



KVGGN SYNERGY PRIVATE LIMITED

CODE OF CONDUCT

KVGGN Synergy Private Limited

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Preamble

KVGGN Synergy Private Limited (including its subsidiaries and affiliated entities, hereinafter referred to as "KVGGN Synergy," "the Company," or "We") is committed to upholding the highest standards of business integrity and compliance. The Company strives to be a leader in ethics and governance within the Indian power sector, conducting business with honesty, integrity, and in alignment with legal and ethical standards in all jurisdictions in which it operates. This Code of Conduct provides guidance on appropriate personal and professional behavior, helps employees identify and address ethical issues, and fosters a culture of transparency, fairness, accountability, and integrity.

KVGGN Synergy expects all employees to adhere to these professional, ethical, and legal standards while contributing to the creation of an open, transparent, and supportive workplace.

Purpose

KVGGN Synergy requires its employees and directors to comply fully with all applicable laws and regulations, both in letter and spirit, and to conduct the Company's operations in line with international best practices. The Company's directors and employees must ensure that business is conducted efficiently and transparently, supporting the fulfillment of the Company's obligations to shareholders and other stakeholders. Employees and directors should refrain from engaging in any activities that could negatively affect the Company's goals or conflict with national interests. This Code outlines the expectations for the professional conduct of employees and directors and describes the way the Company conducts its business.

Failure to adhere to the guidelines set forth in this Code may result in disciplinary actions, as per the Employee Handbook. For additional guidance, employees are encouraged to consult with the Compliance Officer, either in person or via email compliance@kvggn.in.

Scope and Applicability

This Code of Conduct applies to:

- a. All employees of the Company, including permanent, temporary, and contractual staff.
- b. All directors of the Company.
- c. All subsidiaries, joint ventures, and affiliates in India where KVGGN Synergy exercises management control, either directly or through its subsidiaries.

The Code sets forth the professional standards for interactions with colleagues, external stakeholders, and value-chain partners, including suppliers, service providers, distributors,

contractors, consultants, intermediaries, agents, joint-venture partners, financial stakeholders, and other business associates. KVGGN Synergy also expects external stakeholders to align their actions with the principles outlined in this Code.

While this Code does not address every form of unacceptable behavior, employees and directors are expected to use their judgment to uphold the principles described herein.

Work Environment

At KVGGN Synergy, our people are our most asset. We are committed to providing equal opportunities for all employees and fostering an inclusive, respectful, and supportive work environment.

4.1 Equal Opportunity Employer

- KVGGN Synergy is an equal opportunity employer, offering fair and unbiased employment opportunities to all qualified candidates. We do not discriminate based on race, caste, religion, color, ancestry, marital status, gender, sexuality orientation, age, nationality, ethnic origin, disability, or any other status protected by law.
- Our recruitment, evaluation, and promotion decisions are based solely on individual performance and merit.
- We ensure clear terms of employment and provide opportunities for training, development, and performance management.

4.2 Dignity and Respect

- KVGGN Synergy is committed to creating an inclusive work environment based on tolerance, mutual respect, cooperation, and individual privacy. All employees are entitled to be treated with dignity and respect. We maintain clear and equitable disciplinary procedures, which guarantee the employee's right to be heard.
- We respect the privacy of our employees, and their behavior outside the workplace is not a concern unless it directly impacts work performance or the reputation and business interests of the Company.

4.3 Prevention of Harassment

- KVGGN Synergy is dedicated to maintaining a work environment free from unlawful harassment. We prohibit harassment based on race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other form of harassment

In compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (and any amendments), the Company prohibits any form of sexual harassment against male or female employees. Sexual harassment includes any unwelcome behaviors or conduct that causes discomfort or humiliation to an employee.

- Employees who believe they are being harassed or discriminated against should promptly notify the offender that the behavior is unacceptable. If direct Confrontation is not possible or effective, the employee should report the matter to the Internal Complaints Committee (ICC) within three months of the incident, or in the case of multiple incidents, within three months of the last occurrence. The complaint should include details of the incident and the names of the alleged harasser(s) and the victim(s), where available.
- The ICC will offer support and guidance as needed and will conduct a prompt and thorough investigation to resolve the issue.
- For more information, refer to KVGGN Synergy's Prevention of Sexual Harassment Policy.

