

Quantitative Objectives & Targets – Code of Conduct & Ethics Framework

The following quantitative targets have been established to strengthen governance, ethical conduct and responsible business practices across Anti-Corruption, Conflict of Interest, Fraud, AML and Privacy domains.

1. Anti-Corruption & Anti-Bribery

- Achieve 100% annual Anti-Corruption training completion for employees in high-risk functions (Procurement, Finance, Sales, SCM, QA).
- Ensure zero high-severity non-compliances identified in ethics audits, with corrective actions closed within stipulated time.

2. Conflict of Interest (COI)

- Maintain 95% annual COI declaration submission across all employees.
- Ensure 100% declaration compliance for existing & new employees in decision-making roles.
- Review and close 100% red-flag COI cases within stipulated time.

3. Fraud Risk Management

- Conduct fraud risk assessments covering procurement, finance, warehouse and supply chain.
- Ensure 100% secondary approval for all high-value financial transactions.
- Achieve zero unresolved fraud incidents at year-end.

4. Anti-Money Laundering (AML)

- Perform AML/sanctions screening for 100% of new suppliers and new customers prior to onboarding.
- Maintain ≥95% AML training completion for Finance, Procurement and Sales teams.
- Conduct annual sanctions-list review for 100% of high-risk business partners.

5. Whistleblowing & Case Management

- Close 100% of whistleblower complaints within stipulated time with documented investigations.
- Conduct half yearly ethics and whistleblowing awareness campaigns for all employees and contract workers.

6. Ethical Supply Chain & Third-Party Compliance

- Complete ethics due diligence for 100% of high-risk suppliers as per the supplier risk matrix.
- Include Anti-Corruption, COI and AML clauses in 100% of new supplier contracts.
- Conduct ethics and compliance screening for suppliers covering at least 80% of total annual spend.

Governance Note

These targets operationalize our Code of Conduct and Ethics framework by ensuring measurable performance, greater transparency, and continuous improvement in responsible business practices.



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