

## Code of Business Conduct (COBC) Policy

<b>Effective Date</b>	November 22, 2021
<b>Owner Function</b>	Human Resources
<b>Applicability</b>	All Directors, Employees (Staff & Labour), contracted workforce, interns & apprentices of the Company
<b>Valid Till</b>	Next Review
<b>SPOC for Clarifications</b>	HRBP's, Company Secretary, CHRO, CFO
<b>Version &amp; Release Date</b>	Version 2.0 & July 2023

### Our Objective

To lay out guidelines on what it means to live our core value of **“Doing What is Right”** and to have sustained ethical business conduct within and outside the organization. This Policy will help employees know the code of business conduct (CoBC) and ethical standards that they are expected to uphold while with the organization.

### Coverage of this Policy

Directors, employees & associates of Modenik Lifestyle Pvt. Ltd. (MLPL) whether permanent or temporary, interns or apprentice and whether on training and on contract. Certain portions of this Policy also apply to job applicants, external business partners, vendors & consultants.

### Our Commitment

We are committed to conducting our business with integrity, honesty, and transparency. As part of this commitment, MLPL has developed a Code of Business Conduct (COBC) that outlines the company's expectations for ethical behavior and compliance with legal and regulatory requirements. The COBC provides guidance to all employees, associates, contractors, and suppliers on how to act in accordance with our values and principles.

If you are ever unsure about what to do you should ask yourself:

- Is it legal?
- Does it feel right?
- Am I being fair and honest?
- How will I feel about it afterwards?
- How would it look on the front page of the newspaper?
- Is it aligned to our organizational values?
- Could I justify it to my family?

If you answer is **'No'** or **'I'm not sure'** to any of these questions, you should seek support from your **functional leader or HRBP**, who will be able to provide guidance and advice. For being doubly sure, you are encouraged to reach out to the Company Secretary / CHRO / CFO.

MLPL expects all employees, associates, contractors, and suppliers to comply with the COBC and to **report any suspected violations**. The company will investigate all reports and take appropriate actions to address any identified issues. By following the COBC, we can maintain our reputation as a responsible and ethical company and build trust with our employees, customer and/or consumers, stakeholders, and the broader community.

**What does COBC includes:**

### **1. Non-Discrimination and Equal Opportunity**

MLPL is committed to providing an equal opportunity workplace that is free from discrimination and harassment.

We believe Diversity, Equity & Inclusion (DEI) are essential to our business success and strive to create a workplace that values and respects all individuals regardless of their race, color, religion, national origin, age, disability, sexual orientation/ sexual preferences, gender identity, or any such characteristic.

**What does that imply for you?**

- a) **No discrimination against any job applicant** based on above mentioned characteristics.
- b) **Hiring relatives is not acceptable**. In exceptional cases it can be considered when the candidate will be hired in a different function than the existing employee and nowhere in the reporting relationship. This must be declared and approved by the functional leader & CHRO.
- c) While all hiring/engaging of employees or vendors or business partners must be on merit & credential basis, **disclosure to be given** in case of referring or someone getting hired/ engaged as candidate/vendor/business partner, in the function/organization, e.g., members of an employee's immediate family and those in a close personal relationship may be considered for employment based on their qualifications and they may be hired if such employment **should not create manager-subordinate relationship** or such hiring/engaging of such vendors **should not be in the same team/department/job area/function**.
  - If a close personal relationship exists or develops between two employees, both employees involved must bring this to the attention of their HRBP. Attempts will be made to find a suitable resolution in the form of job segregation.
- d) **Equal training and development opportunities** to be provided to each employee of the organization, basis business, functional and project-based priorities.
- e) **No favoritism** in work related decisions.
- f) **Contractors and Vendors selection** will be solely based on the organization's need, their business stability and past performance and not on any individual's needs or asks.

This policy reflects our commitment to creating an inclusive and respectful workplace for all stakeholders and we will not tolerate discrimination, harassment, or retaliation of any kind.