4.4 Defining Workplace

- The term "Workplace" is defined as any location where KVGGN Synergy conducts business, including offices, plants, sites, facilities, and business units. It also encompasses corporate events, parties, functions, or outings organized by the Company for its employees or stakeholders.

5.0 Conflict of Interest

Conflicts of interest may arise when an employee stands to gain a personal benefit for themselves, a relative, or a related party (as defined under The Companies Act, 2013), or when an employee or director's independent judgment or ability to act in the best interests of the Company may be, or could be perceived to be, compromised.

Any situation that could place an employee in such a position, or create the appearance of bias, must be avoided. If an employee becomes aware of a potential conflict of interest, they should promptly disclose it by notifying their reporting manager or the Compliance Officer.

Employees are prohibited from pursuing any opportunities identified using Company property, information, or position, unless the opportunity is fully disclosed in writing to the Company, which must then authorize the pursuit. Additionally, employees are not permitted to engage in activities that directly compete with the Company's business.

Common situations that may create conflicts of interest include, but are not limited to:



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1. Direct reporting relationships with friends or relatives.
2. Full-time or part-time employment with another organization.
3. Freelance consultancy work.
4. Business interests as a proprietor, partner, or director in a competing or related firm.
5. Undisclosed directorships in other companies.
6. Related party transactions.

Upon joining KVGGN Synergy, and annually thereafter, all Key Management Personnel (KMPs, as defined under The Companies Act, 2013) and Directors are required to complete an annual declaration disclosing any outside business interests or directorships. All employees should be vigilant about potential conflicts as they carry out their duties and report any concerns to the Compliance Officer.

Registers

1. Conflicts Register:

All employees must disclose any potential conflicts of interest to the Compliance Officer, who will maintain a Conflicts Register. The Company's rationale for the decisions made regarding conflicts and the factors considered will be thoroughly documented.

2. Directorship Register:

All KMPs and Directors are required to disclose their directorships and other business interests to the Compliance Officer, who will maintain and update the Directorship Register accordingly. The register will be updated as needed to reflect any changes. Filing timelines will be communicated by the Compliance Officer to the relevant personnel.

Duties of Employees

- Act in the best interests of the Company and avoid any actions where personal interests may interfere, or appear to interfere, with business decisions.
- Obtain management approval if an immediate family member intends to conduct a business transaction with the Company.
- Continuously assess whether personal interests may conflict with or be perceived as conflicting with the Company's interests.
- Recuse yourself from decision-making processes that may create or appear to create a conflict of interest until you are confident none exists.
- In case of doubt, seek guidance from the Compliance Officer.

6.0 Anti-Bribery & Corruption

KVGGN Synergy is fully committed to adhering to all relevant anti-bribery and corruption laws in India, the UK, and international best practices, including the Prevention of Corruption Act, 1988, the UK Bribery Act 2010, and applicable



standards. The Company strictly prohibits offering, giving, or promising bribes, either directly or indirectly, to any government official or stakeholder with the intent to obtain or retain business, influence business decisions, or secure an unfair advantage.

- **Bribery**

Bribery refers to offering, promising, or giving any advantage (financial or otherwise) to induce an individual to act improperly. It also occurs when such an inducement is demanded or when there is an agreement to receive such an inducement, regardless of whether it is ultimately received.

A corporate entity may be criminally liable for failing to prevent bribery, including by individuals providing services for or on its behalf, such as employees, agents, joint ventures, representatives, and subsidiaries.

- **Corruption**

Corruption is the abuse of power or position for personal gain, particularly by individuals in public office. The risk of exposure to corruption increases when dealing with Politically Exposed Persons ("PEPs"). PEPs include individuals serving in public office, as well as their associates—family members, friends, or business partners—who may leverage their relationships to influence decisions or positions.

