

Code of Conduct

****Core Values:****

1. ****Audacity:****

- Believe in thinking big and taking bold risks.
- Challenge norms and innovate continuously.
- Fearlessly explore new ideas and solutions.

2. ****Bias for Action:****

- Embrace urgency to strategically solve problems.
- Initiate and drive impactful results.
- Make quick, informed decisions based on available data.

3. ****Customer First:****

- Prioritize understanding and meeting customer needs.
- Validate success through customer actions.
- Delve into customer issues and address root causes.

4. ****Integrity:****

- Strive to do what's right and uphold high ethical standards.
- Maintain honesty, transparency, and professionalism.
- Act in accordance with company's Code of Conduct.

5. ****Inclusion:****

- Value uniqueness, respect differences, and foster belonging.
- Respect diverse identities and backgrounds.
- Actively seek diverse perspectives and challenge biases.

****How We Do It:****

- ****Audacity:****

- Challenge norms and push boundaries.
- Continuously innovate and disrupt.
- Fearlessly embrace new ideas.

- ****Bias for Action:****

- Take initiative and drive impactful results.
- Make swift decisions based on available data.
- Act swiftly and strategically.

- ****Customer First:****

- Strive to understand and address customer needs.
- Measure success through customer actions.
- Solve underlying issues affecting customers.

- ****Integrity:****

- Follow company's Code of Conduct.
- Consider ethical implications in decisions.
- Be honest, transparent, and responsible.

- ****Inclusion:****

- Respect diversity in age, gender, background, etc.
- Encourage diverse viewpoints and incorporate them.
- Create an open environment, challenge biases.

****Championing Inclusion and Diversity:****

- ****Respect for Diversity:****

- Treat everyone with respect and embrace uniqueness.

- ****Foster Inclusion & Belonging:****

- Encourage diverse thoughts and create a respectful environment.

- ****Provide Support:****

- Be sensitive to individual needs and challenge stereotypes.

- ****Champion I&D:****

- Promote inclusion and diversity initiatives.

- Expand network to include diverse individuals.
- Raise awareness externally and partner for inclusion.

****MAKE IT HAPPEN:****

- Ownership and accountability.
- Collaborate across functions.
- Emphasis on timely, high-quality results.

****AIM HIGH:****

- Pursue aspirational goals.
- Take calculated risks and learn from failures.
- Challenge norms and set high benchmarks.

****GREAT TOGETHER:****

- Organizational objectives first.
- Respect diverse thoughts.
- Collective success through collaboration.

****INTEGRITY:****

- Honesty, fairness, transparency.
- Responsible for outcomes.
- Adherence to high professional standards.

****CONSUMER FIRST:****

- Delight consumers through innovation.
- Advocate for consumer needs.
- Use technology for seamless experiences.

****Purpose of the Code:****

- The Code helps guide decision-making in a diverse and evolving company.
- It promotes trust-building and outlines expected behaviors.
- Focuses on compliance with laws, regulations, and ethical practices.

****Scope of Application:****

- Applies to all Flipkart and subsidiary employees.
- Also applies to board members when acting in their capacity.
- Translated into various languages for employee understanding.

****Responsibilities of Third Parties:****

- Suppliers, vendors, and business partners expected to uphold integrity and values.
- Specific requirements outlined in Standards for Suppliers and contracts.

****Consequences of Non-Compliance:****

- Violations of the Code may lead to disciplinary actions, including termination.
- Some instances may warrant seeking waivers, which can be requested through Ethics & Compliance.

****Waivers and Disclosures:****

- Waivers may be requested for specific activities; advance contact with Ethics & Compliance is necessary.
- Waivers for executive officers or directors require approval from Walmart's Board of Directors.
- Public disclosure of waivers may be required by law.

****When to Speak Up:****

- Trust-building requires doing the right thing and raising questions or concerns.
- Seek advice from manager, HR, or Ethics & Compliance if unsure.
- Report any activity violating the Code, compliance policies, Standards for Suppliers, or the law.

****How to Speak Up:****

- Most concerns can be reported to manager, HR, Ethics & Compliance, or Legal.
- For certain issues like bribery, violations by company officers, or financial misconduct, report directly to Global Ethics & Compliance.
- Additional matters as specified by global or local policies may require direct reporting to Ethics & Compliance.

****Confidentiality and Anonymity:****

- Reports to Ethics & Compliance are treated with utmost confidentiality.
- Self-identification helps with follow-up, but anonymous reports are allowed within legal limits.

****Protection from Retaliation:****

- Flipkart strictly prohibits retaliation against those who report concerns or participate in investigations.

- Retaliation may lead to disciplinary action against the responsible employee.
- Employees who experience retaliation can contact HR or Ethics & Compliance.

