



**CODE
OF
ETHICS**

TOWARDS A SHARED VISION OF
BUSINESS ETHICS, PROFESSIONAL PRACTICES
& EMPLOYEE CONDUCT



Great
Mid-size
Workplaces

Great
Place
To
Work

INDIA
2025

“ Laws control
the lesser man.
Right conduct
controls the
greater one. **”**

- Chinese Proverb

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EVERY unit in our society, whether a small family or a large community, has its own guidelines on conduct, which define the way in which the group expects its members to behave. These are unwritten codes and rules, but because one grows up with them, they are somehow absorbed, understood and usually followed.

The result is minimal discord and confusion.

An organisation needs a similar common understanding among its members. After all, when people come from different cultural, linguistic, geographical and professional backgrounds, the accepted way of doing things isn't necessarily clear or obvious.

WHY A CODE OF ETHICS?

A Code of Conduct spells out the ground rules. It specifies how the organisation expects its employees to behave, what kind of behavior it considers acceptable or unacceptable, the kind of business practices it endorses, the values that it holds in high regard and so on. In a bigger sense, then, it is also a Code of Ethics.

Which brings us back to the question: Why a Code of Ethics? Very simply because such a code serves as a common guide to employees and decision makers in the organisation. It indicates right or wrong actions and reactions as well as repercussions of certain behavior. It also identifies the common goal and vision for an organisation and its people. It enables a healthy corporate culture and makes it possible for individuals to exercise their judgment confidently, knowing the decisions they are making are in sync with the organisation's point of view and systems of operation.



OUR
-CORE-
VALUES

Before outlining the Brigade Group's Code of Ethics, it is important to re-state the organisation's Core Values, which all employees must abide by, in their corporate life and contribution.

CORE VALUES

Brigade Group's core value system is defined as "QC-FIRST".

Each letter in this collective noun signifies an important attribute or value that Brigade Group stands for:

- Q** Quality - Do it right the first time, owning outcomes
 - C** Customer Centricity - Create positive experiences, agile to respond
 - F** Fairness - Respect individuals inclusive
 - I** Innovation - Think and do better. Make it simple
 - RS** Responsible Socially - Give back to society, reuse/recycle
 - T** Trust - Easy to do business with credibility
-



QUALITY

Do it right the first time

Strive for error free deliverables, be it documents, information or in project execution.

What it will mean:

- Check and rectify mistakes, while doing a job, since doing the same later will take longer and make one less productive
- Prevention is better than cure, putting in hard work and effort initially to avoid mistakes will save time and cost

What it will take:

- Hard work and meticulousness, be it in planning, researching or due diligence, so that your response/deliverable is complete and as per the requirement/specification. One should take pride in creating error-free work



Owning outcomes

One should take responsibility for any task assigned/given to him/her and see it through to completion.

What it will mean:

- If one notices something has gone wrong or if a customer complains about an issue to a person be it in his/her department or another, the person must take ownership and ensure that it is resolved
- One must also take responsibility for ensuring work gets done within the committed time and not blame any external (as far as possible) or internal reason for the delay

What it will take:

- Constant follow-up and persistence will be required for this to happen
- Being the single point of contact as far as possible
- Initiative to escalate when things are not moving



CUSTOMER CENTRICITY

Create positive experiences

Aim for every customer interaction to end on a positive note.

What it will mean:

- Speak and act in a positive manner, be it in writing or in action. Use positive affirmations for motivation and positive language for verbal and written communication. Have a positive attitude towards work and life in general
- Meet customer requirements as far as possible. When unable to adhere to customer requirements, respond in a polite manner giving a succinct reason for why it could not be done

What it will take:

- Sometimes things can go wrong – there can be delay in construction or snags in the apartment. In such a situation, one should try and find a way to turn a complaint or negative issue into a positive experience by finding another way to delight the customer
- Creativity and a positive attitude is required for this to happen



Agile to respond

One should be quick to respond to a customer request or enquiry, as per customer's expectation and preferred medium of communication (ideally within the same working day, if not earlier).

What it will mean:

- As the saying goes, "justice delayed is justice denied", similarly, responding after it is "too late" or long after the customer expects the response is of no use as it will create a negative impression of the company
- If one is unable to adequately address the customer's request within acceptable time frame, then one should inform the customer that a response will be given within a certain period, post enquiry (specify time period)

What it will take:

- Sincerity to the job is required for this to happen



FAIRNESS

Respect individuals

Speak and act in a professional manner to all – irrespective of position, grade, age or gender. Professionalism and politeness should be a part of our work culture.

