

## Section 1- Compliances

### EKL-Code of Conduct

#### **EKL Mission**

- Establishing measures for sustainable growth in response to issues in mega trends of the world
- Contributing to the creation of a living environment where people (especially, farmers, women and socially vulnerable people) can live comfortably.
- Committing to the society in India & in the world by the promotion of further mechanization and providing the total solution

#### **EKL Vision**

- Escorts Kubota Limited shall promote its business in India & in the world to become the No.1 organization that is truly loved and sought after by society and employees.
- Escorts Kubota Limited shall become the total solution provider to solve the issues of society for a sustainable world.
- Escorts Kubota Limited shall become strategic hub in the world by utilizing the capability & potential of India

#### **Introduction and Purpose**

Escorts Kubota Limited also referred as EKL (“Escorts Kubota Limited” or the “Organization”) believes in conducting its business with the highest standards of ethical and professional conduct. Code of Conduct (“Code”) by Kubota group and EKL shall be the guiding document that lays down our standards of integrity, professional conduct and compliance in our dealings with internal and external stakeholders. It shall guide and guard our actions and conduct while performing our work and be the framework within which we must conduct all our business activities and take work related decisions.

The purpose of the Code is to enhance the honest, ethical and transparent business practices and processes in the organization.

The Kubota Global Identity, Kubota Charter of Action & Code of Conduct and EKL Code of Conduct should be read in conjunction with applicable regulations and existing policies and procedures of the organization.

#### **Eligibility**

The Code applies to all employees whether permanent, full time or temporary of Escorts Kubota Limited Including Trainees, (GAT/FTT /TR/MT/GET/ PGET) L00 and above grade.

All employees must comply with the letter and spirit of the Code and uphold its principles at all times.

#### **Introduction and Purpose**

##### **Responsibilities of everyone at Escorts Kubota Limited**

- Be responsible for your compliance with the Code and for maintaining a working environment of dignity and respect.
- Always act in an honest, professional, and ethical manner when representing Escorts Kubota Limited or acting on its behalf.
- Comply with the Code and our values, the Escorts Kubota Way
  - a) Read and understand the spirit of the Code and other policies relevant to your role in the Organization.
  - b) Seek help if you are unsure whether your actions or decisions are consistent with the Code and the values of the Organization.

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- Consider your actions and seek guidance
- Whenever in doubt about certain conduct, behavior or decisions ask yourself:
  - a) Is it ethical?
  - b) Is it lawful?
  - c) Does it feel right?

If the answer to any of these questions is “No” stop and re-consider your decisions.

- If you are still uncertain about your decision, seek guidance. You can ask questions and seek help from any of the following-
  - a) First point of contact-Your reporting manager
  - b) Next point of contact-Human Resource Department.
  - c) For escalation of serious issues as described in the whistleblowing policy-Ethics Committee.

### Report Violation

- Proactively report any violation of the Code that comes to your knowledge
- Be aware of the available resources for reporting misconduct or violation of the Code
- Co-operate with the management authority to investigate the reported concern

### **Additional Responsibilities of Managers**

- Be a role model of the Code and promote a culture of compliance.
- Personally set examples of high standards of integrity and professional behavior
- Communicate the importance of compliance to the Code and explain its applicability to the daily work of all those who work with you.
- Promptly act on the concerns related to the non-Compliance of the Code and direct it to the right channel of redressal as required.
- Create an open work culture where employees and associates feel comfortable to raise concerns.

### **Regulatory Compliances**

#### OUR PRINCIPLES

##### ❖ **Compliance with Applicable law and Statues**

- We comply with all the applicable laws and regulations in each and every territory and jurisdiction where we conduct business operations. We follow fair business practices and strictly prohibit our employees to engage in any form of unlawful conduct, corrupt or misleading business practice.

##### ❖ **Compliance with Competition Laws**

- We believe in fair business practices and market-driven competitors and strive to do business with the highest standards of trust and integrity. We do not engage in any restrictive trade practices and unlawful anti-competitive agreements. We avoid contracts with competitors that could create the appearance of improper business arrangements and seek consultations with Litigation and IPR team if there are any concerns.
- All employees must read and comply with the “Competition Compliance Policy” of EKL.

