
Code of Conduct

Our Code of Conduct outlines general guidance about the Company's expectations regarding employees' behavior towards their colleagues, supervisors and overall organization. As members of the company, we want our stakeholders to understand the intent and spirit of this policy.

This means we:

- Understand the areas covered by the Code, Company policies and procedures and laws that apply to our job.
- Follow the legal requirements of all locations where we do business.
- Speak up if we have concerns or suspect violations of the Code, Company policies and procedures or laws.

The Code of Conduct cannot address every situation that may occur. We are expected to exercise good judgment and ask questions when we need guidance or clarification.

A. Equal Employment Opportunity

The company provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or marital status. We believe in diversity.

B. Zero Tolerance Policies

We express to maintain our work environment free of harassment and will not tolerate violence, alcohol & substance abuse, use of weapons gambling or any other unlawful activity at workplace.

- **No Violence at Workplace**

It refers to **physical acts of violence or threats** to harm a person or property. Abusive behavior, whether **verbal, psychological or physical**, are also considered violence. More specifically:

- **Verbal abuse** - using unwelcome, embarrassing, offensive, threatening or degrading language.
- **Psychological abuse** - which provokes fear or diminishes a person's dignity or self-esteem.

- **Sexual abuse** - any unwelcome verbal or physical assault.

We can't always predict violent acts, but we ask managers and team members to be vigilant. Report any concerns or violent acts to HR as soon as possible.

➤ **Examples**

Examples of violent behavior among co-workers include but are not limited to:

- Intimidating or bullying others
- Abusive language
- Physical assault
- Threatening behavior
- Concealing or using a weapon
- Sexual or racial harassment

We will investigate all such incidents quickly and discreetly. Our company doesn't tolerate violence. Any such behavior will trigger strict disciplinary action which may lead to termination.

- **No Alcohol & Substance Abuse**

We have established safeguards against drug and alcohol abuse to ensure a safe and healthy working environment.

➤ **Restriction on Alcohol & Substance Consumption at Workplace**

Illegal drugs, inhalants or any such type of substance fall into the "**substances**" category. We have also placed restrictions on alcohol consumption.

While working, you **must not**:

- **Possess, use or be under the influence** of alcohol or any substance.
- **Sell, buy or transfer** alcohol & substance.

We will investigate all such incidents quickly and discreetly. Our company doesn't tolerate alcohol & substance abuse. Any such behavior will trigger strict disciplinary action which may lead to termination.

- **No Weapons at Workplace**

You cannot bring, carry, store or use any type of weapon at workplace. A "weapon" is a firearm, ammunition, explosive, or any other similar device

- **No Gambling at Workplace**

Gambling while at work and using company assets for gambling are prohibited, including during breaks. For purposes of this standard, "gambling" is defined as playing a game for money or property or betting on an uncertain outcome.

Prohibited gambling activities include, but are not limited to:

- Games (e.g., cards, dice, and dominoes) played for money or property
- Sports pools IPL, World Cup tournaments

- Internet gambling

C. Anti-Bribery & Anti-Corruption

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate. We strongly condemn corporate bribery.

Our associates are prohibited from engaging in any direct or indirect bribery, including payments through third parties. We should never offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official or commercial partners including customers or their representatives to:

- Obtain or retain business,
- Influence business decisions, or
- Secure an unfair advantage

Important Highlights

➤ In this context, **third party** means any individual or organization that an associate may come into contact with during the course of his/her engagement with the Company, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, business associates and government and public bodies including their advisors, representatives and officials, politicians and political parties.

➤ **Bribery**

Bribery means a financial or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your reporting manager or CEO of the company.

Specifically, you must not:

- i. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return or to reward any business received;
- ii. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
- iii. give or offer any payment (sometimes called a facilitation payment) to a government official to facilitate or speed up a routine or necessary procedure;
- iv. threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

➤ **Gifts & Entertainment**

In connection with certain holidays and other occasions, it is customary in many parts of India to give gifts of nominal value to customers and other parties who have a business relationship with the Company. However, we should be careful while doing so, we do not violate any regulations or do anything that is contrary to our core values.

When we offer a gift to a customer, a government official or any third party, we should keep the following in mind:

- It is not done to obtain or retain business or gain an improper advantage in business;
- It is lawful under the laws of India and permitted under the policies of the client;
- It constitutes a bona fide promotion or goodwill expenditure;
- It is not in the form of cash;
- The gift is of nominal value

➤ **Raise a Concern**

If you are offered a bribe or asked to make one or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your reporting manager or CEO of the company.

D. Professional Conduct

We regard each employee as a brand ambassador for the Company and firmly believe that each one of us is a torchbearer of the Company's image. To maintain the Company's image at all times it is the responsibility of each employee to conduct themselves in a professional manner at all times.

Do's : Employees should:

- ✓ Conduct themselves in a courteous and professional manner.
- ✓ Be aware of their personal appearance and grooming. Refer Professional Attire Policy.
- ✓ Be conscious of their language, courtesy, manners and conduct with other colleagues, clients, vendors and suppliers.
- ✓ Demonstrate a sense of 'professional pride' in their work habits.
- ✓ Misuse of Company logo, materials, dress, merchandise and stationery or any such reason is prohibited.
- ✓ Employees will wholly and exclusively be in the employment of the Company. Employees shall not at any time during the tenure of their employment directly or indirectly, without the prior written consent of the Company, engage or interest themselves whether for reward or gratuitously, in any work or business, other than in respect of their duties with the Company.

