. Wilful slowing down in the performance of work, or abetment or instigation thereof;
3. Theft, fraud, embezzlement, dishonesty or misappropriation in connection with the Company’s business or property;
4. Taking, giving or offering bribes, kickbacks, privileges, undue fees or gratuity directly or indirectly to or from client / business partner / government or regulatory officials;
5. Misuse of the assets of the Company for personal or unauthorized purposes;
6. Habitual absence without sanctioned leave;
7. Overstaying sanctioned leave for more than seven days without sufficient grounds or proper or satisfactory explanation;
8. Habitual or frequent late attendance and disregarding the core working hours of the Company;
9. Breach of the Company’s policies or rules and regulations or any applicable law, or committing any act in public which lowers the image of the Company;
10. Unauthorized interaction in connection with the Company’s business or property;
11. Seeking loans from the Company’s clients or suppliers;
12. Giving or taking loans from associates;
13. Drunkenness, intoxication, riotous, disorderly or indecent behaviour or indulgence in

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abusive language;


14. Commission of any acts detrimental to discipline / good behaviour;
15. Habitual negligence or neglect of work;
16. Wilful damage to work in progress or to any property of the Company or its clients;
17. Holding or aiding or abetting unauthorized meetings during office hours or in the office premises;
18. Gambling in the office premises or indulgence in unlawful speculation in office premises;
19. Working, without permission, in or outside office hours, on work similar or competitive to that undertaken by the Company;
20. Accepting outside or other salaried employment;
21. Involvement in criminal offence, or offences involving moral turpitude;
22. Refusal to accept charge sheet order or other communication intended for service on any associate in accordance with this Code and other policies of the Company;
23. Breach of trust or confidence;
24. Violation of Company's intellectual property rights including but not limited to patent, copyright, design, trademark, trade secret etc. in respect of any software, hardware, product, website etc. used during the course of employment;
25. Irresponsible behaviour / loose comments on social media attracting negative publicity for the Company;
26. Use of foul language;
27. Display of explicit or offensive calendars, posters, pictures, drawings or cartoons that reflect negatively upon a person's character;
28. Teasing or references to an associate's age or disability;
29. Victimization of an associate based on the above and/or personal bias/dislike.

Notwithstanding the above, involvement or abetment in connection to the following will render the concerned associate to immediate termination (without notice period or pay):

1. Terrorism;
2. Murder;
3. Extortion;
4. Rape;
5. Kidnapping;
6. Prostitution (involvement/usage);
7. Illegal betting; and
8. Any other activity of a similar nature as ratified by the management of the Company.

NON-COMPLIANCE WITH THE CODE OF CONDUCT

The Company is committed to conducting its business and operations in a legally compliant manner and ensuring compliance with all the Company policies, procedures and internal controls. Instances of non-compliance may impact and adversely affect the Company's brand, reputation and market value. The Company will seek an acknowledgement and affirmation from all parties to whom this policy is applicable including the senior management and Directors on an annual basis. Any associate of any entity forming part of the Company, who violates the standards contained in this Code will be subject to disciplinary action up to and including dismissal and if applicable, to criminal and civil proceedings. Associates are expected to co-operate in all investigations on integrity, ethical or

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policy violation matters.

REPORTING BREACHES OF THE CODE OF CONDUCT

Associates and other stakeholders may raise concerns when they become aware of any actual or potential violation of this Code, policies or law or any event of misconduct which is not reflective of our values and principles. Avenues available for raising concerns include:

- a. For Associates – Immediate line manager or the Human Resources department or the Chief Ethics Officer of the Company
- b. For all Stakeholders including Associates -
 - Through dedicated secure telephone line 96199 93643
 - Through email at lodhaombudsman@gmail.com
 - In writing to:

The Ombudsman
Macrotech Developers Limited,
Lodha Excelus, L 2, N M Joshi Marg,
Mahalaxmi, Mumbai 400 011
 - Through other reporting channels set out in the Whistleblower Policy

MONITORING AND REVIEW

The primary responsibility of implementing this policy is with the Head Human Resources who will also monitor effectiveness and review implementation of this Code and reserves the right to amend it from time to time.