- **Facilitation Payments**

A facilitation payment is a payment made to expedite or secure the provision of routine government service. This is also known as "grease payment" or "speed money." KVGGN Synergy does not differentiate between facilitation payments and other forms of bribery or corruption, and all such payments are strictly prohibited.

- **Inducement**

An inducement refers to a promise or offer made to influence an individual to enter into a particular agreement or action.

- **Giving a Bribe**

It is illegal to offer, promise, or provide an advantage to someone: (i) with the intention that the advantage will induce or reward improper behavior, or (ii) knowing or believing that the recipient's acceptance of the advantage would constitute improper conduct. A person acts improperly when they violate the expectation that they will perform their duties with good faith or impartiality or breach the trust associated with their position.

- **Receiving a Bribe**

Employees who accept improper gifts, payments, or offers of hospitality may be committing an offense, including requesting, agreeing to receive, or accepting a bribe. Improper behavior is determined by whether the individual has acted in violation of an expectation of good faith or impartiality or has breached the trust inherent in their position.

- **Bribing a Public Official**

KVGGN Synergy employees must never offer or pay unofficial gratuities to government officials or employees to facilitate or expedite administrative actions such as customs clearance, visas, permits, or licenses.



- **Bribing through a Third Party**

Employees are also prohibited from using third parties as intermediaries to offer or

accept bribes on behalf of the Company. Any third-party arrangements must be transparent and comply fully with anti-bribery and corruption laws.

KVGGN Synergy employees must never pay an unofficial gratuity to government officials or government employees, using third parties. The Code of Conduct forbids paying, offering, asking for, proposing terms for, or accepting bribes with the assistance of any organization or individual. KVGGN Synergy or its employees will never authorize third parties to engage in bribery or corruption on their behalf. The Company may be held responsible for the conduct of third parties if they violate the law while working on KVGGN Synergy's behalf.

Employees are strictly prohibited from discussing business terms with individuals who demand or offer bribes.

Corruption Register

All reports of corruption including where favors are demanded must be reported to the Compliance Officer, who will maintain these records in the Fraud and Corruption register.

Duties of employees

- Comply with all relevant anti-bribery and anti-corruption laws.
- Never offer or accept anything of value meant to improperly influence business decisions.
- Report incidents of bribery or corruption, including situations in which a bribe was requested but not paid, immediately to the reporting manager or the Compliance Officer.
- Accurately recorded and fully disclosed transactions in which a bribe has occurred.
- When in doubt, consult the Compliance Officer or the legal team.

7.0 Gifts, Hospitality and Entertainment

Business Entertainment and Gifts

Business entertainment and the exchange of small gifts are commonly used in some regions to foster goodwill and build relationships with business partners and associates. However, such practices can also create perceptions of conflict of interest and undermine the integrity and value of our business relationships. Offering or Accepting gifts and entertainment can also compromise objectivity in business dealings and, in some cases, may result in legal violations.

It is crucial to recognize that there are ethical and legal obligations governing the exchange of business courtesies with vendors, suppliers, clients, and other business partners. To ensure compliance with these obligations, employees must exercise caution and judgment when offering or accepting such courtesies.

Gifts, Hospitality, and Entertainment



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(ii) KVGGN Synergy or its employees making an unethical offer to a third party, in which case KVGGN Synergy is the donor.

Definitions:

- **Gifts:** A tangible or intangible benefit provided to an individual, which may include, but is not limited to, cash, presents, recreational items, tickets to events, prizes, retail vouchers, loans, travel and accommodation arrangements, discounts, promotional items, or access to the donor's time, materials, facilities, or equipment.
- **Hospitality:** Business-related travel, accommodation, meals, and drinks provided to employees or associates.
- **Entertainment:** Attendance at sporting, recreational, or cultural events where the host is also present.

KVGGN Synergy follows the principle of NOT accepting or offering any gifts, entertainment or hospitality in the regular course of business.

