



MEI Code of Conduct

The MEI Code of Conduct is the ethical roadmap pointing all members of MEI in the right direction on the corporate path. All new employees shall be provided a copy of the MEI Code of Conduct and become accountable for adhering to all the provisions laid out therein.

Every employee is expected to conduct business with integrity, in compliance with applicable laws, and in a manner that excludes considerations of unfair direct or indirect personal advantage or gains.

Financial / Assets

- We are committed to enhancing shareholder value and complying with laws and regulations that govern shareholder rights.
- We shall inform our financial stakeholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable law and agreements.
- Every employee shall be responsible for all Company funds over which he or she exercises control. Company funds must be used judiciously and only for business purposes, ensuring that the Company receives good value for the funds thus spent, with accurate and timely record keeping.
- MEI Code of conduct mandates fairness in accounting by all employees. Any willful material misrepresentation or misinformation regarding financial accounts is a violation of the MEI code of conduct, and shall invite appropriate civil or criminal action under relevant laws.
- No employee shall make, authorize, abet or collude in an improper payment, unlawful commission or bribing.
- Protecting the Company assets is a key responsibility of every employee. Care should be taken to ensure that assets are not misused, misappropriated. Employees shall not use Company assets for personal use, nor shall they allow any other person to use Company assets.

Gifts and Donations

- MEI and its employees shall neither receive nor offer, directly or indirectly, any illegal payments, remuneration, gifts, donations, or comparable benefits that are intended to obtain uncompetitive favors for the conduct of its business.
- However, MEI and its employees may, with full disclosure, accept and offer nominal gifts from business associates, with monetary value not exceeding Rs. 500/-, and provided such gifts are customarily given and/or are of a commemorative nature. In case of any doubt regarding the suitability of such gifts, the immediate superior or HR Head must be notified and consulted.





Government Agencies

- MEI employees shall not, unless mandated under applicable laws, offer any Company funds or property as donation to any government agency or its representative, to obtain any favorable performance of official duties.
- MEI shall comply with government procurement regulations and shall be transparent in all its dealing with government agencies.
- MEI shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud and corruption.



Ethical Standards

- MEI employees shall exhibit culturally appropriate conduct in the countries they operate in, and act with professionalism, honesty and integrity, conforming to high moral and ethical standards.
- MEI employees shall preserve the human rights of every individual and the community, and shall strive to honor commitments.
- Every employee shall be responsible for the implementation of and compliance with the MEI code of conduct in his/her environment.
- Failure to adhere to the MEI code of conduct could attract severe consequences, including termination of employment.



Regulatory Compliance

- Employees of MEI, in their business conduct, shall comply with all applicable laws and regulations of the territories in which they operate. If the ethical and professional standards of such regulations fall below those of the MEI code of conduct, then the standards of the MEI code of conduct shall prevail.

Concurrent Employment

- No employee of MEI shall, without the requisite, official written approval of the company, accept employment or a position of responsibility, such as consultant or Director with any other Company.
- Outside the scope of official duties, no MEI employee shall provide freelance service to anyone, with or without remuneration.



Transfer of Service

- Every employee shall be liable to be transferred to any job or department or section of the establishment, or to any other place or business of the Company or its branch, whether existing now or which may be established at any future date within India.



Superannuation

- Every employee shall retire from his/her service of the Company on attaining the age of superannuation, which shall be on completion of 58 years of age according to the date of birth given on records at the time of appointment.



Communication to Employees

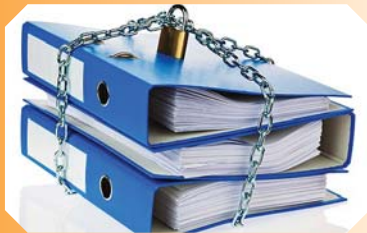
- Any notice, order, charge sheet or other communication personally served on any employee by the Company should be accepted by him / her concerned, which may be delivered to him/her personally in the premises of the establishment or sent by post / Courier to the address of the employees as specified in the service records or as otherwise furnished by him / her.





