

CODE OF CONDUCT POLICY

Acting with fairness, transparency, and responsibility at all times.

Policy Summary

- This Code is the basis for ethical behavior in all business dealings with customers, regulators, and communities.
- It provides guidance on MoEngage's standards of integrity and business conduct.
- It applies to all permanent and contractual employees, directors, contractors, consultants, and trainees globally.
- Principles include honest/ethical conduct, fair dealing, and ethical handling of conflicts of interest.
- We are committed to conducting business with professional competence and integrity.
- We must ensure full, fair, accurate, timely, and understandable disclosure.
- Compliance with all applicable laws, rules, and regulations is mandatory.
- Violators of the Code will face disciplinary action, up to and including termination of employment.

Your Role

- Every employee must adhere to the principles set forth in the Code.
- Employees must apply MoEngage's values and ethical standards in day-to-day business.
- If a law conflicts with this Code, you must comply with the law.
- You must never offer or accept bribes or kickbacks, or participate in corrupt activities.
- Employees must not make illegal payments or offer gratuities to government officials.
- Employees should endeavor to respect the rights of and deal fairly with customers, suppliers, competitors, and co-workers.
- Employees must maintain confidentiality of all non-public information entrusted to them.
- Employees must protect MoEngage's assets, including proprietary information and intellectual property.



Red Flags Reporting

- Conflicts of interest, where a person's private interest interferes with MoEngage's interests, are prohibited.
- It is a conflict of interest to work simultaneously for a competitor, customer, or supplier.
- Employees are prohibited from taking corporate opportunities for personal gain without Board consent.
- All employees must promptly report violations of this Code.
- You are required to talk to supervisors or other appropriate personnel about observed illegal or unethical behavior.
- Failure to report existing or potentially wrongful behavior is a violation of this Code.
- MoEngage will not tolerate any retaliation against any person who reports a possible violation in good faith.
- The Board shall investigate any reported violations and take appropriate disciplinary or preventive action

Further Reference

Refer Detailed Code of conduct policy in the Employee Handbook Manual in Darwinbox

If you become aware of any actual or suspected breach of this policy, you must report this to complaints@moengage.com