Employees or members of their immediate families should not accept, provide, or solicit cash or equivalent, entertainment, favors, gifts or anything of substance to or from competitors, vendors, suppliers, customers or others that do business with or are trying to do business with KVGGN Synergy.

In exceptional cases:

- Gifts of nominal value may be accepted by KVGGN Synergy employees such as corporate calendars, pens, mugs, books, t-shirts, dry fruits, sweets or similar items.
- At corporate events hosted by KVGGN Synergy, the Company may choose to provide gifts or merchandise of nominal value such as corporate calendars, pens, mugs, books, t-shirts, or similar kinds of items. These will only be done with the written approval of the CEO.

Kindly refer to KVGGN SYNERGY's Anti-Bribery and Corruption Policy for further information.

Gifts Register

Employees must report all situations in which the gifts, entertainment and hospitality offered were of high value to the Compliance Officer, who will maintain a register documenting this information.

Political and Charitable Contributions

Political Contributions

KVGGN Synergy maintains a strict policy of political neutrality. The Company will not make any direct or indirect contributions, including financial or in-kind support (such as gifts, gratuities, or compensation) to any political campaign, party, candidate, or political organization. Company funds must not be used for political purposes without prior written approval from the Board.

KVGGN Synergy does not support any specific political party, nor will it express opinions on any political candidate, cause, or government decision. However, when necessary, the



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The company retains the right to communicate its position on significant issues to elected representatives or government officials. Any interactions with government or elected officials should be conducted only when required by business needs, and employees must only represent the Company at such meetings if specifically designated. These meetings should be conducted with integrity, in line with our Code of Conduct and applicable policies. While employees are entitled to their personal political beliefs, they may not use Company resources or premises to promote them or associate those beliefs with the Company.

Charitable Contributions

KVGGN Synergy may make charitable contributions if permitted by applicable law and approved by the Board of Directors. Prior to any contribution, the Company will conduct appropriate due diligence to ensure its contribution aligns with the Company's values and legal requirements.

Procurement

At KVGGN Synergy, we are committed to a rigorous and transparent procurement process. All third-party vendors and suppliers must undergo a comprehensive screening, which includes evaluating their commitment to business integrity. Vendors will be selected based on professionalism, competitiveness, and the ability to build a relationship of mutual trust.

Before awarding any contract, all competing parties must receive the same information. The selection process will consider factors such as:

- **Technical Competency**
- **Market Reputation**
- **Client Feedback**
- **Clean Track Record**
- **Pricing and Cost Effectiveness**
- **Alignment with KVGGN Synergy's Social and Environmental Standards**

KVGGN Synergy expects all business partners to uphold high standards of integrity and professionalism, comply with the laws of the countries in which they operate, and follow international best practices. Additionally, our business partners must adhere to KVGGN Synergy's Supplier Code of Conduct, which will be annexed to contractual agreements.

Duties of Employees

- Employees must **not** share confidential information about quotes or bids from suppliers with any competing third parties.
- Ensure that contracts are awarded and managed **without improper influence**.
- Avoid situations where partners or family members may benefit personally from the employee's position at KVGGN Synergy.



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- Select suppliers and award business **based on fair competition**.
- Choose suppliers committed to acting fairly and with integrity toward all stakeholders.

10. Fraud

KVGGN Synergy is committed to the highest standards of integrity and compliance and does not tolerate any form of fraudulent activity. **Fraud** is defined as any action where a person intentionally seeks to gain a dishonest advantage over another or cause wrongful loss, either through the concealment of facts or other deceptive means. This includes, but is not limited to, cheating, tricking, stealing, deceiving, or lying through false representations.

Examples of fraud include, but are not limited to:

- Submitting false or inflated expense reports
- Forging cheques or other financial documents
- Misappropriating company assets or misusing company property
- Unauthorized or fraudulent recording of transactions
- Inflating financial figures, such as sales or revenue numbers
- Providing inaccurate financial statements that do not adhere to applicable accounting standards

All employees at KVGGN Synergy share the responsibility of preventing fraud in the company's operations. Employees must remain vigilant and alert to potential fraud risks. If any employee becomes aware of, or suspects, fraudulent activity, they are required to report it to the Compliance Officer as soon as possible.