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#### ❖ Anti-money Laundering

- We comply with applicable anti-money laundering laws and exercise caution to ensure that we conduct our business with reputable customers, with legitimate funds and business purpose.

**Please refer to Annexure 1 for more details.**

#### ❖ Securities and Insider Trading

- Refer to the “Code of Conduct for Prevention of Insider Trading” on website of Escorts Kubota Limited.

## Respect for Human Rights

#### ❖ Dignity and respect

- We treat all our employees with respect and dignity and provide equal opportunities for learning and growth to all those who work with us. We strive to provide a conducive work environment built on mutual respect, trust, and openness.

#### ❖ Equal opportunity and non-discrimination

- We value our diverse workforce and strive to promote fairness and equal opportunity for all those who are associated with us and those who would like to work with us. We do not discriminate on the ground of gender, age, language, cultural background, sexual orientation and gender identity, health or medical condition, religion, beliefs, physical ability, appearance, marital status, or any other ground.

#### ❖ Anti-Harassment

- We strictly prohibit harassment in any form at the workplace which might have an effect of intimidating or coercing someone through personal attack causing individual embarrassment, discomfort and emotional distress. We will take strict disciplinary action against the offender, including but not limited to suspension of the concerned employee. Managers have the responsibility to prevent harassment in their work areas and deal with the complaints of harassment promptly, fairly and in complete confidence.

#### ❖ Anti-Sexual Harassment Policy

- We are committed to providing a safe and congenial work environment that is free of any kind of harassment including sexual harassment.
- All employees must read and comply with the” Policy on Prevention of Sexual Harassment at workplace” of Escorts Kubota Limited.

#### ❖ Child & Forced Labour

- We do not employ a child in any capacity in any industrial operation under the Company’s control either directly or through contract labour as per the law of the land.
- Further, we do not, under any circumstance, make use of forced labour. We employ only those persons who want to work with us on their own free will.

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#### Business Principles

##### ❖ Conflict of Interest

- A conflict happens when an employee allows one's interests to interface with the business decisions made for the Organization. A conflict may be actual, potential, or perceived and it may include-
  - a) Engaging in a business relationship or activity with anyone who is a party to any transactions with the organization.
  - b) Making or influencing a business transaction or decisions to derive a personal benefit or a benefit for relatives, friends, or associates.
- Employees are not allowed to engage in any employment other than Escorts Kubota Limited. In case a conflict-of-interest situation arises, we must immediately disclose such conflict including but not limited to other employment or business interests to the respective Division Head and Chief Officer HR & GA.

##### ❖ Gifts and Hospitality

- Escorts Kubota Limited explicitly prohibits all employees from offering or receiving gifts including meals, lodging, or any other hospitality made to influence actions or decisions or where acceptance of gifts could create the appearance of a conflict of interest.
- In all circumstances, the recipient of a gift shall make a declaration with the description, estimated value, and the circumstances or occasion of the gifts along with the particulars of the donor to [codeofconduct@escortskubota.com](mailto:codeofconduct@escortskubota.com).
- All employees must read and comply with the "Gifts and Hospitality Policy" of Escorts Kubota Limited.

##### ❖ Honest Ethical conduct and Anti-fraud

- We believe in fair and transparent business practices and expect our employees to be honest and ethical in their conduct and not deceive the Organization or engage in any fraudulent activity.

##### ❖ Financial books, records and audit

- We prepare and maintain our book of accounts fairly and accurately in accordance with generally accepted accounting principles and financial reporting standards. It is our duty to ensure that our financial reports accurately reflect the true picture of the Company's business transactions. Any wilful misrepresentation of Company reports and data including information such as databases, sales numbers, price list etc. shall be regarded as a violation of the Code.
- All Company records and transactions must be preserved as per the Company policy. Our financial reports shall be made accessible to internal or external auditors of the Company, other authorized parties and Government agencies in compliance with the statutory requirement.

