



CODE OF CONDUCT FOR
EMPLOYEES

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1. INTRODUCTION

i. The purpose and our values

This Code of Conduct (hereby referred to as ‘Code’) sets forth Blinkit Foods Limited’s core values, and shared responsibilities into practice. It is built around the recognition that everything we do in connection with our work at Blinkit Foods Limited (‘**Company**’/ ‘**BFL**’) will be, and should be, measured against the highest possible standards of ethical business conduct. We set the bar that high for practical, as well as aspirational reasons. Our commitment to the highest standards helps us hire great people, build great products, and attract loyal users.

This Code has been adopted by the Board of Directors of Blinkit Foods Limited and sets out the values and integrity levels of business conduct that the Company expects all employees to abide by during the course of their employment at BFL and in all business relationships.

This Code should be read in conjunction with relevant Company policies and procedures and applicable laws.

ii. Your responsibilities

The employees will receive a copy of this Code at the time of joining BFL and are required to confirm their acceptance to adhere to the principles enumerated in this Code. Additionally, the employees need to complete all the requisite training in a timely manner. They must remember that under no circumstances does failure to (i) read this Code; or (ii) sign an acknowledgement or certify online, exempt them from the obligation to comply with this Code.

Employees are mandated to:

- i. Read and understand the importance of this Code, follow it consistently and periodically sign an acknowledgement of the same
- ii. Complete all required training(s) related to this Code and other Company policies and procedures in a timely manner;
- iii. Know that violation of this Code will result in disciplinary action (and may include, but not limited to termination of employment);
- iv. Use good judgement and demonstrate a high degree of personal and professional integrity and honesty at all times, even in situations that are not specifically addressed by this Code;
 - v. Follow this Code as a guideline for decision making that is paired with integrity;
 - vi. Lead by example, by modelling ethical decision making;
- vii. Consider conduct in relation to this Code and other Company policies;
- viii. Seek advice or clarification whenever unsure of the right thing to do; and
- ix. Report known or suspected violations to appropriate channels, as soon as you become aware of it.

A copy of this Code will also be available on the Human Resource Information System (HRIS).

iii. Responsibilities of People Managers:

As a people manager, you should at all times model appropriate conduct and:

- i. Promote a culture of ethics and compliance;
- ii. Ensure that your team members are aware of applicable laws, regulations, and Company policies and procedures that govern the respective areas of responsibility/ work and receive adequate guidance and training to perform their jobs the ethical way, as prescribed in this Code;
- iii. Create an environment of openness and trust where your team members feel secure and comfortable in asking questions and raising concerns, without fear of retaliation;
- iv. Discourage your team from achieving business results at the expense of compromising ethical conduct or compliance with this Code or applicable laws; and
- v. Escalate any issues or concerns to the appropriate reporting channels in a timely manner.

iv. Speak up: Seek help or report

If you have a concern and/or in doubt regarding any provision of this Code, you should seek clarification, from any of the below reporting channels:

- i. Your manager
- ii. Your Skip-level manager
- iii. People Team

This Code cannot possibly address every situation we face at work. Therefore, you are expected to exercise good judgement and seek help for guidance or clarification.

If you wish to raise a concern about actual or suspected violation of this Code, you are required to write to any of the below reporting channels, as you deem appropriate:

- i. People Team (peopleassist@blinkit.com), in case of any violation which relates to personal grievances or your employment, such as (i) superior- subordinate relationship, (ii) relationship with peers, (iii) performance evaluations, and alike
- ii. speakup@blinkit.com if you believe you have faced any form of sexual harassment
- iii. coc.concern@eternal.com if you believe there is a violation of this Code (such as suspected fraud, bribery or corruption) which may be considered as a Reportable Matter in accordance with the Vigil Mechanism & Whistleblower Policy of Eternal Limited.
- iv. Reporting Manager or People team in case the concern does not fall in any of the above.

