



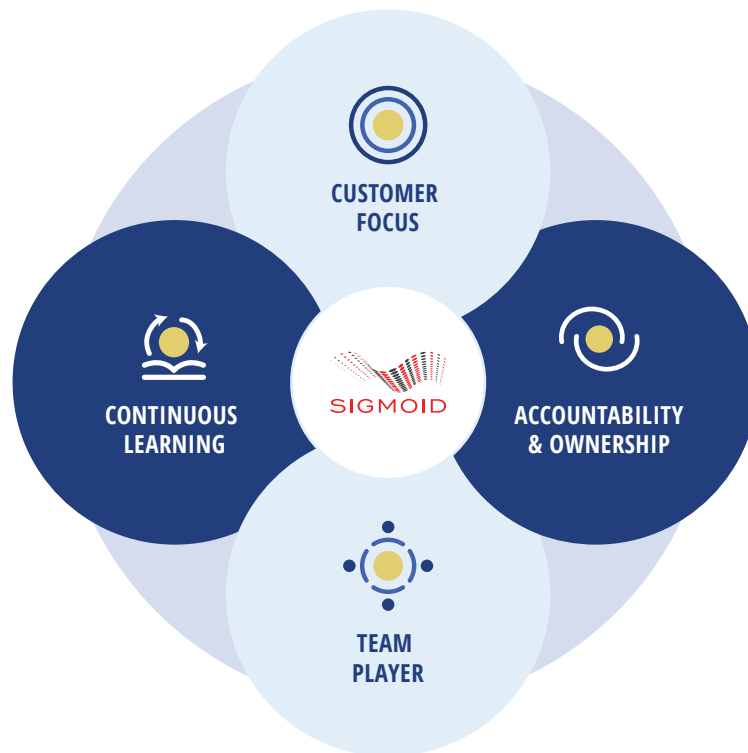
CODE OF CONDUCT

This Code of Conduct is our guide to ethical business commitment. It cannot cover every situation or circumstance, but it can be summarized in one simple idea: **"do what is right."**

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Values



<p>Customer Focus</p> <ul style="list-style-type: none"> ✓ Know your Customer ✓ Understand End Goal ✓ Set Expectations ✓ Manage Expectations 	<p>Ownership & Accountability</p> <ul style="list-style-type: none"> ✓ Own End Results ✓ Act as Owner ✓ Take Initiatives and Responsibility ✓ Honour Commitments ✓ Communicate
<p>Team Player</p> <ul style="list-style-type: none"> ✓ Team>Self ✓ Be Supportive ✓ Respect Others ✓ Be Disciplined 	<p>Continuous Learning</p> <ul style="list-style-type: none"> ✓ Know what you don't know ✓ Embrace Learning ✓ Learn Pragmatically ✓ Pre-requisites for learning ✓ Learning Strategy

Our values are the principles we use to run the Company on a daily basis. They are so important that they are the source of our entire Code - a sort of ethical backbone. They are clear and simple and are the foundation of everything we do.

1. Introduction of Code of Conduct

Sigmoid originated as an idea and today is a living and growing entity with hundreds of employees both in India and outside. Given the diversity of cultures, languages, beliefs and backgrounds of our employees, we are fortunate to maintain a vibrant workplace environment.

While it is our differences that make us unique, it is our values and principles that unite us as a company. This Code of Conduct (CoC) is to set forth the core values, commitments and responsibilities for all the employees (full time, part time and consultants) working for Sigmoid. Along with providing a general guidance about company's expectations from its employees, it also highlights situations that may require particular attention, and references additional resources and channels of communication available to the employees for cases where there are ambiguities.

The intent behind drafting the CoC is to help guide all employees on how we engage with our customers, our business partners, our colleagues and the communities where we work and live. The CoC, however, cannot possibly address every situation we face at work. Therefore, it is by no means a substitute for our good judgment, which all employees are expected to administer.

Please review the entire CoC and refer to it whenever you have a question on your conduct in professional situations. If requested, you shall confirm in writing that you have reviewed the CoC and understand and agree to adhere to our core values, shared responsibilities, global commitments and promises.

Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with laws, rules or regulations that apply to each of us; our CoC; or any other Sigmoid policy or requirement.

2. Responsibilities under the Code

a. Employee

It is the responsibility of each employee to be aware of and abide by the code of conduct elucidated in this document. Additionally, all employees also have the responsibility of behaving/acting in an ethical manner compliant with the applicable laws of the land. Further, each employee is responsible for reporting any violations of the code they observe within the company to the appropriate authority.

b. Managers

In addition to the above, Managers have an additional responsibility to drive a culture of integrity, honesty, ethical and law-abiding behaviour among other employees in the organization. Towards this end, they are expected to be a role model of the behaviours expected of employees, reinforce the code of conduct as part of regular employee communication, and encourage employees to report violations of the Code and guard against taking retaliatory action against someone for making a good faith report.