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## 2. Zero Tolerance towards any form of Harassment

At MLPL we aim to create a workspace which is safe for everyone and where each employee feel that they are respected as well.

MLPL's policy prohibits any conduct that creates a hostile work environment or that is otherwise offensive, threatening, or intimidating. This includes, but is not limited to, the following:

- **Physical violence or threats of violence**
- **Verbal abuse or threats**
- **Sexual Harassment**
- **Mental Harassment of any kind**

You must read the '**Prevention of Sexual Harassment (PoSH)**' policy along with this CoBC Policy.

### What does that imply for you?

- a) Always treat your Colleagues with respect.
- b) **Do not harass** a co-worker or a visitor at the workplace.
- c) **Never be derogatory or abusive.**
- d) Don't make **jokes**, use **language**, or participate in **activities** that may be **offensive to others.**
- e) Inappropriate behavior is unacceptable such as: **Getting drunk** in Official parties & **misbehaving.**
- f) **Misuse of Authority/ Power.**

You must make sure your behavior abides by this code no matter how informal you are being.

## 3. Zero Tolerance to Substance Abuse

We believe that substance abuse is a serious problem that can have a negative impact on employee & workplace safety, productivity, and morale. The commitment of fostering a safe work environment will get jeopardized, if an employee possesses, distributes, or sells drugs or comes to work or at any other place of work under the influence of drug/alcohol.

### What does that imply for you?

- a) **Never work or come to office / workplace under the influence of illegal drugs or alcohol**, or while away from the workplace on Company business during working or non-working hours.
- b) **Any use, sale or distribution of illegal substances is strictly prohibited.**



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#### 4. Zero Tolerance for Fraud and Fraudulent Activities

The Company is committed to business ethics and doing what is right, and hence works towards elimination of fraudulent practices and towards rigorous investigation of any suspected cases of fraud.

##### What does that imply for you?

- a) Taking self-initiative to comply with the Company's CoBC Policy or other standard processes.
- b) Understanding that **ignorance or unawareness of any Policy shall not be considered as an excuse.**
- c) **Never preparing / submitting / manipulating supplier quotes** with the intent of awarding contracts to another identified supplier for personal gains.
- d) **Never submitting false expense reports, claims, Tax proofs or Flexi Benefit claims.**
- e) **Never forging** or altering cheques, collection receipts, documents, bills, invoices, travel claims, salary details, pay slips.
- f) **No unauthorized handling** or reporting of transactions.
- g) **Never inflate sales numbers** by shipping inventory known to be defective or non- conforming or selling to dummy accounts or selling with the intent to take back returns or by any other means.
- h) **Never make any entry or submission related Company records or financial statements that is not accurate** and not in accordance with proper accounting standards.
- i) **Never misuse authority** to gain benefit for yourself or for others.
- j) **Never withhold information** of fraud committed on the Company.
- k) **No payments/ financial dealings from customers / consumers/ vendors/business partners** should be accepted in any form whether in cash (bank accounts/ UPI accounts/ wallets) or in kind.
- l) **Never fudge/ fake documents** for unlawful monetary gains, e.g., modifying the original bills to claim inaccurate amounts/ benefits.
- m) **Never misappropriate company's money/ assets/ products/ resources** resulting in but not limited to financial loss, loss of reputation to the company or loss of business opportunities, e.g., utilizing company's product/s without properly billing the same or taking cash or any amount that is due to the company with or without the intention of repaying the same.

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## 5. Anti-corruption and Anti-bribery

### 5A. Conduct with Business Partners and Vendors

The Companies Act, 2013 (Companies Act) provides for corporate governance and prevention of corruption and fraud in the corporate sector. The term 'fraud' has been given a broad definition and is a criminal offence under the Companies Act.

The **anti-corruption laws/rules prohibit making unlawful payment (either directly or through agencies or intermediaries)** or acting in furtherance of such an unlawful payment for the purpose of obtaining or retaining business or to influence any business decision.