This clause should be read in conjunction with the Vigil Mechanism & Whistleblower Policy of Eternal Limited and Prevention of Sexual Harassment Policy of BFL, as applicable.

2. DOING BUSINESS, THE ETHICAL WAY

i. Compliance with Laws and Regulations

BFL is committed to full compliance with the laws, rules and regulations of the countries in which it operates. BFL has a Compliance Management Framework which is reviewed internally and externally on a periodic basis. You must conduct business as responsible corporate persons, and must comply with all applicable governmental laws, rules and regulations. You should avoid any activity that could involve or lead to involvement in any unlawful or illegal practice or cause any harm to BFL's reputation or image or interest. You must acquire appropriate knowledge of the legal requirements relating to your duties/work/business to recognize potential non-compliances/ dangers. In case of doubt, you must seek help for guidance and clarification from the Compliance/ Legal team.

ii. Free and fair competition

BFL competes on the merits of its products and services. It is in BFL's best interest to promote free and open competition.

- i. Employees are obligated to deal fairly with customers, merchants, suppliers, competitors and other third parties engaging/dealing with BFL. Employees should not take unfair advantage of anyone through manipulation, concealment, or abuse of privileged information/position, misrepresentation or any other unfair-dealing practice.
- ii. BFL expects you to maintain a commitment to comply with the antitrust legislations and competition laws applicable to the business of BFL.
- iii. As a rule of thumb, you must not:
 - a. Directly deal with, contact or engage with competitors that may create a potential conflict with the provisions of competition law;
 - b. Share or part with BFL specific information in an industry forum or enter into agreements with competitors on any matter, unless done after due consultation with the legal department in advance; and
 - c. Enter into agreements that may be constructed 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.
 - d. Engage in any activity that may restrict the freedom of choice for customers or free competition in any manner, while designing, promoting and selling our products and services.

iii. Anti-Bribery and Anti-Corruption

BFL strictly prohibits bribery and corruption in any form. You must comply with all applicable laws relating to gifts, bribery, corruption, facilitation payments and other improper payments. However, even in countries where the local law does not prohibit such conduct, it is strictly prohibited by the internal policy of BFL for you to make any payment/s to any person or persons, including public officials, customers, merchants or consultants or any other third party dealing with BFL, to obtain or retain business, influence business decisions or secure an unfair advantage.

This includes bribes, kickbacks and facilitation payments.

We uphold all laws relevant to countering bribery and corruption applicable to us in the conduct of our business across all the jurisdictions in which we operate including, wherever applicable, the Prevention of Corruption (Amendment) Act, 2018 and its amendment (PCA); the Foreign Corrupt Practice Act, 1977 (FCPA); and United Kingdom Bribery Act, 2010 (UKBA).

This clause should be read in conjunction with the Anti-Bribery and Anti-Corruption policy of Eternal Limited.

iv. Anti-Money Laundering and Anti-terrorist financing

Money laundering is the process by which funds generated from criminal activity such as drug trafficking are moved through legitimate businesses in order to hide their criminal origin. Terrorist financing refers to funding for terrorist activities and can come from legitimate or criminal sources.

BFL only associates with entities and individuals involved in lawful business activities with funds derived from valid sources and not with those who may be involved in criminal activities or are part of any sanction list. BFL is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world.

You shall not engage in or aid or abet any other person to engage in the following prohibited transactions:

- a. Any financial transaction that promotes or results from criminal activity;
- b. The receipt, use, diversion or concealment of the proceeds of any criminal activity;
- c. Any act of terrorism, including providing financial support or otherwise sponsoring or facilitating any terrorist, activity or organisation;
- d. Any arrangement or dealing with a Third party, that is or has connection with a Politically Exposed Person (PEP) and/or sanctioned individual/entity.
- e. Any arrangement that would result in a violation of this Code or other Company policies.
- f. Third party (including but not limited to, service providers, consultants, merchants, distributors, contractors, vendors, suppliers, or other third parties, whether an individual or an entity, who is employed on a contract basis, or retained to assist BFL in any function of the business) who is reluctant to provide complete information and/or provide insufficient, false, or suspicious information.
- g. Third party who expresses concern about, or wants to avoid, reporting or record-keeping requirements.
- h. Requests to pay more than provided for in the third-party contract
- i. Payments made in currencies other than those specified in the contract.

