



# Code Of Conduct

**Oath of Trust, Integrity and Respect**

## FOREWORD



With a legacy of over 100 years, Eveready is at the forefront of improving the quality of life of people through cutting-edge, portable energy and lighting solutions.

Over the years Eveready has enjoyed a strong brand value and we have crossed many exciting milestones and becoming an inseparable part of the daily lives of millions of Indians. Throughout our journey, we have sharpened our focus on meeting the evolving customer requirements persistently, adding improved and new products to our portfolio.

Our legacy brand has enhanced its respect, reach and recall and we have strived to ensure our competencies equal the best in the world.

This consistent commitment towards excellence in our product & services arises from the strong foundation built on Trust, Discipline, Ethics, Respect & Integrity.

We welcome you to this vibrant and dynamic company and hope that YOU, as our brand ambassadors, would imbibe and endorse this same principles and values of the company.

**Suvamoy Saha**  
**Managing Director**





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## 1. EVEREADY VALUES & PRINCIPLES

Eveready Industries India Limited is one of the few organizations in the country which proudly enjoys a legacy of being associated with a brand which is 115 years old, hence we must hold high regards for our values & principles which are critical components in the foundation for the company.

As employee of Eveready Industries India Ltd (EIIL) you are expected to act in a responsible manner with display of appropriate integrity & highest level of ethical standards. You are expected to uphold and protect the Company's reputation and be fair and respectful in dealing with internal & external stakeholders and set examples within the Company.

Trust in the brand is crucial for success & growth

Adhering to Consistency and Excellence in Performance as well as Quality of Product & Services is essential to retain the position of being one of the top valued brands of the country.

Integrity in dealing with internal & external stakeholders build the foundation of a long-standing loyalty towards the brand & the company.



# EMPLOYEE VALUE PROPOSITION (EVP)



## Growth

A culture that provides opportunities for career growth across all businesses.



## Transparency & Empowerment

An ecosystem that provides employees clarity of roles, enables & encourages decision making, ensures alignment to organisation & facilitates them to succeed.



## Meritocracy

A culture of encouraging & supporting meritocracy wherein, the advancement & rewards are based on performance & merit, through a fair & transparent process.



## Learning, Innovation

Vibrant Learning Environment to help employees unleash their full potential, an organisation that provides challenging roles, assignments & projects that ensure scope for innovation & creativity. Climate that encourages out-of-the-box thinking.



## Trust & Respect

People are treated with Dignity & respect irrespective of their roles.



## Diversity

An inclusive work environment that promotes diversity of culture, ethnicity, gender, nationality, religion, caste, age and Ideas.



## Caring, Well Being

An organisation that cares for its employees and their families - is beside the employee during critical times and is concerned about employee health, safety and well being.

## 2. SCOPE AND COVERAGE



This code of conduct acts as guideline for employees which narrates how employees are required to behave and act. All employees are our brand ambassadors hence their wrong actions and behaviour reflects poorly on the company.

This document will cover the appropriate behavior with:

- 1) Employees: Both on roll & Off role
- 2) External Stake Holders and value partners in every channel & process.
- 3) Our Customers
- 4) Our External community and environment

Important Definitions:

**Employee:** Any person engaged with the company directly or indirectly and deals with internal or external stake holders irrespective of level or grade.

**Vendor:** Any supplier, vendor, logistics & distribution partners, wholesaler, retainers, or any channel partner or contractor or agents or consultants who is in business with the company.

**Internal Stakeholder:** All internal employees who are required to be dealt with a part of the job & could be inter-department or intra-department staff.

### 3. PLEDGE - EMPLOYEES



#### 3. Equal Opportunity Employer

Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation, promotion and growth to interpersonal relations. We disapprove any kind of discriminatory behaviour, harassment or victimization on the basis of caste, creed, colour, religion, gender, disability. There should not be any biasness towards any employee or group of employees. We encourage and promote diversity and equality

#### 4. Bribes & Favours for Personal Benefit

Employees shall not make any secret profit out of their position in the Company. If they receive information on a potential business opportunity in their official capacity they shall not use that opportunity for their own purpose. Employees should not use the powers arising out of the position they hold to directly or indirectly accept any improper payments or monetized benefits in return for favours or transactions.

#### 5. Insider Trading

Employees shall not indulge in any form of trading in shares of the Company directly or indirectly or assist others in trading by virtue of having access of price sensitive information which he or she may come across during the course of his or her work in contravention of the Company's 'Code of Conduct for Prevention of Insider Trading' which shall be deemed to be a part of this 'Code of Conduct'

#### 1. Confidentiality of Data

Employees are expected to keep confidential and not divulge directly or indirectly any information (except what is in the public domain) relating to the Company, intellectual properties including technology and business processes, business and its customers/vendors which they have become aware of in the course of their employment with the Company. They shall not also make use of such information for any purpose other than for the benefit of the Company.