#### What does that imply for you?

- a) MLPL does not give or accept gifts or bribes and strictly prohibits its employees from the same. It **does not accept nor offer or make any payment or gift to any third party**, including to government officials, to influence any business decision or obtain improper advantage or to get influenced to make any decision.
- b) **Invoices and claims must be accurate** and not contain false or misleading information.
- c) **Parties must not make or submit any false or misleading entries in the invoice, bill, and/or claim to MLPL.**
- d) **Employees must completely avoid and not take any money or engage in financial dealings** with our vendors, distributors, customer and/or consumers, retailers, business partners, at all and not under any circumstances, personal or professional, e.g., taking money from a distributor/retailer to do events of Modenik is unacceptable and will be considered as violation of this Policy.

Government officials, such as employees of government companies, public sector undertakings, departments, institutions of any government, and foreign officials, including officials of public international organizations, are included in the anti-bribery and corruption laws.

### 5B. Gifts, Entertainment & Business Courtesies

MLPL fosters a culture of appreciation and building relationships. However, it is **important that these gestures be perceived as a "token gesture of goodwill" and not as an "influence" or gratification.**

We consider **gifts, entertainment or business courtesies which could influence decision making as unacceptable practice.** MLPL discourages employees from accepting gifts or entertainment that could create the impression of improperly influencing a business decision. **Symbolic gifts of limited value, such as pens or calendars, may be accepted**, but must be reported to the reporting manager aligned with the HR function. **Appropriate officers must report such gifts to the CFO & CHRO quarterly.**

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**MLPL strictly prohibits giving money or anything of value directly or indirectly to any government official or employee in any country for the purpose of influencing the government employee or official. This prohibition includes giving money or anything of value to any third party where there is reason to believe that it will be passed on to a government employee or official. However, in offering such symbolic gifts as business courtesies, it must be ensured that offering of such gifts is not in breach of any local or international bribery laws and must not be remotely construed or interpreted as being in exchange of favors or favorable consideration.**

**What does that imply for you?**

- a) **Never ask for a gift, cash, favor, discounted products, free travel or accommodation, from an individual, group or organization that does business with the Company or is actively seeking to do business with the Company.**
- b) **Never accept a gift or favor that is offered by suppliers or dealers or competitors.**
- c) **Return inappropriate gifts with a polite note explaining the Company's Policy, unless it is in the form of a gesture like a box of sweets, flowers or dry fruits not collectively totaling to an amount more than INR 2000/-.**
- d) **Consult your HRBP or the Company Secretary/CHRO/CFO, if you are not sure if something is appropriate.**
- e) **Obtain proper approval for and properly record any donations, sponsorships, charitable contributions, gifts, and entertainment you accept from, or give to, a third party on behalf of the Company.**
- f) **Do not offer anything to a government official-directly or indirectly, in return for favorable treatment.**
- g) **Refuse to pay facilitation payments.**

## 6. Conflicts of Interest

Every employee is expected to maintain a fine equilibrium between their professional and personal dealings/interactions. As regimented as it may sound, MLPL requires its employees to maintain this balance carefully always. **All employees must keep away from situations that may result in "Conflict of Interest".**

"Conflict of interest" arises when an employee's private or personal interests creates a potential situation or actual situation that influences their ability to make objective decisions.

An employee's primary employment obligation is to the Company. **The Company's employees shall avoid entering any situation in which their personal or financial interests may conflict with those of the Company's, including related party transactions.** Employees should not place themselves in a position where they are, or appear to be, under personal obligation to any person who might benefit or seek to gain special consideration or favors resulting from the relationship. Business decisions must



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be taken on an arm's length basis, duly supported by relevant facts and justified rationale such as quality, track record, competitive pricing, etc.