v. Avoiding Conflict of Interest

BFL is committed to conducting business in a manner that ensures one's business judgement and decision making is not influenced by undue personal interests. Conflict of Interest (COI) may arise when an employee places his or her personal interests above the interests of BFL and where such personal interests unduly influence business judgement, decisions, or actions.

BFL respects each one's rights and choices and does not wish to interfere with their personal lives, however, avoidance of conflict is an important part of maintaining integrity and sustainability of our business and builds trust and support with our key stakeholders.

A conflict situation could be actual or perceived and may be an event or circumstance when a person does or consciously fails to do an act which allows the person to derive personal gains.

If any of the key principles of COI as detailed in *Conflict of Interest policy* are applicable to you, then you must disclose such interest on HRIS portal and get it approved. It is pertinent to note that, disclosure must take place as soon as one identifies the conflict and whenever possible, but before engaging in the conduct in question. Business and relationships are dynamic and when circumstances change, existing disclosures may no longer be accurate or complete.

When this happens, it is your responsibility to freshly disclose the conflict of interest.

This clause should be read in conjunction with the Conflict of Interest policy.

vi. Dealing with Third parties

BFL is committed to the highest ethical standards in dealing with third parties. Dealing with third parties (including but not limited to, service providers, consultants, merchants, distributors, contractors, vendors, suppliers, or other third party, whether an individual or an entity, who is employed on a contract basis, or retained to assist BFL in any function of the business) should be in a fair and ethical manner.

You must adhere to the following:

- a. Safeguard the confidentiality of all third party intellectual property and data and shall not misuse such intellectual property and data that comes into their possession and shall not share it with anyone, except in accordance with applicable Company policies or law.
- b. Understand the business rationale, including its business reputation, and select them on merit basis fairly and transparently.
- c. Maintain accurate and complete official records with the utmost integrity. All agreements and transactions should be documented. Ensure all third parties (e.g. merchants) are made aware of the need to comply with the applicable Company policies and guidelines and report any violation thereof.
- d. Disclose any personal relationship with a potential third party to your reporting manager and on HRIS portal to ensure they are not involved in the selection process and negotiations.

BFL would not be responsible for any misconduct or misbehaviour on your part in an interaction with any third parties (customers, merchants, vendors). It shall be your responsibility to ensure they do not exhibit any such behaviour.

vii. Environmental Commitment

As a responsible entity, BFL is committed to demonstrating a high standard of environmental protection and operating in an environmentally responsible and sustainable manner while minimizing our ecological footprint. Environment sustainability at BFL is based upon and guided by our sustainability strategy and strong governance, as illustrated in the Environmental Policy.

Our business operations and value chain result in direct and indirect impacts on the environment. We take responsibility for the environmental footprint created by our business operations and are committed to minimizing the ecological impact of BFL's operations.

This clause is to be read in conjunction with the Environmental Policy of Eternal Limited.

viii. Dealing with Governments and Industry Associations

At the Company, we believe that responsible advocacy can help enhance the growth of the sector and contribute to the development of the country we operate in. In view of this, we believe that it is important to engage with governments and industry associations to provide inputs through stakeholder interactions.

The Company's engagement with the governments and industry associations is guided by the values of commitment, integrity, transparency, and the need to balance interests of diverse stakeholders. Any employee dealing with governments and/ or industry associations should:

- 1) Exhibit professionalism, honesty, integrity openness and transparency
- 2) Engage responsibly in stakeholder consultations, and provide fact based information and technical expertise to policymakers
- 3) Comply with applicable laws and regulations
- 4) Respect confidentiality of the information obtained

If in doubt, please escalate the matter to your reporting manager or write to public.policy@eternal.com.