Autonomy of Association

- We recognize that MEI employees may be interested in joining or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our company.
- MEI employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.



Confidential Information

- Employees of MEI are expected not to disclose any "Confidential Information" which is defined hereunder as:
- All information and documents in any form, including but not limited to, reports, contracts, technical data, marketing details, drawings, financial information, business activities (past, present and future), know how, capabilities, pricing, costs, suppliers, customers etc. which employees have access to as part of MEI.
- Any other information which may come to the knowledge of an employee directly or indirectly during the course of dispensing his/her duties as part of MEI.
- Under no circumstances shall any such "Confidential Information" be transferred to any outside person/party by any MEI employee in the course of normal operations, without express guideline form or, the approval of the management.
- Disclosure of "Confidential Information" may lead to severe consequences, going up to the level of termination from service.

Data Authenticity

- Every employee of MEI shall ensure at all times, that the data or information furnished by him/her to the Company is true and authentic to the best to his/her knowledge.

Fair Handling of Competition

- MEI employees shall support the development of competitive open markets and promote liberalization of trade and investment. Specifically, no employee shall engage in restrictive trade practices, abuse of market dominance or similar unfair trade activities.
- MEI employees shall market the Company's products and services on their own merits and shall not make, unfair and misleading statements about competitors' products and services.
- Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.

Quality of Products & Services

- MEI is committed to supplying goods and services of world class quality standards, backed by after sales services consistent with the requirements and satisfactions of its customers.
- The quality standards of the Company's goods and services shall meet applicable national and international standards.
- MEI shall display adequate health and safety labels, caveats and other necessary information on its product packing.





Equal Opportunities Employer

- MEI shall provide equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability.
- MEI shall foster an environment which encourages diversity and inclusivity, being sensitive to cultural differences of various nationalities and ensure equality in the workplace.
- Employees of MEI shall be treated with dignity and in accordance with the MEI policy of maintaining a work environment free of all forms of harassment, whether physical, verbal, sexual or psychological.
- Employees' policies and practices shall be administered in a manner consistent with applicable laws and provisions of the MEI code of conduct, including the right to privacy and the right to be heard.
- In all matters, equal opportunities provided to those eligible and decisions are based purely on considerations of merits.

Industrial Safety



- Industrial safety is everyone's responsibility. Every MEI employee must ensure the proper application of environmental & industrial protection and industrial safety regulations in his/her working environment, under the circumstances.
- Acting not only in their individual interest, but also in the interest of their colleagues and the Company as a whole, MEI employees must constantly remind themselves to observe safety regulations consistently at all times.
- The senior management especially has an important role to play in this regard by setting the right example through correct attitude and conduct.

Media Interactions

- MEI employees should refrain from interaction/communication with the print and electronic media on matters which are likely to have an impact on the image of the Company as a whole, unless duly authorized.
- Only selected/nominated persons who are authorized to speak to the media on identifies subjects. It is important to ensure that all statements made to the media are true and fair.
- Non public information should not be disclosed selectively to a particular group. Approval of customers, vendors or other business associates must be obtained if any reference is made about them.
- Posting or discussing information concerning the Company's or business on the internet / Social media without the prior written consent of the Head of the Company is prohibited.
- Advertising must not misrepresent, or be likely to mislead the consumer, as to the character, quantity, composition or safety of the product advertised.
- Every employee is required to protect all trademarks, brand names and other proprietary material of the Company and of third parties.
- We should not disparage products or services of competitors.
- We should avoid political or religious remarks in advertisements.





Usage of Electronic Resources

- Only licensed software shall be used by all employees. Uses that threaten the integrity of the system, the privacy of others, or that are otherwise illegal, are hence forbidden.
- Employees must ensure that they regularly take back up of all important data.
- MEI management reserves the right to access and monitor all messages and files on its systems, including information regarding employee internet use, as and when deemed necessary and appropriate.
- Electronic resources shall be used in an effective, ethical and lawful manner. Users who receive or notice obscene or inappropriate messages are needed to report the same immediately to their Functional Heads or the Human Resources Department.
- MEI will not be responsible for actions of employees demand illegal with respect to the usage of electronic resources.