KVGGN Synergy has implemented a **Whistleblower Policy** to allow employees and directors to report any actual or suspected instances of unethical behavior, fraud, or violations of the company's Code of Conduct without fear of retaliation. For more details, please refer to the Whistleblower Policy.

Fraud Register

All employees at KVGGN Synergy share the responsibility of preventing fraud in the company's operations. Employees must remain vigilant and alert to potential fraud risks. If any employee becomes aware of, or suspects, fraudulent activity, they are required to report it to the Compliance Officer [at compliance@kvggn.in](mailto:compliance@kvggn.in). The Compliance Officer will maintain records in the **Fraud and Corruption Register**.



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KVGGN Synergy has implemented a **Whistleblower Policy** to allow employees and directors to report any actual or suspected instances of unethical behavior, fraud, or violations of the company's Code of Conduct without the fear of retaliation. For more details, please refer to the Whistleblower Policy.

11. Money Laundering

KVGGN Synergy is dedicated to ensuring that it does not facilitate the use of criminal proceeds (in any form, whether monetary or otherwise) or the concealment of such proceeds. **Money laundering** refers to the process by which the true origin and ownership of proceeds from criminal activities are disguised, enabling the proceeds to be used without suspicion.

Money laundering can occur through various assets, not just cash. It involves any transaction that facilitates the use of criminal proceeds, which are criminal if they represent a benefit derived from illegal activities, either directly or indirectly, and in whole or in part.

Traditionally, money laundering is a three-stage process:

1. **Placement** – This is the initial stage where criminal proceeds enter the financial system.
2. **Layering** – In this stage, complex financial transactions are conducted to obscure the illegal source of the funds.
3. **Integration** – This is the final stage, where the criminal proceeds are withdrawn from the financial system and used in ways that appear legitimate.

Any employee involvement in any part of the money laundering process may constitute a criminal offense. To maintain strong internal controls, KVGGN Synergy will not engage in any form of cash transactions. All payments will be processed through banking channels, in line with the Company's instructions on such matters.

Duties of Employees:

- Familiarize yourself with the Company's payment procedures.
- Be vigilant for any irregularities in payments.
- Promptly report any suspected payment irregularities to the Compliance Officer or the Finance team.

12. Data Privacy

KVGGN Synergy is committed to safeguarding personal data and complying with data privacy laws. Many jurisdictions require organizations to manage **Personal Data**, which refers to information relating to living, identifiable individuals, in a manner that protects individuals against the misuse of their personal information.

Employees have a responsibility to manage Personal Data in accordance with these laws and must ensure the following:



- Keep confidential any Personal Data held by KVGGN Synergy relating to individuals at other companies, including fund managers, portfolio companies, and co-investors.
- Keep confidential any Personal Data held by KVGGN Synergy relating to the Company's employees.
- Take care not to remove Personal Data from the office or share it without proper authorization.
- Always report any requests to disclose Personal Data to the Compliance Officer and cooperate fully in handling such requests.

Additionally, employees should be mindful when sending emails, text messages, or any form of written communication containing Personal Data. Extreme care should be taken when describing individuals in writing. Employees should consider how they would feel if their comments were disclosed through a formal access request and made publicly available, including the name of the author.

While KVGGN Synergy does not prohibit employees from holding personal views or judgments about individuals, employees are encouraged to use **prudent, non-inflammatory, non-judgmental, and non-discriminatory language** when describing individuals in their reports, emails, texts, and other communications.

It is essential to remember that any written communication containing Personal Data may be subject to disclosure under applicable data privacy laws. Employees should act accordingly and take appropriate steps to safeguard such data.

13. Confidentiality and Intellectual Property

The proper handling of **confidential information** is critical to maintaining the integrity and reputation of KVGGN Synergy. All employees have a contractual duty to safeguard the Company's confidential information. Confidential information should only be used for its intended purpose and should not be used for personal benefit or for any other purpose unrelated to the business needs.