3. SUPPORTING PEOPLE AND WORKPLACE WELLNESS

BFL is committed to provide a work environment that is open, mutually supportive and free of inappropriate behaviour of all kinds and harassment, including but not limited to, harassment based on pregnancy, childbirth, medical conditions (such as HIV positive), race, religious creed, colour, sex, gender (including transgenders), gender identity, national origin or ancestry, physical disability, medical condition, marital status, age, sexual orientation, or any other basis protected by federal, state, local law, ordinance or regulation.

BFL maintains professionalism through exercising high standards of integrity and honesty at work, mutual respect towards other individuals in building cordial relationships, good business practices and maintaining a high level of competence.

BFL is an equal opportunity employer and employment decisions are solely based on merit and business needs.

i. Diversity and Inclusion (D&I)

BFL recognizes that diversity is found in any social identity, such as gender, age, culture, nationality, ethnicity, physical abilities, political and religious beliefs, sexual orientation, and other attributes. Inclusion is the process of involving, accepting, and valuing all people in the workplace regardless of their differences and social identity. BFL believes that D&I at the workplace is an instrument for growth and we value and celebrate the uniqueness of every individual by fostering an environment of inclusion and empowerment. Our policies and practices are gender agnostic. We value all of you and each one of you.

This clause is to be read in conjunction with the Equal Opportunity, Diversity & Inclusion Policy of Eternal Limited

ii. Health and Safety in the workplace

BFL promotes your well-being and is committed to provide good and safe physical working conditions. You should exercise high standards of safety, hygiene and housekeeping. Health and safety are of paramount importance.

- a. You must comply with BFL's health and safety norms, as communicated to them from time to time and should bring to the Management's attention any workplace safety or health hazard.
- b. It is mandatory on your part to eschew unsafe and dangerous practices or measures, even if these are considered appropriate for business interest reasons. You should attend safety training sessions (as and when organised by BFL) for increasing safety awareness and adoption of safe working methods.
- c. BFL sets expectations for social responsibility in our partner chain and endeavours to select third parties (e.g. vendors, suppliers and business partners) who- demonstrate a commitment to the health and safety of their workers and comply with laws regulating wages, hours and working conditions; do not use forced labour, or raw materials or finished goods produced by forced labour; and implement programs to ensure no materials come from sources that are responsible for human rights violations.

This clause is to be read in conjunction with the Health & Safety Policy of Eternal Limited.

iii. Human Rights

BFL will not use any form of child, forced, bonded, indentured or prison labour or any form of human trafficking. All work must be voluntary, and you shall be free to leave work or terminate the employment with reasonable notice, as applicable under local law and in compliance with the Company policy.

The term "child" refers to a person younger than 14 years old or such other minimum age as the local law provides in each geography. This standard does not apply to work or service of performers or recording artists or that otherwise by its nature is reasonably necessary to be procured from a child, to the extent permitted by local law (for example, a child actor/ actress).

This clause is to be read in conjunction with the Human Rights Policy of Eternal Limited

iv. Zero tolerance

- a. BFL is committed to creating a healthy and safe workplace for employees, where they can work without fear of prejudice, gender bias or sexual harassment. We have zero tolerance for harassment, intimidation or humiliation of any kind in the workplace, whether sexual, physical, verbal or psychological.
- b. Sexual harassment is a serious offence and is therefore, punishable. The objective of the Code and Sexual Harassment policy is to provide a conducive work environment and intolerance to any verbal or physical conduct of sexual nature towards any employees that harasses, disrupts, or interferes with, ones' work performance or that creates an intimidating offensive, or hostile environment.

- c. We have clear and fair disciplinary procedures, which necessarily include the employee's right to be heard.