What it will mean:

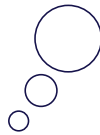
- Follow the golden rule - Treat people like how you would like to be treated, whether it is a customer or vendor or support staff
- Criticise the work not the person

What it will take:

- There are 2 sides to every story. Get the full picture before you begin to criticise / find fault
- Praise in public, chastise in private
- Be firm but polite

INNOVATION

Think and do better



Find ways to improve efficiency/productivity.

What does it mean:

- Question how “things have always been done”, question status quo
- Determine how existing products and processes can be improved
- Analyse how costs and efficiency / productivity can be optimised
- Find ways to save time / speed up progress and increase revenue

What does it take:

- Curiosity and “out-of-the-box” thinking is required for this to happen



Make it simple

Constantly look at ways to simplify existing systems and processes.

What does it mean:

- Follow the KISS management principle – “keep it short & simple” - the KISS principle states that most systems work best if they are kept simple rather than made complicated; therefore simplicity should be a key goal in design and unnecessary complexity should be avoided
- Question the need for different steps and see if a couple of them can be merged / simplified
- Reduce the number of layers for sign offs and approvals in every process
- Shorten process time by reducing activities that add limited or no value

What does it take:

- Clarity of what needs to be done to complete the job at hand.
-



RESPONSIBLE SOCIALLY

Give back to society

Show gratitude for the progress made in the ecosystem you operate in and look at ways you can improve the quality of life around you.

What does it mean:

- Rejuvenate lakes, plant trees, create parks, support cultural heritage, promote safety and cleanliness in society
- Developing green / environmentally friendly buildings
- Improve the quality of life for not just customers but also the surrounding community

What does it take:

- Commitment towards the environmentally friendly initiatives is required for this to happen



Reuse/recycle

Reduce consumption of resources and generation of waste from our operations.

What does it mean:

- Bring in a culture of polluting less and preserving the planet for future generations
- Reduce consumption of paper, plastic, electricity & raw materials

- Identify areas, avenues for reuse of existing material or for recycling and implement the same

What does it take:

- Conscientiousness in the utilisation of resources is required for this to happen
-

TRUST **Easy to do business with**

Make it easy for all stakeholders to do business / deal with us, making us a reference standard in the industry.

What does it mean:

- Make it easy for the customer / vendor by setting realistic expectations from the start
- KISS model for all paper work and processes related to the customer / vendor
- Provide checklists for the customer / vendor on documentation and FAQs on process
- Communicate regularly with the customer on the progress of their apartment,
- Use technology to make transacting / communicating with the customer and vendor easier

What does it take:

- Simplicity and straightforwardness in the way we do business is required for this to happen
- Finding innovative ways in making the customer's life easier

Credible

Create a brand where a commitment is taken for granted by ensuring that they are consistently met.

What does it mean:

- Be transparent in dealings and make a habit of delivering on commitments
- Ensure quality through snag free apartments
- Improve quality of finishes and consistently meet specifications and terms & conditions
- Deliver as promised and on time

What does it take:

- Integrity of one's word and in one's dealings is required for this to happen

The Brigade Code of Ethics is applicable to all companies forming part of Brigade Group, their Directors / Partners, Managerial Personnel and all other employees privileged to be working for Brigade Group.

The Board of Directors and members of Senior Management are required to subscribe to, and annually affirm, the compliance of the Board approved Code of Conduct, as prescribed in terms of SEBI Listing Regulations. These rules of conduct, being fundamental to the sustainability of the Core Values of Brigade Group, are applicable to all the employees.

SCOPE OF THE BRIGADE CODE OF ETHICS

The Directors, assisted by the Senior Management, have primary responsibility for framing policies and practices focused on areas like long-term strategies, risk management, stakeholders' relations, integrity of financial statements, human relations, standards of probity for personnel, whistle blowers and their protection, prevention of sexual harassment, confidentiality of information, prohibition of insider trading, acceptance or refusal of gifts, monitoring performance, compliances with laws & regulations and above all, guarding the reputation of Brigade Group.

The responsibility of the Directors is onerous; they have to use their independence and wisdom of judgment for the aforesaid areas to aid the progress of Brigade Group.