Reporting Violations

- All employees of MEI shall promptly report to the management when they come across any actual violation of the MEI code of conduct, or an event of misconduct, any act that is not in the Company's interest, or which could affect the business or reputation of MEI.






























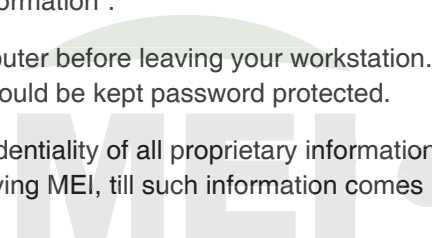
What to do?

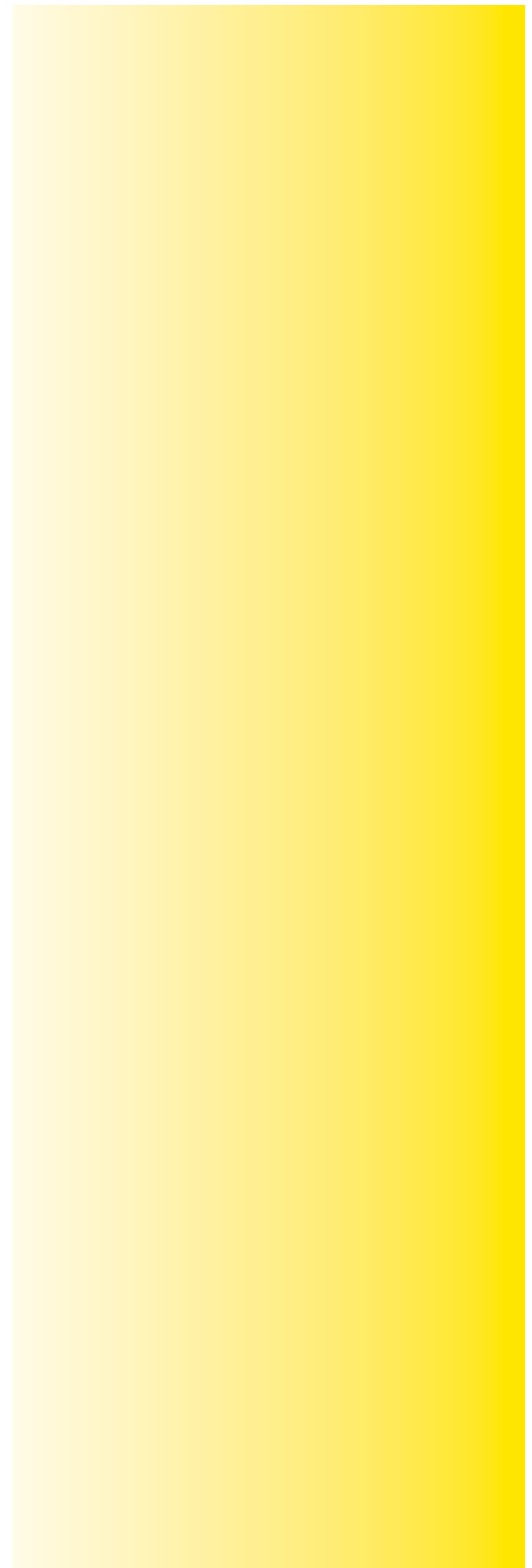


WHAT TO DO?