##### ❖ Political and extra-curricular activities

- We recognize the interests and rights of our employees to participate personally in political activities and extracurricular activities such as public service, membership of social organization, sports etc. However, involvement in such activities should not represent the Company, interfere with the

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employee's performance at work or be in conflict with or prejudicial to the Company.

#### Working with Our Stakeholders & Channel Partners

##### ❖ Customers

- We value our customers and strive to deliver the best products and services that meets all applicable laws and quality standards. We must ensure that our dealings with our customers is professional, fair and transparent at all times.

##### ❖ Vendors & Channel Partners

- We shall treat all our vendors and other channel partners associated with us in an ethical, fair and lawful manner and strive to create a conducive work environment for them. Similarly, we also expect our vendors and channel partners to respect our values and conform to our professional and ethical standards.

##### ❖ Shareholders

- We shall inform our shareholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with the applicable laws and shareholder agreements.

##### ❖ Government

- We shall maintain highest standard of transparency and integrity in dealing with the Government. We shall treat regulators with honesty, courtesy and respect at all times. We do not offer, promise to offer or give any money or other benefits to Government officials for the purpose of gaining illegal benefits in the course of business.

#### Safeguarding Entrusted Information

##### ❖ Confidentiality of information

- We have the obligation to maintain the confidentiality of the information entrusted to us as part of our role with the Company with utmost secrecy and in the strictest confidence and trust. The confidentiality obligation continues to be valid and binding even after cessation of employment or contract with the Company.

##### ❖ Cyber Threat

- We shall protect electronic information that we obtain during the course of our employment with the Company against cyber risks, in compliance with applicable information security laws.

##### ❖ Data Privacy

- We have the responsibility to protect personal information entrusted to us by our employees, customers, channel partners and other stakeholders from possible loss, misuse or unauthorised access.  
All employees must read and comply with the “**Information Security Policy**” of Escorts Kubota Limited.

##### ❖ Social media usage

- We expect our employees and associates to use social media platforms wisely and responsibly. When using social media in reference to the Organization, we shall take adequate precaution to

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ensure that we do not post any information on behalf of the Organization or disclose any confidential information about the Organization.

❖ **Communication with the Media**

- All external communications and releases with the public and media in relation to Organization matters shall be done only by the authorized spokesperson of the Organization.

**Health, Safety & Environment**

❖ **Health and safety standards at Escorts Kubota**

- We value the safety of each and every individual associated with us and are committed to high standards of workplace safety and protection. Each one of us has the responsibility to understand and comply with the applicable laws, safety, health standards and guidelines required for our role with the Company.

❖ **Substance Abuse and Weapons**

- We strictly prohibit any person from entering the Organization premises under the influence of or in possession of any intoxicating substance (including alcohol) or any illegal drugs. We do not permit any person in possession of unauthorized weapons, illegal firearms, weapons or explosives to enter the Organization premises.

❖ **Socio-economic Environment**

- We build products and operate facilities with the required statutory permits and approvals and have controls in place that protect our people and prevent any hazardous impact on our environment. We strive to produce environment friendly products and make all efforts to help minimise adverse effect of our business operations on the environment.

**All employees must read and comply with the “Environment, Occupational, Health & Safety Policy”.**

**Raising a Concern**

• **Reporting**

- Escorts Kubota Limited promotes an open and honest communication process and encourages all employees to promptly report any ethical concerns or any matter related to the non-compliance of the Code.
- We respect the sensitivity of each matter reported to us and treat all concerns in a confidential manner.
- We do not allow retaliation for concerns reported in good faith, regardless of whether or not the concern is ultimately substantiated.
- We review all the complaints reported to us and undertake investigation of reported violation as per Organization policy.
- All employees are expected to co-operate with the organization in the investigation of the reported matter.
- We take appropriate disciplinary action against any employee whose actions are proved to be in violation of the Code. This may include appropriate remedies where the organization has suffered a loss and including up to termination of employment.
- We take appropriate disciplinary actions for false or bogus complaints reported through the reporting channels.

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