This clause should be read in conjunction with the Prevention of Sexual Harassment Policy

v. Substance abuse and weapons

BFL has strict standards regarding substance abuse and weapons. BFL strictly prohibits use, sale, possession, or being under the influence of illegal drugs or alcohol or controlled substances while working with BFL or at BFL sponsored events, whether consumed during working hours or in the Company premises. Only designated areas shall be used for smoking.

- i. You will not possess, conceal or use weapons, including firearms, knives, clubs, ammunition, explosives or other devices that are primarily used to inflict injury (including recreational weapons, such as hunting rifles or crossbows) while on BFL property or when conducting BFL business.
- ii. Please note, it is your responsibility to report any case of substance abuse to the specified reporting channel.

4. MANAGING BFL'S INFORMATION AND ASSETS

i. Protection of confidential information

You should exercise enough safeguards and protect confidentiality of BFL's information, which includes everything from business plans, financial projections, strategy, contracts, pricing, contacts, relationships and personal information. BFL information should be shared only on a 'need-to-know' basis, that is, to the extent the information is needed to perform their job/work responsibilities.

ii. Payroll information

All compensation matters are privileged and to be kept confidential. You must ensure that information about salaries, appraisals, and bonuses are not disclosed to other people within or outside BFL.

iii. Unauthorized use of Company information

You shall not disclose or use any confidential information gained in the course of employment or association with BFL for personal gain or for the advantage of any other person. No information either formally or informally, shall be provided to the press, other publicity media, or any other external agency, except by the authorized representative. It is strictly forbidden to trade confidential information or insider's information for individual gain, or to benefit or to put BFL's interest in jeopardy.

iv. Use of BFL Assets

- i. You are responsible for protecting and taking necessary steps to prevent the theft or misuse of, or damage to BFL's assets and property. The assets include all kinds of physical assets, movable, immovable and tangible property, corporate information and intellectual property, such as inventions, copyrights, patents, trademarks and technology.
- ii. BFL's assets and property should be used only for the benefit of BFL and in the manner intended. Certain Company policies may allow additional personal use of certain assets, such as a BFL car or BFL provided phone. In using such assets, you are expected to exercise prudent judgement and avoid excessive personal use.
- iii. You are solely liable for any losses incurred by BFL in case of damage/loss/theft of these assets.
- iv. Any suspected incident of fraud, misuse or theft should be immediately reported for investigation.

v. Email, Internet and Information Systems

BFL's information technology systems constitute a critical component of our business operation and are provided for authorized business purposes only. Use of these systems must comply with our internal policy and acceptable use standards.

You may engage in reasonable incidental personal use of phone, email and the internet, as long as such usage does not:

- i. Consume a large amount of time or resources
- ii. Interfere with your work performance or that of others
- iii. Involve illegal, sexually explicit, political, discriminatory or otherwise inappropriate material
- iv. Relate to outside business interests
- v. Violate our Code or any Company policy.

While it is generally not our practice to monitor employee's use of our information systems, BFL reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of any employee's activity using BFL's email, phone, voicemail, internet and other systems, to the extent permitted by local law.

vi. Prevention of Insider Trading

Since BFL's parent company Eternal Limited is a listed organisation, it is bound by Securities and Exchange Board of India's (SEBI) Prohibition of Insider Trading Regulations.

SEBI had promulgated the SEBI (Prohibition of Insider Trading) Regulations, 2015 amended from time to time ("PIT Regulations" or "Regulations") the objective of which is to prevent Insider Trading.

You must not indulge in any form of insider trading nor assist others, including Immediate Relatives, to derive any benefit from access to and possession of Unpublished Price Sensitive Information ("UPSI"). UPSI would include any information relating to Eternal Limited or Eternal Shares which -

- a. Has not been made generally available to the public, including by means of a stock exchange disclosure or press release or other means of widespread distribution or not in the public domain;
- b. Is likely to materially impact the share price of Eternal Limited.