****Encouraging Reporting:****

- Discouraging employees from reporting ethics concerns is prohibited and could result in disciplinary action.
- Reporting in good faith is encouraged and will not lead to trouble, even if a mistake is made.
- Deliberately reporting false information goes against company values and may result in disciplinary action.

****Investigations and Confidentiality:****

- Misconduct reports are thoroughly investigated.
- Information is shared on a need-to-know basis to protect confidentiality.
- If asked to participate in an investigation, provide honest and complete answers without discussing it with other employees.

****Making Ethical Decisions:****

- Trust is built through decisions aligned with values and taking responsibility.
- Ethical behavior means doing the right thing, even without oversight.

****Integrity in Action:****

- Understand and comply with relevant laws.
- Familiarize yourself with the company's Code and policies.
- Complete required training and acknowledge understanding of the Code.
- Prioritize Flipkart's interests over personal interests.
- Practice transparency and honesty in decision-making.
- Set an example by discussing values and the Code with colleagues.
- Seek guidance from manager, HR, Ethics & Compliance, or Legal when unsure.

****Conflicts of Interest:****

- **Prioritize Flipkart's interests over personal interests to build trust.**
- **Conflicts arise when personal interests interfere with or appear to interfere with Flipkart's work.**
- **Common areas for conflicts include outside employment, financial investments, gifts and entertainment, and personal relationships.**

****Outside Employment and Business Interests:****

- **Avoid working for competitors or using Flipkart resources for personal side businesses.**

- Do not use Flipkart resources, influence, or discounts for personal gain.
- Notify manager, HR, or Ethics & Compliance about potential conflicts.

****Financial Investments:****

- Do not invest in Flipkart suppliers if you can influence the relationship.
- Avoid substantial interests in competitors.
- Consult the Global Conflicts of Interest Policy for specifics.

****Gifts and Entertainment:****

- Decline gifts and entertainment from suppliers you work with.
- Explain the policy to new suppliers.
- Decline gifts and entertainment from government officials.
- Sampling for business purposes is allowed within reasonable limits.

****Guiding Questions:****

- Ask if a situation could influence your objectivity or appear as a conflict.
- Reach out to manager, HR, or Ethics & Compliance for advice when unsure.

****Family Relationships:****

- Do not supervise or influence the hiring, conditions of employment, or performance of family members.
- Disclose if a family member is being considered for employment in your reporting chain.

****Romantic Relationships:****

- Avoid romantic relationships with employees in your chain of command or under your influence.
- Disclose existing romantic relationships if the employee comes under your supervision due to changes.

****Close Personal Friendships:****

- Assess if close personal friendships could impact your objectivity.
- Seek guidance from manager, HR, or Ethics & Compliance to manage business situations involving close friends.

****Supplier Relationships:****

- Disclose close personal friend, family member, or romantic partner connections to suppliers you influence.
- Disclose relationships when selecting suppliers with connections to family members, friends, or partners.

****Creating Safety at Work and Shopping:****

- Prioritize safety for employees and customers to build trust and do the right thing.
- Report and address anything that could endanger health or safety.
- Halt tasks if conditions are unsafe and report concerns.
- Avoid working under the influence of alcohol or drugs.
- Use proper safety gear and follow procedures for personal protection.
- Exercise caution while operating machinery; adhere to training and safety procedures.
- Observe safe driving practices, prioritizing safety over speed.
- Report violence or threats immediately to managers or security.
- Comply with health and safety laws and company policies.

****Respecting Diversity and Inclusion:****

- Value diverse backgrounds, experiences, and opinions.
- Inclusion requires understanding and championing individuals' uniqueness.
- Diversity and inclusion foster creativity, innovation, and better customer service.

****Harassment and Discrimination:****

- Maintain a workplace free from harassment and discrimination.
- Unacceptable behavior diminishes dignity, interferes with work, or creates hostile environments.
- Retaliation against those who raise concerns is not tolerated.

****Protected Status:****

- Flipkart does not tolerate discrimination or harassment based on various protected statuses.
- Compliance with laws in all countries of operation is a priority.
- Treat others fairly and respectfully, valuing differences and listening to diverse viewpoints.
- Make hiring and promotion decisions based on qualifications and merits.
- Prevent harassment by setting appropriate behavioral expectations.
- Lead inclusively, considering how actions and comments may be perceived.
- Follow harassment and discrimination laws and company policies.

- Speak up and report harassment or discrimination to managers, HR, or Ethics & Compliance.

Here's a concise summary of the guidance provided for working the right way:

****Work and Compensation:****

- Accurately pay employees for their work and hours.
- Adhere to procedures for breaks, rest days, and overtime.
- Do not perform work without proper compensation.