#### 2. Respect for colleagues and workplace

All employees should treat their colleagues, superiors and team with respect and are expected to choose appropriate behaviour in words and action when dealing with internal & external stakeholders. Physical or verbal assault, insubordination or unprofessional decorum may warrant necessary action from the management.

Employees should use company assets including computer and communication equipment for the purpose of conduct of business and to complete their office work commitments, Employees should always try to protect company facilities and other material property /company assets from damage and vandalism. Employees shall not partake in any misrepresentation which could compromise the integrity of Company information, statements, record and correspondence.



## 7. Dual Employment & Conflict of Interest

Any employee who has any personal or family interest in a vendor, customer or competitor shall make such interest known to their immediate superiors and shall abstain from any decision-making process related to such vendor, customer or competitor. For this purpose, 'family' will mean spouse, children, brothers, sisters and parents.

No employee can pursue an additional employment while being an employee of the company nor can he be a promotor or entrepreneur while still in service.

## 8. Freedom OF Association

We understand that employees may express interested in joining associations or involving themselves in social, civic or public affairs or professional associations as an office bearer like ICAI, ICSI/NHRD etc without remuneration in their personal capacities. It should be noted that such activities should not create an actual or potential conflict with the interests of our company.

## 9. Human Rights

We do not employ children at our workplaces. We do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.

## 10. Disciplinary Action for violation of the Code of Conduct

The company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation and can include:

- Demotion
- Reprimand
- Suspension or termination for more serious offenses
- Detraction of benefits for a definite or indefinite time
- We may take legal action in cases of corruption, theft, embezzlement or other.

### Examples of Potential Conflicts of Interest

A conflict of interest, actual or potential, arises when an employee directly or indirectly:

- a) engages in any association, with anyone who is vendor or client to any business with our company;
- b) is in a position to derive an improper benefit, personally or for any family member or for any person in a close personal relationship, by making or influencing decisions relating to any transaction;
- c) conducts business on behalf of our company or is in a position to influence a decision with regard to our company with a customer where a relative or a person in close personal relationship with, has representation or is an office bearer, resulting in a personal benefit or a benefit to the relative
- d) influences decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative or a person in close personal relationship employed in our company or any of our group companies

## PLEDGE – VENDORS

### 1. Fraudulent Transactions

No monetary gifts or obligations of any sort should be accepted by any employee while dealing with external stakeholders like vendors, suppliers, service providers who is in business with the company.

As partners of the company they should exude the same values & principle as applicable to employees of the company.

### 2. Protection of Company & Proprietary Information

All external stakeholders who are in business with the company & have in their possession any information, data or some potential product design should treat the same as confidential and not disclose or share or trade the same with others .

### 3. Fairness in Dealings

All vendors must be selected upon merit and eligibility as per company practice. These external partners should not be a family or immediate relative of the employee.

The appointment of vendors and partners should be fair with proper documentation of the terms & conditions of association with the company



## PLEDGE - CUSTOMERS



### 1. Consistency of Quality

We stand committed in being in the business of providing best quality product & services to our customer. Customers would include our channel partners and distributors

We will provide the best and effective post sales services to our customers and resolve grievances raised by them.

### 2. Fairness in Trade

We do not resort to unfair trade practices and make misleading dealing which tarnish the reputation of the company and adversely impact products and services offered to customers.

All our dealings will be ethical and fair.

We shall not enter into any market dominating alliance or anti-competitive behaviour or form cartels and exchange information with competitor.

We abide by all rules and regulations applicable to the trade of our products

### 3. Dealings with Customer

Any information obtained from the customer will be used solely for the purpose of improvement in services and products of the company.

We respect the privacy of personal data of our customers and will use legally permissible routes of obtaining data and safeguarding the information received applicable in regard to the trade of our products.

Excellence in performance and superior quality of our goods and services are an integral component of our business ethics. It is the unwavering practice of this value that builds and sustains customer trust in our brand.

## PLEDGE – COMMUNITY & ENVIRONMENT

### Communities

1. As law abiding corporate citizens, we shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.
2. We will partner with the community and other stakeholders to minimise any impact that our business operations may have on the local community and the environment.

### Environment

1. We stand by safeguarding the environment & aim at reducing the carbon footprint or greenhouse gases and dangerous effluents.
2. We will strive to implement all environment friendly processes and initiatives like installing solar panels, promoting rain water harvesting and recycling of waste and hazardous materials, etc.
3. In the production and sale of our products and services, we strive for environmental sustainability and comply with all applicable laws and regulations.

