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Code Of Business Conduct  
Version 1.3

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## Code Of Business Conduct

### 2 Property Information

This document is the property information of Shiprocket Private Limited (hereinafter referred to as “Shiprocket & Group companies”).

### 3 Document Control

#### 3.1 Information

Title	Classification	Version	Status
Code Of Business Conduct	Public	1.3	Approved

#### 3.2 Revision History

Author(s)	Date	Version	Summary of Changes
HR Team	15 Mar 2023	1.0	First version of the policy.
HR Team	16 Nov 2023	1.1	Formatting changes; no content change
HR Team	04 Apr 2024	1.2	Changes in scope of the policy
HR Team	28 Aug 2024	1.3	Legal entity name change

#### 3.3 Review and Approval

Name	Designation	Approved on Date
Saumya Khati	CHRO	16 Nov 2023
Saumya Khati	CHRO	04 Apr 2024
Saumya Khati	CHRO	28 Aug 2024

#### 3.4 Distribution list

Recipients	Location
All Users	Darwinbox

#### 3.5 Effective Date

Effective Date for this policy will be 15 Mar 2023

## 4 Policy Overview

### 4.1 Purpose

A guide to help whenever there are questions about ethics or if one is faced with an ethical dilemma. It is our North Star & our moral compass.

### 4.2 Scope

This policy applies to all Shiprocket & Group company's employees who are on the company's payroll.

It sets out how we behave with our employees, customers, communities, and the environment in which we operate, our service providers, financial stakeholders, our group of companies and the government of the country.

### 4.3 Exclusions

None

### 4.4 Ownership

This document is owned and maintained by the Shiprocket HR Team.

### 4.5 Policy Location

This policy is easily accessible to all Shiprocket & Group company's employees through Darwinbox App.

### 4.6 Policy

#### 4.6.1 Our Employees

##### a) Dignity and Respect

a. Being Humble and Respectful is one of our core values and we are committed to creating an environment of well-being and psychological safety where everyone is treated with dignity and respect, irrespective of level, position, or mode of employment. This applies to both everyday behaviors and both verbal and non-verbal communication.

##### b) Equal Opportunity Employer

The company is committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity. All employees will be provided with a level playing field irrespective of gender, race, religion, age & social background to be able to compete for advantaged offices & positions & will be assessed solely on merit & ability.

##### c) Anti-Bribery & Corruption

In the spirit of creating an ethical workplace, it is expected that our employees shall not, directly, or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favors/influence for the conduct of our business.

##### d) Gifts and Business Courtesies

Company does business with customers and other parties based on objective performance and business criteria and our employees are expected not to ask or accept any gifts or personal benefits for themselves, friends or family from customers, service providers, contractors and partners in exchange of doing or promising to do any work.

##### e) Integrity of Information, Asset & Data Protection

To protect the organization's Intellectual Property, information & assets, our employees are expected not to make any willful omissions or material misrepresentation of company's information and shall use company assets only for the purpose for which they are provided in order to conduct business. Authorized company spokespeople will share company information with the external world at appropriate times.

f) Insider Trading

In our organization, we believe in maintaining confidentiality of Unpublished Sensitive Information and so our employees are expected not to indulge in any unfair practice nor assist others, to derive any benefit from access to and possession of strategic/price/customer sensitive information that is not in the public domain. We must handle personal/company data responsibly and in compliance with all applicable law.

g) Drugs & Substances

We are committed to providing a safe and productive work environment for our people & will actively work towards ensuring the Health & Wellness of our employees. In our organization, employees are prohibited from using, possessing, selling, or being under the influence of drugs and alcohol or any other illegal substances on duty or at office premises or while representing Shiprocket or Group companies.

h) Conflict of Interest

At the time of employment, employees should make full disclosure to the competent authority of anyone in the immediate family, if they have a family business or a company or firm that is a competitor, service provider, customer or has other business dealings with our company to avoid any conflict of interest.

i) Fraternalization at Workplace

We believe in creating a fair and unbiased workplace with no discrimination in dealing with employees. It is advisable not to have a romantic relationship with another employee if the employee is in your chain of command or has influence over the conditions of employment or performance rating.

j) Dealing with social media

These are guidelines for employees who post content on the Internet either as part of their job or as a private person. While using social media, employees are encouraged to be Authentic, Relevant & Respectful. To help companies curb any legal or security issues, avoid any defamatory, offensive or derogatory content. Whenever in doubt, please reach out to your reporting manager/HR before posting.

k) Open & Honest Communication

- a. In our organization, we value the voice of our employees, and every employee is expected to speak his or her mind, particularly with respect to ethical concerns.
- b. We will disallow retaliation against whistleblowers who raise genuine ethical concerns in good faith.

4.6.2 Our customers

a) Dealing with customers

- c. Dealings with Customers We respect our customers' right to privacy in relation to their personal data and shall safeguard our customers' personal data (e.g., name, contact, address, financial standing, customers, decision history etc.) in accordance with applicable law.

4.6.3 Our Communities and The Environment

a) Dealings with Communities

d. In our organization, we are committed to good corporate citizenship and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate. This will include but will not be limited to playing a supportive role in society.

i. b) Dealings with The Environment

e. In our organization, we strive for environmental sustainability and comply with all applicable laws and regulations in our business and seek to prevent the wasteful use of natural resources and are committed to improving the environment.

4.6.4 Our Service Providers

b) Dealings with Service Providers

f. In our organization, we select our carrier partners/service providers fairly and transparently who share similar values. We respect our obligations on the use of third-party intellectual property and data.

4.6.5 Our Financial Stakeholders

a) Dealing with Financial Stakeholders

g. In our organization, we shall inform our financial stakeholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable law and agreements.

4.6.6 Our Government

a) Dealings with The Government

h. In our organization, we shall act in accordance with the constitution and governance systems of the countries in which we operate. We will abide by all laws & be model corporate citizens.

4.6.7 Our Group Companies

a) Dealing with Group Companies

i. We seek to cooperate with our group companies by sharing knowledge, physical resources, human and management resources and adopting leading governance policies and practices in accordance with applicable law including adherence to competition law, where relevant.

i. **5. Adherence to Code**

j. We encourage our employees, customers, and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law. Avenues available for raising concerns or queries or reporting cases could include: • Reporting Manager, Functional Head or the Human Resources Department of our company • Ethics Officer – Saumya Khati (saumya.khati@shiprocket.com)

k.

ii. **6. Taking Accountability | The Buck Stops Here**

l. Each one of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. Every person employed by us, directly or indirectly, should expect to be held accountable for his/her behavior. The organization will educate all employees on the same. However, should such behavior violate this Code, they may be subject to action according to employment terms and relevant company policies.

iii. **7. Acknowledgment**

m. I acknowledge that I have received and read the Shiprocket & Group companies Code of Business Conduct and as a Shiprocket or group company employee, I am required to comply with the guidelines described therein and failure to do so may subject me to action as per my employment terms and relevant company policies. If I have a concern about a violation, or a potential violation of the Shiprocket & Group companies Code of Business Conduct, I understand that there are channels available to me in my company to report such concerns.

<b>Signature</b>	
<b>Date</b>	
<b>Name</b>	
<b>Department</b>	
<b>Address</b>	

For any concerns, the employees can reach out to respective HRBP.

*Disclaimer: The Company reserves the right to amend, suspend or withdraw this policy, guidance, and procedure at any time without notice. Further, the Company reserves the right to administer discipline in such a manner as it deems appropriate to the circumstances, and may, in its sole discretion, eliminate any or all of the steps.*

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