

INFO EDGE (INDIA) LTD.

SUPPLIER CODE OF CONDUCT

PURPOSE

Info Edge (India) Limited along with its wholly owned subsidiaries (“Info Edge” or “The Company”) understands that all entities and individuals who supply products, equipment, materials or provide services to Info Edge under a contract, agreement or arrangement, including agents, sub-contractors and representatives/employees of such suppliers (hereinafter referred to as “Suppliers”) are an integral part of its commercial operations and have an identity of their own. Their business practices and actions may make an impact on Info Edge and therefore requires them to adhere to certain moral and ethical principles in their business operations.

Info Edge expects all Suppliers to adhere to the principles of this Code of Conduct and its Sustainable Supply Chain Policy.

SCOPE AND APPLICABILITY

Suppliers must act with integrity and are expected to demonstrate commitment to legal, ethical, safe and fair business practices. This policy is applicable to all Suppliers. The Policy states our expectations from our Suppliers with respect to their compliances and business commitments towards environmental, social and governance best practices. Info Edge expects them to read, understand and affirm compliance to this Supplier Code of Conduct.

This code is also applicable to the employees of our Suppliers that includes their consultants, vendors, contractors, agents, intermediaries (collectively referred to as “Associates”).

ROLES AND RESPONSIBILITIES

The role lies in our commitment to follow and promote sustainable business practices and create sustainable business value for the stakeholders. The Business Responsibility and Sustainability Reporting (“BRSR”) committee will be responsible for overseeing the adherence to the policy and addressing grievances regarding violation of this policy.

ELEMENTS OF SUPPLIER CODE OF CONDUCT

1. **Labour and workplace management:**

1.1. Respect and Dignity

Suppliers are expected to treat their Associates with respect and dignity. They shall ensure that their workplace is free of physical, sexual, psychological, or verbal harassment and is in adherence to Prevention of Sexual Harassment (POSH) Act.

1.2. Non-Discrimination

Suppliers are expected to offer equal opportunity to their Associates and encourage them to work in an environment that is free from discrimination and harassment. They shall treat their Associates fairly and shall not discriminate based on age, gender, race, colour, national origin, political opinion etc.

1.3. Child or Forced labour

Suppliers are expected to follow applicable laws against child labour, including those relating to minimum age limits. They shall under no circumstances use forced labour (including trafficked, indentured, or bonded labour) or associate with their suppliers and subcontractors, using child labour or forced labour. Suppliers and their Associates shall be compliant with all laws, rules, regulations, ordinances, and codes that are applicable to the performing/providing of the deliverables and provide proof and certifications of such compliance.

This shall include:

1. The Child Labour (Prohibition and Regulation) Act, 1986
2. The Contract Labour (Regulation And Abolition) Act, 1970
3. The Bonded Labour System (Abolition) Act, 1976

1.4. Working hours and wages

We expect Suppliers to regularly monitor working hours to ensure the safety, health and welfare of their Associates. Suppliers must ensure that their Associates do not work more than the maximum working hours prescribed by the applicable laws or regulations.

Suppliers are expected to comply with all applicable wage laws and regulations including but not limited to minimum wages, duration of payment, overtime hours, equal remuneration and other elements of compensation. Suppliers must provide the components of pay structure to their Associates prior to recruitment and deductions, if any, from wages shall be made in strict compliance with the applicable laws.

This shall include:

1. Workmen's Compensation Act, 1923
2. Employees' State Insurance Act, 1948
3. Payment of Gratuity Act, 1972
4. The Payment of Wages Act, 1936
5. The Minimum Wages Act, 1948
6. Employees Provident Fund Act, 1952
7. Industrial Employment (Standing Orders) Act, 1946
8. Equal Remuneration Act, 1976
9. Maternity Benefit Act, 1961
10. The Personal Injuries (Compensation Insurance) Act, 1963
11. The Delhi Shops and Establishments Act, 1954

1.5. Freedom of Association (Collective Bargaining)

Suppliers are expected to respect the right of their Associates to exercise their lawful right of free association, participation, collective bargaining and provide access to appropriate grievance redressal mechanisms.