3. Responsibilities of Managers & Supervisors

Managers and supervisors at Sigmoid are expected to hold themselves to the same high standards that they demand of their teams. Managers play an essential role in building a culture of transparency, open communication and trust that extends from colleagues to customers to business partners.

To help achieve this, Managers should:

- ✓ Live Sigmoid's values every day
- ✓ Listen and take action when team members raise concerns – however big or small
- ✓ Be knowledgeable about the laws, rules, regulations and policies that apply to their teams
- ✓ Personally handle or escalate compliance issues appropriately
- ✓ Conduct themselves in a non-discriminatory and professional manner in their day to day working with employees and customers
- ✓ Educate themselves and their team member about sexual and other harassment and ensure an open culture where people can voice their concerns
- ✓ Highlight and recognize decisions that honor our values
- ✓ Demonstrate accountability and a willingness to listen to all points of view
- ✓ Make time to discuss the importance of ethics and compliance regularly with their teams
- ✓ Encourage colleagues and others to contact their manager or concerned stakeholder within the company, for help when issues or questions arise and to be timely and candid in reporting any unethical or illegal conduct or compliance issues

4. Speaking up and seeking help

It is every employee's obligation to speak up and report unethical conduct or conduct that is in violation with this CoC. We should be willing to describe the situation in an accurate, truthful and a timely manner to the correct stakeholders or respective managers.

If you are not sure that the conduct you were subjected to or observed, is in violation of the code, it is always ok to speak up. Your immediate resources are your managers and the Human Resource team. Employees can also reach out to the 'Internal Complaint Committee' (ICC, icc@sigmoidanalytics.com) to report any such incident.

Please be assured that during the investigation, unless required by the policies of the company, your identity will be kept confidential and the decision will be made through a fair and transparent process.

Sigmoid prohibits retaliation against anyone who makes an inquiry, reports an allegation in good faith or truthfully participates in an investigation.

The following sections highlight some of the key components of the Sigmoid CoC:

5. Behavior towards Fellow Employees

At Sigmoid we are expected to ensure that we never - verbally or physically mistreat others or engage in offensive behavior or tolerate those who do. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence and any other conduct that interferes with a co-worker's ability to do his/her job.

Sexual Harassment – Sigmoid follows a zero-tolerance policy towards any behavior which makes the employee uncomfortable in this regard. The examples of sexual harassment can include:

- ✓ Unwelcome propositions, demands or advances of a sexual nature
- ✓ Unwelcome physical contact such as hugging, kissing, grabbing, pinching, patting or brushing up against someone
- ✓ Unwelcome and inappropriate remarks about someone's body or appearance, sexual gestures or comments, unwanted verbal or physical interactions of a sexual nature
- ✓ Unwelcome vulgar or obscene gestures, language or comments

The policy in this regard is gender neutral and any violation can be reported directly to icc@sigmoidanalytics.com

Please refer our Anti Sexual Harassment Policy for more details.

6. Behavior towards External Stakeholders

Employees should behave courteously and show respect in a way that sustains cordial feelings whether they are meeting in person, talking over the telephone, or writing/ communicating electronically to a customer/contractor/consultant working directly/indirectly with Sigmoid. Any action or behavior which is derogatory, insulting or is inconsiderate of external stakeholder's time and resources can attract disciplinary action towards the employee.

7. Compliance to Laws and Regulations

Sigmoid and by extension all its employees are expected to follow and adhere to the laws of the land. Hence, it is expected that at all times, the actions and behavior should comply with the locally enforced laws and regulations. In case you observe any action by your fellow employees which appears contradictory to the laws, it is your duty to inform the HR or your reporting manager so that appropriate action can be taken.



8. Equal Opportunity Workplace

At Sigmoid, we strive to provide a work environment free of discrimination and harassment. We are an equal opportunity employer and employment decisions are based on merit and business needs. Our employees are expected not to discriminate or allow harassment on the basis of race, color, religion, disability, gender, national origin, sexual orientation, age, or any other legally protected status.

9. Confidentiality

Company's rates, charging structure, business plans and all information pertaining to financial management, clients, competitors and other contacts are company's sole property. This also applies to the company's products, solution concepts, marketing campaigns, JVs, partnerships and all other non-public information.

No information (complete or incomplete) with regard to the above and, no other information of sensitive nature, is to be passed on to any organization and/or individual outside Sigmoid unless employee has a clear directive and a written permission from the management to do so. In case where you are not clear if certain information is sensitive or not, please consult your manager.

