



# CODE OF CONDUCT

MEHTA EXCEL



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## WHAT WE STAND FOR

### Our Vision

To create a world-class tailored logistics services that support India's economic development and maximize stakeholder returns.

### Our Mission

To help businesses across all verticals achieve their revenue goals by providing superior value-added solutions in technology and service. To become the first choice as business partner, employer, and investor.

### Our Values

To be the most preferred partner, by emphasizing on our values:

**Integrity:** To be accountable at an individual and organisational level, governed by the highest ethical and compliance standards.

**Commitment:** To create a service environment that achieves the highest levels of customer satisfaction.

**Innovation:** To strive for superior solutions aided by technology and create innovative services that will create limitless success.

# CODE OF CONDUCT

## What is the code of conduct?

The code of conduct is an explanation of the Mehta Excel Principles of Conduct and Action and sets out what is expected of the employees. The objective of the Code is to ensure that every employee in India is aware of appropriate conduct and ethical behaviour, in harmoniousness with the Mehta Excel Principles of Conduct and Action.



### Applicability

The Code applies to all employees of the Mehta Excel in India including trainees and temporary staff.

### Code

Mehta Excel believes in conducting its affairs in a fair and transparent manner by embracing the highest standards of professionalism, honesty, integrity, and ethical behaviour. All employees of Mehta Excel are expected to strictly adhere to this code of conduct.

### General Standards of Conduct

We expect all our employees to conduct their business dealings with honesty, openly, fairly, diligently, and courteously and in a manner that increases the image of the Company. All employees should be aware of all policies and processes applicable to the Company and fully abide by them. While policies and procedures could be questioned, it should happen through applicable forums responsible for review of policies and until any such change happens, no person should violate the existing policy / procedure.

# INCLUSIVE

## Diversity and Inclusion

We are building an establishment that is known for its diverse and inclusive culture, where all individuals feel valued, are engaged constructively, and contribute as a collective, to the Company's success. It is our company belief that diversity and inclusion contribute to our company's success. The main reasons for employee selection and promotion are skills and qualifications. We expressly reject any form of discrimination based on gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation and identity or any other characteristic protected by law. All of us are called on to contribute to an environment of respect that prevents any kind of harassment, including workplace bullying, unwelcome sexual advances, unwanted physical contact, inappropriate propositions, or a working environment tainted by insulting jokes and remarks or demeaning comments. We do not tolerate any kind of violence in the workplace, including but not limited to threatening and intimidating behaviour.

## Collaboration

We make the most of each other's strengths, keeping personal differences aside to ensure that we manage internal and external stakeholders as a unit. In all our action, we give precedence to the needs and priorities of various internal stakeholders that are directly and indirectly involved in our scope of work.

Creating consistent value for our customers, involves a service mindset towards our internal stakeholders coupled with empathy and understanding. We work with vendors and business partners closely involved with our operations to ensure that they can serve our business operations optimally.

## Culture of Dignity

The Company respects the rights and dignity of all employees. We aim to establish clear values and objectives so that all employees understand and are committed to the aims of the Company and clearly see their roles within it. We will seek to create a challenging environment of empowerment and continuous learning, to recognize individual and team contributions, and to reward competitively, relative to performance.

It is expected that all employees in the Company treat the people they interact with, both within and outside the Company, with respect and in a manner that their self-esteem and dignity are always maintained.



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**Integrity gives you real freedom  
because you have nothing to fear  
since you have nothing to hide**

ZIG ZIGLAR

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## Conflict of Interest

We expect you to maintain high ethical standards in dealing with conflicts of interest. A conflict of interest exists if your private activities or relationships could, or could appear to, result in you no longer being able to perform your duties for Mehta Excel independently and objectively. Relationships that could lead to a conflict of interest include family ties, partnerships with business partners and competitors, or shares or investments in their companies.

# INTEGRITY

The term “conflict of interest” describes any circumstances that could cast doubt on our ability to act with total objectivity regarding the Company's interests.

1

No employee will be involved in any arrangement or circumstances, including family or other personal relationships, which might discourage him/her from acting in the best interest of the Group/Company.

2

No employee or his/her family member will act as a broker or on behalf of a third party in transactions involving or potentially involving his/her company.

3

Employees or their family members will not have any financial interest in any outside enterprise which is currently doing business or seeks to do business with or is a competitor of his/her Company. If the employee comes to know that his/her Company is doing business with any organisation or individual with which he/she is directly or indirectly involved for example, through a relative he/she is obliged to bring it to the notice of his manager or Head-HR through a written letter/ mail.

4

An employee should not be the final decision maker for any business contract or arrangement with any organisation wherein his/her relatives/close friends are employed in key positions. In the event an employee finds himself / herself in a position of having to decide on such a contract or arrangement, he/she should refrain from taking such a decision and refer the matter to his/her superior for taking a decision, clearly informing his/her superior of his/her relationship with key personnel in the concerned organisation.

5

No employee or his/her family member will act as a broker or on behalf of a third party in transactions involving or potentially involving his/her company.

6

Employees shall not exploit for their own personal gain opportunities that are discovered using corporate property, information or position.

7

No employee shall solicit or promote any personal/public cause or organisation or association during working hours.

As a rule, when in doubt, ask your Manager or the Directors of the company



# INTEGRITY

## Payments, Gifts, and Entertainments



Gifts, hospitality, and other benefits are only permitted in day-to-day business as long as they are within socially accepted norms. They may not be, nor give the impression of being, able to influence current or future business decisions.



Business courtesies are our way of creating goodwill and strengthening business relationships. However, an overly generous gift can appear to have intentions to influence decisions that will benefit the giver or make the recipient feel obligated to reciprocate in some way.



Employees should get the prior approval of the Manager to incur any expenses towards entertainment.