Don'ts : Employees should not

- X Misbehave with colleagues and any stakeholder including customers
- X Do Insubordination
- X Speak to media / agency / external vendor without approval

- X Share email / confidential information to others without approval
- X Come late to office
- X Absent without intimation
- X Do IT data sharing, Password sharing
- X Misappropriation of funds
- X Manipulation in documents
- X Indulge in mismanage cash in branch
- X Move funds from one customer to another
- X Fund to customer
- X Stealing or using company items for personal use
- X Any other act against the interest of organization

E. Conflict of Interest

When the interests or benefits of one-person conflict with the interests or benefits of the Company, a conflict of interest is said to occur. We must avoid situations involving actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised. We expect each employee to perform job duties in pursuit of the company's best interests and to refrain from letting personal interests influence or appear to influence, business activities.

Few Examples

- Encouraging entities dealing with the Company to buy supplies or services from relatives or friends.
- Borrowing money from entities doing or seeking to do business with the company
- Directly hiring or supervising a relative.

All activities conducted, as an employee of the Company should always place the lawful and legitimate interests of the Company over personal gain

F. Protecting Company Assets

Each of us is responsible for the proper acquisition, use and maintenance of company assets (e.g., materials, equipment, tools, property, information, data, intellectual property and funds) and services. All the company assets provided at work is to be used exclusively to facilitate the business of the company.

Important points:

- Equipment laptop, printer and copiers should be used exclusively for business purposes. Employees are advised to transmit, receive or copy information for business purpose only.
- Employees are advised not to be present on Company premises while not on duty without prior approval from the reporting manager.
- Mobile recording of conversation is strictly prohibited and should not be allowed at any level except Risk team for official purpose.
- Employees must not steal, fraud or misappropriate money or property from the Company or any other party.

- Employees must take care of all the Company's property.

G. Company Record Confidentiality

When we do our work, we generate, receive, and use, company information. Information is created every day, whether computerized or on paper. Each employee must manage information carefully and responsibly, and be accountable for identifying records from information. Company records must be stored, managed and disposed of in accordance with specific Company procedures.

Examples of company records include:

- Customer records and their documents
- Process Maps
- Personnel documents
- Reports to government agencies or other public communications
- Financial or other benefit-related information including reports

Don't's when working with company information and records:

- Never misstate facts or omit material information
- Never hide, alter, falsify or disguise the true nature of a business transaction or commitment
- Never forge endorsements, approvals or authorizing signatures
- Never process, enter into a system or approve a record or disclosure that you know is false or misleading

Refer our Privacy Policy to Protect Data and Report any issues to your supervisor or other appropriate person for any violation.

H. Discipline

As professionals, we expect all employees to be disciplined and demonstrate integrity in all business interactions. The following are typical reasons for disciplinary action up to and including termination:

- Falsifying of any records, reports, lists, communications or any information pertaining to Company employment or benefits. This includes falsification of résumé, medical records, application details, inaccurate attendance records, false or inaccurate claims for remuneration, allowances etc.
- Performing below standards or persuading or causing others to perform below standards.
- Not Punching Entry time in Rise Above HRMS on daily basis
- Failing to notify the Company when absent or late or refusing to explain the reason for absence.
- Having unauthorized or repeated or excessive absenteeism.
- Going out during Office Hours for personal reasons without taking permission from Reporting Manager.
- Going on unapproved leaves
- Refusing to follow lawful instructions or orders of management, insubordination and or neglect of duty.
- Sleeping during official working hours.
- Performing outside work or use of company property, equipment or facilities in connection with outside work while on company time.

- Attending too many personal calls during working hours.
- Keeping your workplace dirty
- Found smoking or chewing tobacco inside office premises
- Physical harassment; sexual harassment; disrespect toward fellow employees
- Accompany visitor in office premises without prior permission or attend visitors in restricted areas of company
- Unauthorized or illegal possession, use or sale of alcohol or controlled substances on work premises or during working hours
- Unauthorized possession, use or sale of weapons, firearms or explosives
- Unauthorized public statement
- Violence by an employee or anyone else against an employee, supervisor or member of management
- Illegal duplication of software

The underlying philosophy here is that discipline and integrity in all employee matters. This necessarily has to be reciprocated by all employees. While it is not possible or feasible to list out every instance, the approach will be one that will take into account both the nature of the problem and the seriousness of the offence. Any breach of discipline by an employee will lead to disciplinary action.

I. Insider Trading

In the course of our everyday work, as an employee, a consultant or a vendor, we may have access to “material” non-public Company information. Material non-public information is information about a company that (i) is not in the public domain, and (ii) that an investor would find useful to decide whether to trade in the Company’s securities. This could include information about potential new businesses of the Company, acquisitions, expansion plans, Company strategy, major management changes, dividend rates, earnings, mergers, and information on potential litigation and so on. The list is quite exhaustive.

Under applicable securities laws, it is unlawful for a person who has such information to trade in the shares of the Company or to disclose such information to others who may trade. This activity is commonly referred to as ‘insider trading’. Insider trading may lead to imprisonment, fines and insider traders may even be subject to private lawsuits.

Important Points to consider

- Take care that we do not disclose non-public information and material to anyone outside the Company, including family and friends.
- It can also be illegal to disclose (or “tip”) any information related to company to others who then buy or sell securities based on the tip.
- Never make investment decisions about any equity or debt securities based on material nonpublic information obtained in the course of your employment.

J. Compliance

We respect the law at all time and shall be bound by the law. Compliance with all applicable laws and regulations will never be compromised. Additionally, internal rules and regulations will be adhered. Those internal rules are specific to the Company and may go beyond what is required by the law. We shall ensure full compliance with all provisions of this Code, to do the right thing always and to ensure the highest standards of integrity.