Particularly, **price-sensitive information** must only be disclosed on a **need-to-know basis** and should not be shared without the appropriate confidentiality safeguards in place. Employees who improperly use or communicate confidential information may face disciplinary action.

Even if no formal confidentiality agreement is in place, KVGGN Synergy may still have common law obligations to protect confidential information received from third parties. The absence of a written confidentiality agreement does not permit information to be treated without care and attention.



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When deciding whether to share information, either within KVGGN Synergy or with external parties, employees should carefully assess whether the information is confidential or could be perceived as such. Employees should also evaluate any potential risks or adverse consequences that could arise from sharing sensitive information. This applies to both internal sharing (across different departments or teams) and external communication.



In some instances, KVGGN Synergy may implement systemic barriers (e.g., security protocols) to protect sensitive information. Employees should also exercise caution everyday activities to avoid accidental disclosure of confidential information.

Common sense precautions include:

- Avoid reading **price-sensitive material** in public areas (e.g., on public transport).
- Refrain from discussing **sensitive matters** in public spaces.
- Ensuring confidential information on laptops, phones, or personal devices is not visible to others.
- Dispose of **sensitive materials** securely (e.g., by shredding).

All information related to the Company's business, its customers, suppliers, and other stakeholders must be considered **privileged and confidential** and should be held in confidence unless:

- Authorized by the Company.
- The information is in the **public domain** at the time of disclosure.
- Disclosure is required by **applicable laws**.

In cases of uncertainty regarding the handling of confidential information, employees should consult the **legal team** for guidance.

14. Protection and Use of Company Property

Employees are responsible for protecting the Company's assets from theft, loss, damage, or misuse. This applies to both tangible assets (such as equipment, machinery, systems, and materials) and intangible assets (including proprietary information, customer relationships, and supplier relationships). The assets should not be used for personal gain or for the benefit of related parties.

Intellectual Property rights belonging to KVGGN Synergy and third parties, including trademarks, service marks, patents, and copyrights, must be properly protected and respected by all employees.

Duties of Employees:

Safeguard Company assets from theft, misuse, and destruction.

- **Obtain written authorization** from your reporting manager to use KVGGN Synergy's assets and resources for personal, community, or charitable activities
- **Comply with KVGGN Synergy's IT policy** to ensure proper handling of the Company's electronic resources.



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- **Personal use** of assets such as computers, printers, and copiers are allowed only for minor and incidental purposes, provided that:
 - The use is **minimal** and does not result in significant incremental costs.
 - It does not **interfere with work duties**.
 - It does not violate any **laws**.

15. Financial Information

KVGGN Synergy is committed to providing a true and fair representation of its financial position, in compliance with the accounting standards set by Indian Accounting Standards (Ind AS). Employees must represent financial information accurately and fairly. No entry should be made in our records that distorts or disguises the true nature of any transaction.

An accurate and auditable record of all financial transactions related to the Company must be maintained in accordance with Ind AS. Falsification or alteration of records, whether financial or non-financial, is prohibited. We must never instruct a third party to prepare or approve a false or misleading record, nor should we do so ourselves under any circumstances.

KVGGN Synergy's funds should only be used for legitimate business purposes. All Company policies regarding expense limits, use of corporate credit cards, preferred travel vendors, necessary management approvals, receipts, expense reports, and other travel-related matters must be followed honestly. Employees are expected to truthfully, accurately, and completely record all travel and hospitality expenses.

In situations where two or more KVGGN Synergy employees are present for a meal, most senior employees should pay the bill and submit the expense claim. The employees who attended the meal should be listed on the receipt accompanying the expense claim. Reimbursement expense claims must be genuine and correct.

Duties of Employees:

- **Ensure all financial transactions are appropriately authorized.**
- **Accurately record all expenses, assets, liabilities, and revenues.**
- **Never hide, alter, falsify, or disguise** the true nature of a record or transaction.
- **Ensure no deviation from the chain of authority and approval levels** by splitting invoices while claiming expenses.
- **Cooperate fully with audits**, as well as any internal or government investigations.
- **Report any accounting or auditing irregularities**, incidents of fraud, or other issues that could result in inaccurate financial representation.