Business Heads are responsible to monitor the incurred entertainment expense patterns of their employees to ensure that the amount is used judiciously. All expenditure which does not have the necessary documentation, bills, etc. will not be reimbursed. Entertainment expenditure on alcoholic drinks is not permitted. Particularly strict rules apply if you have business dealings with public officials.

As a rule, when in doubt, ask your Manager or the Directors of the company





# Security and Information Management Standards.

## Company Property

All of us have a responsibility to safeguard and properly use MEPL property. The use of company property (including labour, supplies, equipment, buildings, or other assets) for personal benefit is prohibited where not Explicitly allowed by special agreements.

We protect the Company's assets and safeguard them from theft, waste, destruction and misuse. These assets include everything the Company uses to conduct business like warehouse stock, machinery, scrap material, money, access cards, computer hardware and software, as well as computer networks.

We attach great importance to the protection of intellectual property from unauthorized use or disclosure. Such property includes trade secrets; confidential information; copyrights; rights to trademark, patent an design protection; customer lists; business opportunities; and product specifications. This applies whether these intellectual property rights are held by a MEPL, affiliated companies or business partners.

Every employee must take reasonable steps to ensure that the Company receives good value for Company funds spent and must maintain accurate and timely record of expenditure



## Data and Information Security

In a highly competitive industry, we set an example by never using unethical means to gain information or insight on our competitors or on competitive services. Our intellectual property and confidential information are some of the Company's most valuable assets. Unless permitted, we must not use or share any information, with outsiders or those inside the Company who are not authorised to know these details.

Digitalization is a strategic imperative for enhancing the dialogue with our employees and customers and improving our operational efficiency. Safeguarding our IT infrastructure against tampering and unauthorized access is therefore a high priority for the MEPL.

Our employees and business partners must also protect our proprietary, confidential and sensitive information, pricing plans, information on potential investments, and any data that the Company may have designated as restricted or highly restricted.

## Social Media Policy

Respect, tolerance, honesty and integrity toward employees, customers and the general public also apply to our use of social media. As employees of the company, we must always express ourselves in a respectful and professional manner. Misuse of intellectual property or publication of confidential or internal data and information is prohibited.

Employees should refrain from interaction/communication with the print and electronic media on matters which are likely to have an impact on the image of the company as a whole without consulting the HR manager or Directors of the company.





# STANDARD FOR BUSINESS ACTIVITIES

## Procurement Practices

The Company's policy is to purchase supplies based on need, quality, service, price and terms and conditions. Suppliers should be selected based on merit, price, quality and performance. The Company's policy is to, as a rule, select significant suppliers or enter into significant supplier agreements through a competitive bid process. Under no circumstances should any Company employee, agent or contractor attempt to coerce suppliers in any way.

Supplies may be purchased from our customers when a combination of quality, price, services offered and reliability of supply warrant such purchases.

With suppliers we share our basic principles of ethical behavior, compliance with legal standards and respect for the environment. We expect them to base their actions on the same principles.

## Relations with Customers

The Company recognizes that our customers are of paramount importance and the company will prosper only to the extent that we meet and exceed the needs of our customers.

### **All employees will at all times:**

- Recommend to customers, services/products that are most appropriate for their needs from the Company's range of the services and product.
- Ensure that services/products supplied to customers are as per the stated quantity and specifications.
- Endeavour to meet delivery commitments to customers and inform customers well in advance in the event of inability to meet delivery commitments for unavoidable reasons.
- Promptly respond to all queries from customers.
- Handle all customer complaints promptly and fairly.



## Accounting and Reporting

The correctness and accuracy of accounting and financial reporting records provide the basis for our decision-making processes. We expect all business transactions in our accounting and reporting systems to be reported in a timely, accurate and complete manner in accordance with established procedures and applicable accounting standards.

Documents and reports must contain the necessary information about all transactions and be stored in accordance with corporate guidelines and relevant laws and regulations.


We follow applicable laws, regulatory requirements, and stringent standards in the recording of our financial records and accounts.



## Health and Safety

We design, operate, and maintain an injury-free workplace for our employees as well as those who enter our facilities. We must ensure that employees, contractors, and visitors are well informed, and given appropriate guidance to enable them to carry out their tasks in a safe and competent manner.

Our leaders understand that our ethical values and empathy make us who we are and encourage only the highest levels of safety accountability with regards to people on the team. To us, the safety, dignity and welfare of our associates as well as the people of the communities where we live, and work are absolutely non-negotiable.







# MORE INFORMATION

## **If you have questions**

If you have any questions about the Code of Conduct, contact [hr@mehtaexcel.com](mailto:hr@mehtaexcel.com)

## **Dealing with Violations**

We encourage you to report any violations of this Code of Conduct by contacting your manager and your HR department. You can reach the latter - where legally permissible also anonymously - by phone or email.

Your report will be kept confidential. No employee will be disadvantaged for any efforts made in good faith to report potential violations of the Code of Conduct. Please note that, if required by applicable law, information regarding the identity of the employee reporting a possible violation may under certain circumstances be disclosed to the persons or authorities involved in investigations or subsequent judicial proceedings.

If infringements are reported, we will take appropriate measures for proper clarification. Employees who fail to adhere to the Code of Conduct may face appropriate employment or disciplinary action that may have consequences under civil and criminal law.

## **Concluding Remarks**

The Code of Conduct is the basis and benchmark for all other guidelines and regulations that ensure responsible and ethically irreproachable conduct within the company. Together with the topic owners, we regularly review whether the standards set out in the Code of Conduct still meet current requirements. Any changes to be made to the Code of Conduct are decided by Mehta Excel Private Limited, Directors. This version was adopted by the Directors on October 1st, 2022.