This may include:

- a. Financial Results
- b. Dividends
- c. Changes in capital structure
- d. Mergers, de-mergers, acquisitions, delisting, disposals, and expansion of business and such other transactions
- e. Changes in Key Managerial Personnel
- f. Any other matter as may be prescribed by the Board or Managing Director and CEO or Chief Financial Officer or Chief Investor Relations Officer (CIRO) of Eternal Limited in consultation with the Compliance Officer of Eternal Limited.

Based on your role and responsibilities in the Company, your access to UPSI and other parameters, you will be classified as Designated Person ("DP") or Non Designated Person ("Non DP"). You can check your status on our internal PIT tool.

Responsibility w.r.t Insider Trading

For Non designated persons :

- i. You can trade in Eternal Limited Shares provided all the following conditions are fulfilled:
 - a. Trading window for dealing in the securities of Eternal Limited is open as communicated by the Compliance Officer;
 - b. You are not in possession of UPSI; and
 - c. You have been tagged as Non-Designated Person in the internal PIT tool as on the date of trade
- ii. You should never deal in Eternal Shares directly or indirectly when you are in possession of UPSI or when the Eternal Trading window is closed.

For Designated persons : Kindly refer to the policy on *Code of Conduct for Prevention of Insider Trading of Eternal Limited and Code of Practices and Procedures for Fair Disclosure of UPSI of Eternal Limited in order to understand the specific guidelines that are applicable to you in regards to PIT.*

Please note that in case of any violation of the Code or the Regulations, penal action may be taken by the Company pursuant to the applicable law. Also, such action by the Company would not preclude action being taken by SEBI for any breach of the PIT Regulations.

5. RECORDS, DISCLOSURES AND AUDITS

i. Upholding Financial Integrity and Record keeping

- a. BFL shall prepare and maintain its accounts fairly in accordance with the generally accepted accounting principles, guidelines, financial accounting standards and applicable regulations from time to time. All business and financial transactions must be authorized and recorded in accordance with the delegation of authority of the Company.
- b. All books of account, financial records, reports and other financial documents of BFL must be accurate and preserved in good order and may be disposed of by the Finance Department as per Information storage, archival policy. You are expected to demonstrate integrity, professionalism and due diligence in maintaining accurate records of all financial transactions (e.g., expense reimbursement forms, disclosure forms etc).

ii. Interaction and cooperation with Auditors

Our outside auditors have a duty to review our records in a fair and accurate manner. We must cooperate with them in good faith and in accordance with the law. We must never mislead them in any manner regarding financial records, processes, controls or procedures or other matters which they may enquire about.

iii. Interaction and cooperation with Regulators

We must fully and truthfully cooperate with any examination or request for information from a regulator or law enforcement agency or other investigation consultant/ agency, if any, as appointed by the management. Only authorized representatives from the legal team will be the point of contact for any communication or flow of information to the regulator, law enforcement agency or others, if any.

6. SERVING COMMUNITIES AND SOCIETY

i. External Communication and Media

- a. BFL does not prohibit employees to use social media, however, it is recommended that you use it meticulously and responsibly, in order to avoid damaging the brand's image and reputation or disclosing any confidential information of BFL.
- b. All your communication and expression on social media should be followed by a social media disclaimer, as below, in order to give an impression that you are not speaking or posting on behalf of BFL.
 - a. All views, posts and opinions shared are my own;
 - b. All views are obviously just mine; and
 - c. All views are personal.
- c. The Company shall carefully review the Company's public disclosures, such as press release(s), financial statements, annual reports, and external website content, before they are released to the external parties (media, stock exchanges, investors, lenders, business partners and others) and public to ensure they are truthful, accurate, appropriate, and compliant with applicable laws and regulations.
- d. All inquiries or calls from any external parties should be referred to the Corporate Communications team