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KVGGN Synergy's directors and employees must ensure that there is no willful omission of any Company transactions from the books and financial records, and all required information shall be provided to the Auditors.

16. Prohibition of Insider Trading

Employees may have access to proprietary and confidential information that could impact the value of KVGGN Synergy or a third party's shares. Employees must remember that insider trading laws prohibit the use of such information for personal gain or the disclosure of such information to external parties, including family members.

Examples of such information include:

- KVGGN Synergy's results announcements
- Minutes of board meetings
- Proposed dividend announcements
- Potential acquisitions or divestments
- Announcements of mergers, joint ventures, or legal proceedings

No employee, directly or indirectly, shall trade in securities of KVGGN Synergy or a business partner of the Company, listed or proposed to be listed on a stock exchange, when in possession of unpublished price-sensitive information. As applicable, employees shall also ensure compliance with the **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015** (including any amendments thereto) and other applicable laws and regulations.

17. Competition and Anti-Trust Laws

KVGGN Synergy is committed to competing vigorously but fairly and ethically for all business opportunities. Anti-trust laws prohibit behavior that unlawfully limits trade or restricts fair competition. These laws may be applicable whenever an employee is:

- Dealing with competitors
- Dealing with customers
- Dealing with suppliers
- Participating in industry associations
- Collecting competitive information

Anti-competitive behavior is illegal and may damage the business and reputation of KVGGN Synergy.

In situations where employees may be more likely to interact with competitors, such as at trade shows, conventions, trade association meetings, and other industry events, it is



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important to avoid even the appearance of anti-competitive conduct. Employees have a responsibility to understand what activities could violate laws protecting fair competition.

Duties of Employees:

- **Understand how competition laws** apply to KVGGN Synergy and its business.
- **Treat all customers and suppliers** honestly, fairly, and objectively.
- **Select suppliers based on merit**, making clear to all suppliers that KVGGN Synergy expects them to compete fairly and vigorously for the Company's business.
- **Avoid unfair or deceptive practices.**
- Always **present KVGGN Synergy's services and products in a honest manner.**
- **Immediately leave any meeting or informal gathering** where competitors are exhibiting anti-competitive behaviors.
- **Report on any discussions or behaviors** that could be considered anti-competitive.
- **Seek the advice** of your reporting manager, Compliance Officer, or the legal team if you are unsure how to handle a situation.

18. Health, Safety and Environment

KVGGN Synergy manages Quality, Health, Safety, and Environment (QHSE) responsibilities as a top priority. We are committed to continually improving our QHSE performance and managing the risks associated with our business activities, products, and services by providing sustainable and economical energy to our customers, particularly through investments in renewable energy technologies. The Company strives to provide a safe and healthy working environment while ensuring compliance with all regulations regarding the preservation of the environment in the territories where it operates.

KVGGN Synergy aims to maintain a QHSE management system, integrating QHSE considerations into all aspects of the Company's operations. We implement the Quality, Health, Safety, and Environment Policy to prevent accidents, incidents, and occupational illnesses to people and the environment, while delivering customer satisfaction.

KVGGN Synergy advocates fair treatment of workers and strives to identify and address any issues related to labor and working conditions, both for permanent employees and contracted workers. The Company's **Labor and Working Condition Policy** is designed to manage and mitigate any adverse workplace conditions and the impact of our operations by focusing on the following principles:

- **Promoting fair treatment, non-discrimination, and equal opportunity** for all workers on any grounds.
- **Complying with national employment and labor laws.**



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- **Promoting safe and healthy work environments.**
- **Protecting workers' rights**, especially for vulnerable categories such as migrant workers, third-party workers, and workers in the client's supply chain
- **Commitment to an incident- and injury-free workplace** with a focus on health and well-being.
- **Prohibiting the use of forced and child labor.**
- **Recognizing the right of all workers** to freedom of association and collective bargaining.
- **Prohibiting coercion, intimidation, and sexual harassment** in the workplace.
- **Commitment to gender equality** and equitable, transparent remuneration systems.
- Providing a **clear platform for workers to raise grievances** and ensuring redressal. KVGGN Synergy requires all employees and directors to comply with both the **QHSE Policy** and the **Labor and Working Conditions Policy** and to perform their duties in a manner consistent with the objectives of these policies.