****Human Rights and Labor:****

- Respect human rights and prohibit underage or forced labor.
- Care for employees to ensure good customer and community care.
- Verify eligibility and documentation for new employees.
- Collaborate only with approved suppliers and vendors adhering to Standards for Suppliers.
- Comply with labor, employment, and immigration laws and policies.
- Familiarize yourself with relevant labor and employment policies and procedures.

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Here's a concise summary of the guidance provided for protecting the environment and delivering quality healthcare:

****Protecting the Environment:****

- Operate facilities and business responsibly to uphold environmental obligations.
- Segregate and recycle materials according to market programs.
- Handle hazardous items properly and comply with hazardous materials regulations.
- Report environmental hazards or waste to management.
- Comply with environmental laws and company policies.

****Deliver Quality Healthcare:****

- Maintain professional licenses and certifications required for your role.
- Provide quality patient care and exercise sound professional judgment.
- Handle and dispense prescription medication safely and within regulations.
- Protect patient confidentiality and use patient information responsibly.
- Bill accurately for products and services, resolve billing errors, and ensure services are medically necessary.
- Comply with healthcare laws and company policies.
- Seek guidance from management, HR, or Ethics & Compliance when in doubt.
- Reach out with questions or concerns about environmental or healthcare matters.

Here's a concise summary of the guidance provided for fair competition:

****Fair Competition:****

- Achieve success through quality products and services with free and fair competition.
- Avoid anti-competitive practices that harm customers.
- Uphold fair competition for innovation, lower prices, and better quality.
- Compete independently without sharing sensitive information with competitors.
- Interact with suppliers ethically and avoid sharing confidential competitor or supplier information.
- Conduct market research properly and avoid improper acquisition of confidential information.
- Maintain honesty and accuracy in pricing, marketing, and advertising.
- Abide by sales restrictions for certain products (e.g., alcohol and tobacco).

- Seek guidance from Legal when unsure about conversations or agreements.
- Comply with competition and consumer protection laws and company policies.
- Report suspected violations of the Antitrust and Competition Law Policy to

****Never Engage in Bribery:****

- Compete fairly and honestly without resorting to bribery or corruption.
- Do not offer or accept bribes, regardless of the recipient or organization.
- Third parties representing Flipkart must not engage in bribery.
- Obtain approval from Anti-Corruption Compliance and Legal for agreements with governments or third parties.
- Follow anti-corruption laws and company policies.

****Keep Accurate Records:****

- Maintain honest and accurate financial records.
- Never falsify records or accounts.
- Follow internal processes and controls for record creation and maintenance.
- Adhere to records management and retention policies.

****Follow International Trade Rules:****

- Source, import, and export products and items properly.
- Provide accurate information for classification, valuation, and origin.
- Follow trade compliance laws and company policies.
- Adhere to sanctions laws and policies.
- Seek guidance from Ethics & Compliance or Legal before engaging in international transactions.

****Prevent Money Laundering and Consumer Fraud:****

- Collect additional customer information as required by financial products and services.
- Report suspicious transactions or behavior.
- Follow Flipkart's anti-money laundering and consumer fraud policies and procedures.
- Be aware of money laundering red flags and follow local procedures for handling and reporting suspicious activity.

****Use Data and Technology Respectfully and Ethically:****

- Respect the trust placed in us when handling technology and personal/business information.
- Clearly communicate what information is being collected and why.

- Be transparent about how collected information will be used and only use it as communicated.
- Collect only the data that is necessary and follow data retention policies.
- Safeguard personal and business information and report unauthorized access or disclosure.
- Follow data protection and privacy laws and company policies.
- Seek guidance from relevant departments for handling data and technology-related questions.

****Source Responsibly:****

- Familiarize yourself with Flipkart's Standards for Suppliers and ensure compliance.
- Collaborate with suppliers who meet Responsible Sourcing Compliance program requirements and uphold legal, industry, and company standards.
- Hold suppliers accountable by ensuring they disclose factories, submit audits on time, and address non-compliances.
- Adhere to Flipkart's responsible sourcing policy and follow relevant procedures.
- Report any suspicions of suppliers or factories not meeting standards to Ethics & Compliance.

****Protect Our Property:****

- Use Flipkart property responsibly, and safeguard it against loss, theft, damage, misuse, or waste.
- Exercise good stewardship and wise use of resources and funds to support business objectives.
- Obtain necessary approvals before incurring expenses and protect intellectual property created as part of your job.
- Report any misuse of Flipkart property to your manager, HR, or Ethics & Compliance.

****Don't Misuse Inside Information:****

- Do not trade on inside information, which is non-public information that could affect Walmart's, Flipkart's, or business partners' stock prices.
- Comply with U.S. securities laws and refrain from buying or selling shares based on non-public information.
- Share inside information only with employees who need it for their roles.
- Do not share insider tips with anyone, even family members or friends, and be cautious when discussing inside information to avoid inadvertent disclosure.