

CORPORATE ETHICS AND VALUES

- It is Pepperfry's policy to conduct its operations with the highest ethical and business standards.
- Pepperfry is committed to fulfilling its responsibilities to its customers, employees, suppliers, investors, service providers and business partners in accordance with these high standards.
- All employees are required to comply with the workplace conduct in letter and spirit, in all their dealings.

Gifting policy

1. Gifts received by employees

- No employee will accept, seek or solicit for his/her personal benefit, any gifts of monetary value exceeding INR 1,000 for the professional service rendered or business deals done on behalf of the Organisation, from existing and/or prospective constituents.
- Employees and members of their immediate families may not accept gifts from any person(s) or firm(s) who deal with the Organisation where the gift is being made in order to influence them or where acceptance of the gift could create the appearance of a conflict of interest.
- The following are included, but not limited to, under favours, gifts and or entertainment:
 - Meals
 - Lodging
 - Discounts
 - Loans
 - Cash
 - Favourable terms on any product or service
 - Services
 - Equipment
 - Prizes
 - Products
 - Transportation
 - Use of vehicles or vacation facilities
 - Stocks
 - Home improvements
 - Tickets
 - Gift Certificates
 - Accepting the opportunity to buy 'directed shares' – also called "friends and family shares" where the employee is likely to get involved in relationship with that organisation through Pepperfry
 - Any other favour, service or object not covered above, but has a potential for influencing decisions



2. Gifts paid/donated by Organisation or Employees:

- Employees should be aware that conferring any kind of benefits on any employee of another Organisation or of any Government or Governmental Agency made without such person's employer's consent or knowledge and with intent to influence such person's conduct in relation to the affairs of the employer is considered violation of law including applicable anti-bribery statutes.
- The making of seasonal gifts at holiday time will not be considered to be a violation of the gifts policy. However, cash or cash equivalents cannot be issued as gifts.
- Secret/Private commissions or other secret/private compensation or payments are not permitted and may be a criminal offense.
- Employees can extend common courtesies or ordinary social amenities generally associated with accepted business practices upon seeking approval from the HR Department if they meet the following criteria:
 - There is a specific business purpose.
 - They are of limited value, and in a form that will not be construed as a bribe or pay-off.
 - They do not violate ethical standards.
 - Public disclosure of the facts will not embarrass the Organisation or the Management or the employees.



Fair dealing

- Employees should deal fairly with customers, suppliers, competitors and employees of other companies.
- Employees should not take unfair and undue advantage of anyone through manipulation, concealment, abuse of confidential, proprietary or trade secret information, misrepresentation of material facts, or any other unfair dealing practices.