2. Occupational Health and safety:

Health and safety are topmost priority for us. We expect our Suppliers to maintain a safe and healthy work environment for all its Associates and visitors. We encourage our Suppliers to identify and evaluate workplace hazards including their likelihood of occurrence and work towards mitigating them.

We encourage our Suppliers to adhere to the following:

2.1) Laws and Standards

Comply with all relevant and applicable local, national & international laws and regulations with regards to occupational health and safety.

2.2) Injury & Illness

Put procedures and systems in place to prevent, manage and track occupational injury and illnesses that occur to Associates through implementing corrective measures such as providing necessary medical treatment, investigating to eliminate causes etc.

2.3) Workplace Safety & Hygiene

Identify, evaluate, and control workplace hazards like electrical accidents, exposure to dangerous chemicals, fire accidents etc. Associates must be given personal protective equipment (PPE) and training on the proper use of such equipment. In addition, conducting training programmes on health and safety measures for Associates, including specific training like mock drills etc. Associates must have safe access to water, sanitation, and hygiene at the workplace.

2.4) Emergency Preparedness and Response

Identify and plan for emergency situations and implement and train their Associates on emergency action plans including evacuation plans, alarm systems, reporting procedures for personnel, shutdown procedures and types of potential emergencies etc. In addition, training must be conducted when new associates are hired, new equipment, materials, or processes are introduced and when the procedures are updated or revised.

Info edge expects its Suppliers to manage business continuity risk in terms of ensuring availability of critical services during a disaster event. Therefore, we expect our Suppliers to have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis-situation, natural disaster, or terrorist/security related event.

2.5) Grievance Mechanism

Suppliers should have a process through which Associates can raise workplace concerns without fear of retaliation. This grievance mechanism should be transparent and understandable to workers and should ensure the protection of whistle-blowers.

3. Protection of the Environment:

As part of our commitment to create a sustainable supply chain, Suppliers are expected to provide products or services to Info Edge and to conduct their business operations in a way that protects and sustains the environment. They are expected to obtain and maintain all required environmental permits, authorizations, and registrations, keep them up to date and comply with their operational and reporting requirements.

3.1. Energy Efficiency and Greenhouse Gas Emissions

We encourage our Suppliers to look for ways to improve energy efficiency, minimize energy consumption, increase use of renewable energy resources, and mitigate greenhouse gas emissions. They are expected to consider climate impacts that are the result of their own operations and supply chain.

3.2. Waste management

Suppliers are encouraged to participate in this process of waste management and ensure reuse, recycling and the responsible disposal of waste generated in its operation.

3.3. Chemical and Hazardous material

Suppliers are expected to ensure that chemicals and other materials that pose a risk to human health and the environment are recognized, safely handled, transported, stored, recycled, reused, or disposed as per the applicable guidelines of local or central regulatory authorities.

3.4. Water Management

Suppliers are encouraged to undertake efficient water conservation and management measures in their systems and processes. All wastewaters shall be monitored, controlled and treated as required by the local or international law prior to discharge.

3.5. Air Emissions

Suppliers are expected to identify, monitor, control and treat air emissions generated from operations as required by law.

3.6. Plastic Waste Management

Suppliers shall comply with all the applicable guidelines covered under Plastic waste management act/rules of the respective region (including Extended Producer Responsibility (EPR)). They shall eliminate single-use plastic packaging from their supply chain.

3.7. Biodiversity

Suppliers are encouraged to take necessary efforts to reduce their influence on ecosystems and thus contribute towards biodiversity- preservation and restoration.

3.8. Product Stewardship

Suppliers are encouraged to develop products that are environmentally conscious, safe to use and have been developed considering the overall lifecycle impact. The product's constituents shall not contain any metals/elements/minerals that are prohibited by law.