-  Comply with all laws and regulations while carrying out your job, both in letter and in spirit, as applicable in the regions where the Company operates, as per your area of responsibility. Ensure that you are aware of all such regulations.
-  Contact Head of HR regarding any requires on whether a particular gift is acceptable or not. Remember, when in doubt just declare.
-  Cultivate a “can do” attitude and believe in converting possibilities into realities.
-  Protect and promote the values driving the business, and stand up for the Company’s convictions.
-  Treat subordinates as individuals and encourage creative and innovative thinking, proving them the necessary freedom.
-  Build team relationship based on mutual respect and trust. Assume equal responsibility to achieve departmental objective.
-  Ensure that the workplace is lively releases positive energy so as to make it exciting and productive.
-  Maintain the standards of MEI product sold in the market, making certain that they meet all applicable statutory norms.
-  Ensure that any advertising done by MEI is accurate, honest and not misleading.
-  Adhere to all legal requirements regarding trademark rights and competitor infringement policies.
-  Recognize the importance of work life balance.
-  Appreciate the value of a diverse workforce and respect individual difference.
-  Counsel subordinates regularly and discusses with them about their work related problem and provide necessary developmental support.

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-  Prohibit any act of harassment of MEI employees, where physical, verbal, sexual or psychological.
 -  Adhere to the Whistle Blower Policy if you become aware of any misdeeds or unethical behavior on the part of anyone connected to MEI.
 -  Encourage employee participation in lawful associations for the discharge of their fundamental and constitutional rights and duties.
 -  Facilitate as superiors, the setting of objectives, clearly defining the standards of performance desired, and creating an open, fearless environment that is conducive team work.
 -  Demonstrate as subordinates, an attitude of ownership to tasks and promote team spirit and inquisitiveness for knowledge.
 -  Be punctual for all official engagements, arriving on time for work and for all official meetings.
 -  Uphold MEI's image as its brand ambassador, by conducting yourself properly in public. Dress appropriately on working days and for official / business meetings and get together, following a suitable dress code.
 -  Company with all applicable health and safety policies to eliminate workplace hazards and provide a safe and stress free work environment for employees.
 -  Foster a culture of informality and refer to other on a first name or surname (with appropriate title) basis, whichever the employee is comfortable with, instead of addressing or referring to the person by designation.
 -  Employ MEI's tangible, intangible and IT assets only for conducting the business for which they are duly authorized, other than those provided as benefits. They should not be used for any personal/outside work.
 -  Tangible assets include equipment and machinery, facilities, transports, raw materials, unfinished product, unsold inventory, office space, corporate credit cards, etc.

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- 👍 Intangible assets including proprietary information, trade secrets, goodwill, customer and supplier relationship, IPR etc.
 - 👍 IT assets including all personal computers, laptops, network servers and all other associated computer hardware and software technologies, voice mail and internet access, etc. that is owned, leased or rented by MEI.
 - 👍 Adhere to statutory norms as defined in the SH&E policy.
 - 👍 Maintain the confidentiality of all proprietary information and trade secrets, whether patented or not, that gives MEI an opportunity to obtain an advantage over competitors.
 - 👍 Maintain confidential documents clearly marking “Confidential – MEI Proprietary information”.
 - 👍 Lock the computer before leaving your workstation. Confidential Information should be kept password protected.
 - 👍 Maintain confidentiality of all proprietary information or trade secrets, even after leaving MEI, till such information comes into the public domain.


















**What Not
to do?**



WHAT NOT TO DO?

-  Infringe upon the trade secrets, intellectual property rights and proprietary and confidential information of competition.
-  Employ unfair practices to obtain data about competitor activities or strategies.
-  Submit faulty expense claims to avail of benefits.
-  Stop striving for higher levels of excellence in all areas of work.
-  Arrive late for duty.
-  Promote all MEI advertisements in the media that have anti-social or anti-national undercurrents.
-  Promote hierarchical differences as hindrances for open communication.
-  Use threatening or demeaning language.
-  Use MEI's IT or communication assets for promoting discriminatory, offensive, defamatory or threatening messages or downloading and viewing pornographic material, or for sharing MEI's confidential and proprietary information, trade secrets, IPR, etc.
-  Destroy information belonging to MEI or carry MEI's proprietary assets, training provided by the Company, software installations or packages and any other such material at the time of terminating employment with MEI.
-  Cause security breaches in computers, networks, websites and other hardware and software applications.
-  Use unauthorized software at any time.
-  Discuss any confidential information with other within or outside the organization.
-  Discuss MEI's proprietary information with family members, relatives or social acquaintances.
-  Take part in any survey, data collection or benchmarking exercise which requires disclosure of any Company related information without the approval of the function/SBU Head.
-  Leave documents and other material unattended in conference rooms.
-  Share your computer password with others.