The Management Personnel in the positions of Heads of Departments, Group Heads and Chief of Project Teams etc. have dual components to their Roles and Responsibilities. Brigade Group accords equal weightage to both the streams:

- The first component is the responsibility for the work they have been primarily entrusted with and regarding which they are accountable to the more senior levels of management or even to the Board
- The second component relates to the development of employees working with them and the efforts made to build up their team

Formal training and on-the-job experience are usually enough to ensure employees gain work competence. But that is not enough. Managers have to make the additional effort of building up supportive, professional relationships with their teams. This could be done through interactions and conversations, a key function of which would be to explain, the need to adhere to the core values of Brigade Group and guard its reputation.

It is the primary duty of Managers to provide a vibrant and reassuring work environment, where merit and performance and nothing else, matters for career progression. In the same vein, Managers must make it clear that misrepresentation of facts and misdemeanor of any kind are not permissible.



Section 1:



YOU
— AND —
BRIGADE



Personal Conduct

Please be aware of, and sensitive to, the fact that the personal and professional aspects of life are often intertwined. As an employee of Brigade Group, your personal actions could reflect on the company. A dishonest act-like a false declaration in your passport application or some disharmony you create in the community can be interpreted as *the wrongful act of an employee of Brigade Group*. Your seniors at work may not want to take action, but as responsible employees of a responsible organisation, they will be required to make enquiries and follow disciplinary procedures if deemed necessary.



Personal Finances

Brigade Group expects all its employees to live within their means, avoiding a lifestyle that is supported by borrowings from moneylenders, colleagues or worse still from clients of Brigade Group, which can give rise to suspicion of conflict of interest. This is not intended to be a sermon, but a caution that living beyond ones means often leads to unwise compromises. Banks, for example, routinely check the transactions in the accounts of employees as it might throw up the first clues to misdemeanors.



Commission of / Abetment in Frauds

Frauds perpetrated by a fringe of society are unfortunately a reality of life. The more common examples of fraud include submission of false claims of expense, concealing of personal information, falsification of reports on performance, unauthorised handling of transactions, forging cheques, misusing of company property and parting with confidential information to unauthorised persons/competitors, to name a few. All of these, apart from being morally repugnant, are detrimental to the organisation. In Brigade Group, we have *zero tolerance for frauds*; our only action would be swift severance of employment of the person concerned.



Acceptance of Gifts and Bribes

Employees of Brigade Group are advised to consider carefully before accepting gifts, even those of very moderate value from business associates, even on customary occasions. However, token gifts like flowers, fruits, sweets and books may be accepted on festivals and special occasions. It is not impolite to decline a gift or return it with a polite message of thanks, stating Brigade Group’s internal policy does not allow acceptance of gifts. It should be obvious that acceptance of bribe is totally prohibited. Any employee charged with bribe-taking faces immediate dismissal from service.



Conflict of Interest

Anyone who works or is associated with Brigade Group, including its Directors are required to inform the organisation should a situation arise in which there is a conflict between their personal interest / association with that of a party with which Brigade Group has business dealings. Even if the tenability of conflict is in doubt, it should be disclosed and left to objective parties to decide. We may add that companies are required by law to disclose related-party transactions on the same grounds.



Insider Trading and Insider Information

Brigade Enterprises Limited, being a publicly listed company has plethora of rules, regulations and guidelines to be complied with from time to time laid out by the Securities & Exchange Board of India (SEBI), Stock Exchanges, Ministry of Corporate Affairs, Reserve Bank of India (RBI) and other Statutory Authorities. This being the case, Brigade Group needs to comply with many legal and regulatory requirements, one of which is compliance with rules regarding Prohibition of Insider Trading and Insider Information.

The Company Secretary periodically advises Directors, employee shareholders and staff, who by virtue of their roles and responsibilities have access to price sensitive information—not to buy or sell shares of the Company during certain periods: When declaration of financial results are due, before the Board Meeting when the proposal of dividend is going to be considered and so on. All employees are advised to strictly follow rules, as any leakage of sensitive information would invite very severe punishment to the company as well as the employee concerned. There is no exception to the rules on the subject. The Company Secretary is the Compliance Officer of the Company, who could be approached for any clarification on the subject of Insider Trading and Insider Information.



Confidential and Protected Information

Every employee signs a Non-disclosure Agreement while joining the company. This casts specific obligations relating to treatment of confidential information. In brief, the employee should not disclose confidential information entrusted to him / her even to his / her colleagues, except with the permission of the authorised officer. Brigade Group takes breach of trust reposed in the employee seriously and cautions against gossiping about company matters and performance.