19. Alcohol and Substance Abuse

KVGGN Synergy has a strict policy against the abuse of alcohol, drugs, or chemical substances. The use or possession of alcohol, illegal drugs, and other controlled substances in the workplace, as well as being under the influence of these substances while on the job or during working hours, is strictly prohibited.

Employees are expected to report to work fit for duty and free from the adverse effects of alcohol or illegal drugs. This policy does not prohibit the lawful use and possession of prescribed medications. However, employees must consult with their doctors regarding the effects of the medications on their fitness for duty and ability to work safely. Any work restrictions resulting from the use of prescribed medications must be promptly disclosed to their Reporting Manager.

Any employee arriving at the workplace under the influence of alcohol or illegal drugs may be subject to disciplinary action. Alcohol- or drug-induced misbehavior, if proven, will result in the immediate termination of employment.

For Company-sponsored events where the management approves the serving of alcoholic beverages, appropriate liquor laws must be followed, including those prohibiting the serving of alcohol to individuals under the legal drinking age. In all such cases, excessive drinking, intoxication, and misbehavior are prohibited.

20.0 Media Interactions

Use of social media

Social media covers social networking websites such as Twitter, Facebook, LinkedIn, personal and professional websites, blogs, chat rooms, video sharing sites like YouTube etc.



Employees are personally liable for all communications and information they publish on social media and the Company shall not be liable in any manner whatsoever. Any information that employees publish on social media is their opinion and should not be attributed to the Company.

Company email addresses and assets should only be used for job-related activities and not for personal social networking.

Sharing of any proprietary or confidential Company or client information online could result in legal action against the employee.

Interactions with Media Outlets

Employees must not make any statements or provide information or documents to the media, directly or indirectly, which concern the business or clients, employees or officers of KVGGN Synergy or their employment unless they are specifically authorized to do so. Any breach of this provision may result in disciplinary action.

The CEO is the official spokesperson for KVGGN Synergy unless directed otherwise by the CEO. If the media sends any query, employees should promptly route the query to the CEO.

21.0 Compliance with Laws and Agreements

KVGGN Synergy requires that its employees and directors strictly comply with the applicable laws and regulations in the conduct of its business, both in letter and spirit. If the ethical standards set forth in this Code of Conduct are more rigorous than the applicable laws and regulations, then the standards of the KVGGN Synergy Code of Conduct shall prevail.



22.0 Misconduct and Non-Compliance with the Policy

The matters covered in this Code of Conduct are of utmost importance to KVGGN Synergy, its shareholders and its business partners, and are essential to the Company's ability to conduct its business in accordance with its stated values. KVGGN Synergy expects its directors and employees to adhere to these rules in carrying out their duties for the Company. Any non-compliance with this Code of Conduct will be considered misconduct and the Company will take appropriate disciplinary action.

23.0 Contact

For further information or clarification with respect to any provisions of the Code of Conduct, employees can consult with the Chief Compliance Officer in person or via email compliance@kvggn.in.

24.0 Accountability

This Code of Conduct is more than a set of prescriptive guidelines issued solely for regulatory compliance. It represents KVGGN Synergy's commitment to its value system and principles. Therefore, every employee should expect to be held accountable for his/her behavior at the workplace. If such behavior violates this Code of Conduct, they may be subject to disciplinary action. When followed in a letter and in spirit, this Code of Conduct represents our shared responsibility to all our stakeholders, and our mutual commitment to each other.

25.0 Amendments

From time to time, changes in the business context or regulatory environment will require the adoption and implementation of new principles, guidelines or regulations.



KVGGN SYNERGY PRIVATE LIMITED