Governance Mechanism

- The company expects voluntary compliance to the MEI code of conduct by all the employees.
- The company encourages all employees to help enforce the MEI code of conduct adequately and report any violation to the code of conduct Governance Committee.
- Any action by an employee, which violates the code of conduct or causes conflict of interest shall be deemed as an act of misconduct and would be liable to disciplinary action.



Governance Committee

- All MEI employees have the right to report any non-compliance of the MEI code of conduct to the Governance Committee as constituted by the COO / MD.



Adoption and Acceptance

- All employees should adopt and accept the MEI code of conduct with immediate effect.
- All the employees (Staff/Executives/Managers/Senior Management) of MEI are required to sign the acceptance letter of the MEI code of conduct as given in the Annexure, and hand over the same to the HR Department.



Consequence of Non-Compliance

- Any employee who is found to be responsible for the violation of or non-compliance to the MEI code of conduct will be subjected to severe action including termination from the services.
- The report of non-compliance by any employee against another employee at any level will be treated confidentially and the actions taken will be reported back to the employee who communicates the non-compliance.





MISDEMEANORS

- a) Insubordination or disobedience.
- b) Damage due to negligence or carelessness towards work, process or any property or intellectual property of the Company.
- c) Theft, fraud or dishonestly in connection with MEI's business or property.
- d) Taking or giving of bribes or any illegal gratification whatsoever.
- e) Divulging any Confidential Information.
- f) Habitual breach of any MEI code of conduct.
- g) Collection of any money within the premises of the Company for purposes not approved by the Company.
- h) Engaging in trade of any kind within the Company premises.
- i) Trading on occupation; carrying out private jobs in the Company.
- j) Undertaking employment with any other employer in any capacity without the permission of the Company.
- k) Failure to observe duly notified safety instructions or interference with any safety device or equipment installed within the Company.
- l) Threatening, abusing, intimidating or assaulting any officer / employee of MEI inside or outside the premises of the Company.

- m) Disclosing to any person trade information with regard to the working or processes in MEI without prior permission of the Management.
- n) Interfering with machines / design / process / product / IT infrastructure.
- o) Convection by any code of law for any criminal offence or act involving moral turpitude.
- p) Conduct in private life calculated to injure the reputation of the Management or the Company or bring it into disrepute.
- q) Misuse of Company resources, IT infrastructure and intellectual property.
- r) Deliberately making false, vicious or malicious statements, public or otherwise, against MEI or any officer or employee of the Company.

Penal Action for Misdemeanors

An employee found guilty of any Misdemeanors will be liable for appropriate disciplinary action which includes:

- a) Dismissal from service
- b) Demotion
- c) Withholding of increment
- d) Legal actions, either criminal or civil, initiated against him/her and/or
- e) Recovery of money





Governance Procedure

Once a prima facie case is made out against the employee's the code of conduct Governance Committee shall issue a show-cause notice mentioning the gist of the case with the misdemeanor to the delinquent employee's asking for an explanation within the time stipulated therein. Upon reply or otherwise, the code of conduct Governance Committee will decide the matter on its merit, considering the principles of natural justice, with an unbiased approach.

The unanimous decision / finding of the code of conduct Governance Committee shall be final and the same shall be recommended to the management of the Company to take necessary disciplinary action as it may deem fit.

Any waivers from the MEI code of conduct should be approved by the Managing Director or a person nominated by him.