It is expected that even if an employee leaves the company, he or she should keep the information that was entrusted to him / her in confidence. A good prospective-employer does not consider the candidate trustworthy, by any act of volunteerism in this regard. Employees are also enjoined to keep salary and compensation details confidential.



Prevention of Sexual Harassment

All employees are expected to respect the right to gender equality at the work place and refrain from any form of sexual harassment. Sexual harassment includes any unwelcome sexually determined behavior, whether directly or by implication: Physical contact, showing pornography, forwarding off-colour jokes are examples. Brigade Group has a separate policy against sexual harassment and the same can be referred to in the HRMS. Breach of the policy invites strict punishment, including severance of service.



Whistle Blowers

While the Management of Brigade Group has the primary responsibility of ensuring compliance with the Code of Ethics by all concerned, it does not detract an employee / associate / client / supplier from reporting in confidence any serious breach of company policies, especially in regard to ethics of business to the Ethics Committee. A few caveats: The information must not be frivolous. Informers need to disclose their identity and Brigade Group, in turn, will provide them full protection from any threats or harassment. The whistle blower policy for the Group is uploaded in HRMS.



Work Ethics

While some of the more obvious forms of unethical behavior have been outlined above, there is another form of unethical behavior that usually falls below the radar - work ethics. Each member of the organisation is paid to do a job. Not performing that job as a careful, diligent and responsible person would, is a breach of conduct with respect to the work ethics endorsed by Brigade Group. Employees are expected to deliver “quality” deliverables.

Work that is done with gross negligence or willful misconduct will result in disciplinary action.

Brigade Group believes in and encourages collective competence. It is only through coordination and cooperation among the various departments that we can deliver our products and services efficiently. Passing the buck gives a poor impression to customers; employees are advised to cultivate the habit of working collaboratively with colleagues and associates.



Online Etiquette

The Company has an online system to track activities and to detect misuse of the official network, like trading online for personal portfolio management or surfing pornographic websites etc., Use of the internet for non-official purposes is strictly discouraged. Please refer Brigade ISMS Policy, which details out the CIA (Confidentiality, Integrity and Availability).

Section 2:



DEALING
- WITH THE -
EXTERNAL



Professional Interactions, Appropriate Intervention

It is essential that the employees of Brigade Group maintain high standards of professionalism in their interaction with customers, suppliers, contractors, shareholders, government agencies, law enforcement authorities, banks and others. There are designated departments responsible for dealing with some of these external agencies. If, on any occasion, an external agency mistakenly approaches an employee who is not concerned with the subject, it should be directed politely to the right source. In all circumstances, due decorum must be observed, even if the other party is provocative.



Reporting Unethical Enquiries

It is not uncommon for competitors to seek confidential information and records. If an employee is approached for such a purpose, he or she is advised to inform the CMD's Office.



Avoiding Unnecessary Comment

Brigade Group believes in complying with laws of the land and strives to be scrupulous about this. However, occasionally, breach of law is alleged, sometimes with political or other motives. Senior Management is best equipped to deal with these issues; all other employees are advised to desist from commenting or gossiping about such reports.



Associating in Voluntary Work

In their spare time, employees may certainly get involved in voluntary work that supports a good cause, through an NGO or otherwise. However, it would be a good convention to keep the HR Department informed about such associations.



Promoting Environment Friendly Initiatives

Brigade Group actively follows policies aimed at protecting the environment. For instance, it is one of the first organisations in Bangalore to have adopted eco-friendly initiatives like rainwater harvesting, installing STPs and using solar lighting systems long before the same was made mandatory by the Statutory Authorities. Employees are welcome to suggest fresh ideas to preserve and protect our common environment by sending an email to suggestions@brigadegroup.com.



IN CONCLUSION . . .

In the rapidly changing business environment, Brigade Group aims to follow a path of rectitude and professionalism of the highest standard. We are aware that no policy or path endures for long, but changes necessitated by circumstances will be tested on three fundamental criteria:

**Does it
enhance customer
satisfaction?**

**Does it
add to collective
competence?**

**Does it better the
character and reputation
of Brigade Group?**

The answers that these questions generate will make our decision-making simpler and our outcomes better.



I,

Emp. No.

Designation

Company

Have read and understood the Brigade Code of Ethics as presented in this booklet.

I shall abide by the code in letter and spirit.

.....
Date



.....
Signature

CODE OF ETHICS

I,

Emp. No.

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.....

Date



.....

Signature

**“ The reputation
of a thousand years
may be determined
by the conduct of
one hour. ”**

Japanese Proverb



BRIGADE

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