4. Governance & Ethics:

Governance and ethics are at the core of our responsible and transparent business practices. We expect our Suppliers to adhere to the following:

- Shall act/conduct all business engagements/contracts in its complete integrity
- Should have a policy framework, supervision committee and an adequate system of checks and balances to drive aspects of sustainability into their daily business practices
- Shall comply with applicable anti-corruption laws and not engage in bribery with anyone for any reason whether dealing with government officials or the private sector in consistence with the Company's Anti-Corruption and Anti Bribery Policy
- Shall use their own intellectual property appropriately and shall not infringe on the intellectual property rights of others.

5. Information Security and Privacy Protection:

Being an Information Technology service provider (web services over the Internet), ensuring information security and privacy protection is our highest priority. Suppliers are expected to comply with applicable data protection and privacy laws and adhere to strict security guidelines, protecting it against unauthorised access or use.

6. Prohibition of Insider Trading

Suppliers who have access to non-public information about Info Edge, are not allowed to trade in Info Edge shares. In addition, they shall not induce anyone, by giving advice or in some other manner, to undertake such trading.

7. Protection of Intellectual Rights and Confidential Information

- The assets of Info Edge shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorised. These may include intangible assets such as Intellectual Property Rights, Knowhow & Technology, proprietary information, relationships with customers and suppliers, etc
- Suppliers must maintain physical and electronic security for all confidential information. Associates of Suppliers should use extreme care in protecting confidential or proprietary information of any kind. Face to face discussions should be conducted in a secure location
- If confidential information to be discussed or exchanged between Info Edge and a Supplier (s), the parties must first ensure that a confidentiality or Non-Disclosure Agreement has been signed and is being complied with
- Info Edge takes a zero-tolerance approach to our Suppliers committing or facilitating tax evasion. They are expected to have policies and procedures in place to prevent their associates from committing or facilitating tax evasion
- Suppliers should strive to avoid situations where a conflict of interest might arise or appear to occur while being associated with Info Edge. In case a relative or significant Associate of a Supplier is an associate to Info Edge (India) and is able to influence business decisions related to the Supplier. In that case the Supplier must disclose this information to BRSR Committee. Non-disclosure will be treated as a violation to this code and subsequent consequences
- Suppliers are expected to maintain the quality of products/services delivered to Info Edge, in line with the terms of contract with Info Edge and best industry practices.
- Suppliers must fully comply with applicable competition laws and regulations, such as The Competition Act, 2002, governing unfair trade practices
- Suppliers shall not make any claims, representations, or warranties on behalf of Info Edge to any third party.

COMMUNICATION OF POLICY

The Company communicates transparently all necessary and relevant information with all the relevant stakeholders regarding codes, policies and procedures pertaining to suppliers and related concerns. This Code shall be available to the relevant stakeholders and for access to the Suppliers as well.

GRIEVANCE REDRESSAL MECHANISM

Info Edge has the right to assess Supplier's alignment with the guiding principles mentioned in the Code and their performance with respect to the elements mentioned above. Audits may be carried out directly by Info Edge or through an independent third party to ensure continuous improvement in Suppliers' sustainability initiatives/Suppliers' code of conduct.

In case of any breach of the terms of this Code by the Supplier, Info Edge reserves the right to terminate all existing arrangements/contracts with that entity with immediate effect. In the event of any conflict between the terms of this Code or any other contract(s) with the Supplier, the terms of the contract shall supersede.

Corrective actions: Info Edge expects its Suppliers to engage and improve their sustainability performance to achieve the larger goal of creating a sustainable value chain. Audit reports, corrective action plan and follow up audits in case of non-compliance with any of the guiding principles mentioned may also take place.

Reporting: Suppliers are encouraged to report to Info Edge any violations/breaches or suspected violations/breaches of this Code or laws applicable to Info Edge by another Supplier, to the BRSR committee at Infoedge.BRSR@infoedge.com.

All reports of violations should be made in good faith, must have reasonable basis and shall not be based on personal bias and conjectures.