**Illustrative instances that indicate Conflict of Interest:**

- a) **Hiring or recommending the hiring of a vendor/business associate/candidate** which employs a close relative or in which MLPL 's employee or his/her close relative has an influencing ownership stake or relationship.
- b) **Negotiating or dealing with vendor/service provider/ candidate** with whom the employee has personal relationship running beyond business relationship unless the relationship is disclosed, and other employees form part of such negotiation / dealing.
- c) **Participating in a decision of the Company to hire or promote a family member or relative of the employee.**
- d) Using your position in the Company to **solicit clients for a business owned or operated by a family member or relative or seeking in any way preferential treatment** in relation to the Company.
- e) **Giving preferential treatment** to relatives, personal friends, or to organizations in which the employee or his or her relatives or personal friends have an interest, financial or otherwise.
- f) **Using MLPL's assets, contacts, possessions, or other resources** to directly or indirectly start or support a private business activity, by oneself or through a close relative.
- g) **Acceptance of gift(s) or favors(s) from a vendor/business associate/candidate** by a MLPL employee or by a close relative, except where it is in the form of sweets, dry fruits, flowers, or other items of a value less than INR 2000/-, clearly displaying a gesture of goodwill.
- h) Awarding of contract(s) to a vendor/business associate in view of his/her contributions to charitable or community campaigns to which an employee is committed.
- i) **Performing services or practicing of any service externally (in the form of a consultant) for a competitor, vendor, sub-contractor, customer and/or consumer, business associate, etc.** (whether directly or indirectly), whilst employed with MLPL.
- j) Benefiting from a business opportunity, either through oneself or through a close relative that would otherwise belong to MLPL, or which is in competition with MLPL.
- k) Using MLPL 's assets, contacts, possessions, or other resources to **directly or indirectly start or support a private business activity**, by oneself or through a close relative.
- l) **Moonlighting, regular trading in the Company's shares or making investments** in the enterprises of businesspartners, competitors, associates, etc., whether directly or indirectly.

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- m) **Engaging in business ventures that conflict with our company's interests is unacceptable** and undermines the trust we place in our employees. Any potential conflict of interests **needs to be immediately reported to your Functional Leader, HRBP and CHRO.**
- n) **Financial dealing with any direct reportee, any team member** within the reporting hierarchy or with any colleague or family members of the employee where there is even a remote possibility of *quid-pro-quo* (an agreement between two or more parties/individuals in which there is a reciprocal exchange of favors/goods/services), e.g., **reporting manager borrowing/ taking money** from the subordinate as it may lead to obligation to the former.
- o) Using **official tours to achieve personal agenda** or disguising an official travel for personal use / purposes / activities.

Identifying or recognizing a "Conflict of Interest" situation, very often requires a sensitive conscience and good judgment; especially when the "Conflict of Interest" arises from "indirect" influence(s) or relationship(s). Very often, private, and personal interpretations/perspectives may cloud a person's objectivity.

**Each of us must do the following:**

- a) Disclose to their **Functional Head, HRBP and CHRO** if:
  - i. You acquire 2% or more shares of a publicly traded company that competes with MLPL.
  - ii. You participate in the ownership or management of private companies, partnerships, or sole proprietary concerns that compete or are associated with MLPL's business interests.
  - iii. You have any **existing investment** in any business with conflicting business interests. **(Any new investment in business with conflicting business interest needs prior approval of Functional Leader, HRBP and CHRO.)**
  - iv. **Your family member(s)/relative(s) is/are engaged in any business ventures with conflicting business interests.**
- b) Analyze objectively, the situations of "Conflict of Interest" which he/she is called upon to approve and record reasons for approving/disallowing the transaction(s).
- c) Give prime importance to factors like materiality of financial impact, integrity, and decision-making powers of the concerned employee, whilst taking a decision.
- d) Seek clarifications. Should a Functional Manager or Leader be involved in a similar situation, he/she should seek clarifications/approval from their Reporting Authority and inform the CHRO and the CFO.

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It is recommended that employees keep a safe distance from transactions /situations that may even remotely be perceived as a “Conflict of Interest” and distance themselves from being a part of the decision-making process.