ii. Advertising

- a. Advertising is an essential instrument for effective brand building and communicating with all stakeholders. We strive to ensure that our advertisements are truthful, accurate and are done ethically.
- b. BFL sells products and services on its merit. Our advertisements must never misrepresent, deceive, or mislead customers. Certain countries prohibit comparative advertising, but where a reference to a competitor or its products or services is sought in the permitted countries, the comparison should be respectful, and the statement should be complete, accurate and not misleading.
- c. Our advertisements, displays, and promotions must always be appropriate and sensitive to the culture of customers and public in the country in which the advertisement is shown and should avoid political or religious remarks in advertisements that may be offensive or defamatory. BFL provides appropriate mechanisms for customer/consumers to share their feedback, queries and concerns, in order to drive continuous improvement in our products and services.
- d. In case of doubt regarding the advertisements, displays, and promotions, that it may be construed as misleading or hurt sentiments, you must seek help for guidance and clarification from the Legal team.

iii. Political activities

BFL is an apolitical organisation

BFL respects your right to engage in political activities in personal capacity, provided you do not act, or give the

impression of acting, as a representative of BFL and do it solely in your personal capacity.

You are prohibited from directly or indirectly utilizing any BFL resources for personal political activities, including but not limited to funds, facilities or any property, or the working time of any employee, except as authorized by relevant local Company policies or procedures. You must not be a part of or join an extremist's organization.

BFL's outlook towards driving social change is governed by two key principles:

- i. BFL is an apolitical organization, and has no political affiliations/ aspirations whatsoever; and
- ii. BFL cares for the society, but also strongly believes in the saying, "your opinions don't matter, your actions do".

You are prohibited from making, sharing, criticising or endorsing any politically flavoured statement on any of your social profiles. In case you post any such message you should clearly state that views are personal and not of BFL

7. INVESTIGATIONS

BFL believes that employees will act with utmost integrity, however, if at times, the Investigation team has reasonable cause to believe that employee has failed to comply with the requirements of this Code or other Company policies and procedures, they shall inform him/her of the basis for such belief and afford him/her an opportunity to explain the reasons for the same.

Employees must know:

- i. We take every concern seriously and our Investigation team (or a delegate for locally-managed or other matters) will investigate it thoroughly to determine whether it is qualified for further investigation;
- ii. If yes, the Investigation team shall conduct such investigation in a timely manner and shall submit a written report containing the findings and recommendations in the shortest time possible, not later than 90 days from the date of receipt of the concern;
- iii. The Investigation team will treat all complaints in a confidential and sensitive manner.
- iv. All investigations conducted will be concluded by way of an investigation report.

This clause should be read in conjunction with the Vigil Mechanism & Whistleblower of Eternal Limited or Prevention of Sexual harassment policy of BFL, as applicable.

i. Action For Non-observance

If the Investigation team arrives at the conclusion that the allegation has been proved, it shall recommend actions, which may include one or more of the following:

- i. Written apologies;
- ii. Warnings;
- iii. Reprimand or censure;
- iv. Withholding of promotion;
- v. Withholding of pay increments;
- vi. Termination of employment;
- vii. Recovery;
- viii. Legal action;
- ix. And any other action, the investigation team deems fit.

ii. Confidentiality

Upon the request of the complainant, the Investigation team will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

iii. Prohibition against retaliation

BFL strictly prohibits any reprisal, threats, retribution or retaliation against any employee who has in good faith reported a violation or a suspected violation of law, this Code or other policies or practices of BFL, or against any person who is assisting in any investigation or process with respect to such a violation. Any employee who retaliates against someone who has reported a violation in good faith will be disciplined, which can include termination of employment.

iv. Acting in good faith

Any good faith report, concern or complaint is fully protected by this Code, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation/ misconduct or suspected violation/ misconduct must act in good faith and have reasonable grounds for believing that the act reported indicates a violation of the Code or other policies. Any allegations that are proven to be unsubstantiated and found to be malicious in nature, will be treated as a serious disciplinary offence.

8. WAIVERS AND AMENDMENTS

No waiver and amendments of any of the provisions of this code shall be valid unless they are specifically approved by any Director of the Company.

9. VERSION HISTORY

Version	Approval date	Description
Version 1	October 16, 2025	Original Policy