## 7. Health and Safety at Workplace

We believe that a healthy employee means a healthy organization. We want to provide a safe and healthy work environment for all employees and stakeholders.

As a company we comply with all applicable health and safety laws and regulations. **Our commitment is to prevent work-related injuries and illnesses and continuously improve health and safety performance**, which means that employees have a responsibility to take necessary precautions to ensure their own safety and the safety of their colleagues and stakeholders.

**What does that imply for you?**

- a) **Report any potential hazards** or unsafe working conditions to the supervisor.
- b) **Use personal protective equipment (PPE) when required** and properly maintain it.
- c) Follow **safe work practices** and procedures.
- d) Do not engage yourself in any behavior that could put yourselves or others in danger.
- e) **Avoid taking shortcuts** or bypass safety protocols.
- f) **Tampering with equipment or safety devices is strictly prohibited.**

## 8. Non- Engagement with Child Labor

We prohibit the use of any form of child or involuntary labor. We abide by all local employment laws related to the minimum age and do not tolerate underage child labor.

**What does that imply for you?**

- a) **Business partners, vendors and/or their representatives shall not employ or contract for any form of work from any individual under the age of 18** or the applicable minimum legal age in the countries in which they operate, unless for the purposes of vocational and/or formal and structured apprenticeship, internship, or educational and training programs

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## 9. Handling Company's assets

We have categorized our assets into 4 categories:

<b>Physical assets</b>	Office furnishings, equipment's, machineries, and supplies, etc.
<b>Technology assets</b>	Computer, laptop, landline or mobile phones & electronic hardware, software, information systems, code, etc.
<b>Intellectual property</b>	Data including that related to customer and/or consumers, vendors, employees, associates, process, product, competitive analysis, catalogues, other information about products, services, and systems, etc.
<b>Financial assets</b>	Company's name, its brands, and our customer and/or consumer & consumer relationships, customer and/or consumer accounts, etc.

MLPL's assets are essential to its business operations and success. It is the responsibility of all employees and other entrusted personnel to protect these assets from unauthorized access, use, disclosure, or modification.

### What does that imply for you?

- a) **Do not use the Company's assets for personal activities** unless it has been authorized.
- b) **Never use Company's Computers or equipment's for outside businesses or for illegal or unethical activities** such as gambling, having inappropriate content or other offensive activities.
- c) **Do all you can to keep information secure.** This includes not sharing private or confidential information with other employees, consultants, or any outsider unless they need it to perform their work. In such cases, information to be shared with required approval from reporting manager.
- d) **Never release information about customer and/or consumers or colleagues** to Third parties outside of Modenik.
- e) **Never disclose any information about the Company** that is not already in the public domain without the proper authority to do so.
- f) **Never disclose any confidential data** while you represent the organization in any forum without any authorization.
- g) **Photographing, videotaping or audio recording employees without their awareness** and consent is prohibited as that may jeopardize their privacy and violate applicable law.

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## 10. Business Travel

MLPL is a company with presence throughout India, and for the same reason, there will be business visits as well.

The company expects the employee to travel expeditiously and comfortably to meet business needs. It is also expected that the employee to adhere to the travel and telecommunication policy and to be conscious of the cost to the company to avoid wasteful expenses.

Employees are expected to use their good judgment and discretion to determine the best course of action for specific situations during their official travel. This means that employees should be aware of the risks associated with travel and take steps to mitigate those risks.

### What does that imply for you?

- a) **You must not claim reimbursement on behalf of another employee** unless it is for a shared room or meal.
- b) **You must not falsify any records** or engage in submitting false claims or bills/invoices pertaining to your travel.
- c) **Ensure that all travel and entertainment expenses are supported by actual receipts** and have a valid business purpose.
- d) During your travel, do not engage in any activity which will question the credibility of the organization.
- e) Do not wear Company Uniform or material / Brand T-shirts/ ID Card and visit inappropriate places.

## 11. Social Media Responsibility

Many of us use social media nowadays, it is a powerful tool that can be used to connect with customers and/or consumers, partners, and the public in general. However, it is important to use social media responsibly and in a way that reflects the values of MLPL.

MLPL ensures that all media inquiries are handled through proper channels and that employees understand their roles and responsibilities when interacting with the media.

**Any Company related media interaction to be routed through the HR / Corporate Communication /Marketing functions.**

### What does that imply for you?

- a) Only official MLPL spokesperson(s) are authorized to represent the company in public forums.
- b) **No one is allowed to disclose any confidential or proprietary information** without prior approval from the appropriate authorities.



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- c) Don't make any statements/comments on against and Company's behalf unless or otherwise you are authorized.

## 12. Dual Employment

Dual employment can create conflicts of interest, as employees may be tempted to use confidential information from one company to benefit another company. It can also lead to decreased productivity, as employees may be spread too thin between two jobs.

### What does that imply for you?

- a) You should not take a position or responsibility of work in any another company/organization/trust/association while still working for the company.
- b) You should not provide "freelance" service to anyone, unless it helps in your professional development & learning and is **specially agreed and approved by the Functional Leader & CHRO, in writing.**

### How are COBC violations addressed:

At Modenik Lifestyle Private Limited (MLPL), we take our commitment to providing a safe, secure, and ethical work environment very seriously. If any violation of CoBC or misconduct occurs, we will act together to address the source of the issue.

We encourage employees, associates, and external stakeholders to **highlight suspected violations and raise such potential violation matters** with their reporting manager / functional leader / HRBP or with Leadership Team members basis their level of comfort.

On receipt of a complaint or on being highlighted with a potential violation, a relevant and impartial team is formed to investigate the matter/complaint.

Post investigation and hearing relevant stakeholders and depending on the evidence & severity of the misconduct, we may take actions ranging from **verbal warnings to termination of employment / contract or legal action.**

The company stands the right to forfeit/withhold all dues payable including bonus/incentives/retirals/ Full & Final settlement as the company deems fit. The company also retains the right to report the fraudulent action to the future employer/s or share with the public at large.

As employees, we are responsible for maintaining the reputation of MLPL and its subsidiaries. If you see any misconduct, you can report it through the proper channels to your Functional Leader/reporting manager/CHRO/CFO, and we will investigate and act. We will keep things as confidential as possible and protect you from any retaliation.

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This policy should be read in conjunction with other related policies like Whistleblower Policy, Prevention of Sexual Harassment (PoSH) Policy and other HR Policies, however the CoBC Policy take primacy over others.

The Company reserves the right to review and amend this Policy or add certain elements to this Policy at any time, based on changes in Laws, Codes or Government regulations.

<b>Prepared by</b>	<b>Prepared by</b>
	
<b>Priyal Shrivastava – HR Management Trainee</b>	<b>Madhumita Paul – Legal &amp; Company Secretary</b>
<b>Reviewed by</b>	<b>Approved by</b>
	
<b>Sreeja Vijay Nair</b>	<b>Sanchayan Paul</b>
<b>Head – HRBP (Commercial Functions), Talent CoE &amp; HR Data &amp; Systems</b>	<b>Chief Human Resources Officer</b>
<b>Approved by</b>	<b>Approved by</b>
	
<b>Manish Daga</b>	<b>Sunil Sethi</b>
<b>Chief Finance Officer</b>	<b>Executive Chairman</b>



**Annexure**

**Table: Definition of Functional Leader for the purpose of this Policy**

<b>Function</b>	<b>Designation / Holder of the Functional Leadership</b>
Supply Chain excl. Manufacturing	Chief Supply Chain Officer
E-commerce, Marketing, Product & Design, Manufacturing	Chief Category & Operations Officer
Information Technology	Chief Information Officer
Human Resources	Chief Human Resources Officer
Finance	Chief Finance Officer
Sales	Chief Sales Officer
Strategy & overall across Function	Executive Chairman

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