10. Conflict of Interest

When the interests or benefits of one person conflicts with the interests or benefits of the Company, a conflict of interest is said to occur. Employees are expected to avoid situations involving actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised. Conflicts of interest also occur when we or our family members receive improper personal benefits, or preferential treatment as a result of our position, or the position of a family member, in the Company. Some specific situations are listed below:

- ✓ **Outside Employment** - If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment (Full Time/ Part Time or Consultant) with any other company or business entity, it is considered outside employment and a conflict of interest.
- ✓ **Working with Family and Friends** - To avoid conflicts of interest and any appearance of favoritism, ensure that you do not work directly for, supervise or make employment decisions about a family member. This includes positions or assignments within the same department and the employment of such individuals in positions that have a financial or other dependence or influence (e.g., an auditing or control relationship, or a supervisor / subordinate relationship).

- ✓ **Related Party Transactions** - You should avoid conducting Company business with a relative, or with a business in which a relative is associated in any significant role.
- ✓ **Relationships at Work** - Personal or romantic involvement with a competitor, supplier, or another employee of the Company might affect your ability to exercise good judgment on behalf of the Company. This could lead to conflict of interest. Personal relationships and romantic liaisons between employees who are in a manager-employee reporting structure may lead to team management challenges and reduced morale. Such relationships must be disclosed to the manager immediately, who may take appropriate corrective action.
- ✓ **Outside Directorships** - It is a conflict of interest for employees or directors to serve as a director of any company that competes with Sigmoid. With prior approval of the Management, employees may serve on the boards of other business entities, provided such entities do not compete with Sigmoid.
- ✓ **Outside Investments** - You should not have a financial interest, including through a relative, in any organization if that interest would give or appear to give you a conflict of interest with the Company. You should be particularly sensitive to financial interests in competitors, suppliers, customers, distributors and strategic partners.
- ✓ **Political Activities** - No employee of Sigmoid shall take an active part in politics, represent a political party and contest for election anywhere outside the Company and shall not involve other employees, clients, suppliers, vendors or any other party with whom the company does business in any such activity.

Employees may not contribute or solicit political contributions and or use Company's funds or assets to any political candidate, party, or similar organization. Under no circumstances will the Company directly or indirectly reimburse any employee for their individual contributions.

Volunteering of personal services during Company's working hours on behalf of a candidate, lobbying or engaging in any outreach to public officials, including attempts to influence legislation, government agencies, etc. are prohibited.

You should make clear that your political activities reflect your own personal views. Any overt, visible, and partisan political activity that could cause someone to believe that your actions reflect the views or position of Sigmoid is prohibited.

11. Gifting

Gifts or benefits of any kind must not be received by an Employee or their immediate family, when it might be perceived that an obligation is created, or a favor is expected. The receiving of gifts and promotional items of modest value (Up to INR 1000/-) is acceptable. Never solicit or accept a personal benefit as a condition of performing your duties.

A gift in this regard refers to anything of value, including, but not limited to, meals, accommodation, loans, cash, favorable terms or discounts on any product or service, services, equipment, products, transportation, use of vehicles, vacation or other facilities, securities, home improvements, tickets (travel, leisure, social, sporting events, etc.), gift certificates, gift cards, discount cards, memberships or consulting relationships, favorable employment, etc.

If the gift exceeds the limit, it is advisable to notify your Manager and HR and ascertain future course of action. An employee who procures a service from a vendor (or is involved in the procurement process) should inform the vendor of the Company's Gift Policy in order to avoid any embarrassment in this regard.

12. Punctuality, Absenteeism & Insubordination

Punctuality - Employees are expected to arrive at work and for meetings on time as per their respective working / shift hours. If an employee anticipates late arrival he/she must inform the immediate manager (or a colleague in case the immediate manager is not available) in advance to allow for schedule changes and to handle coverage of working hours. Repeat challenges with late arrivals will be recorded as misconduct in the employee's records. All employees working with customers must ensure that all meeting commitments are met on time. Lapses in punctuality will not be acceptable and will amount to a breach of the Sigmoid code of conduct.

Absenteeism – Regular attendance is essential to the Company's efficient operation and is a necessary condition of employment. When employees are absent, schedules and customer commitments fall behind, and other employees assume added workloads. In case of planned leaves, employees are expected to apply for leave and notify the concerned colleagues in advanced. In case of an unplanned leave, Employees are expected to notify their manager and concerned colleagues and apply for the leave as soon as possible. If an employee abstains from work for five consecutive business days without informing their functional manager, it will be considered as a breach of the Sigmoid code of conduct and appropriate action will be taken.

Insubordination – Rude, aggressive, threatening or abusive behavior towards a manager or supervisor will be considered insubordination. Ignoring direct professional requests or failure to comply with clear instructions might also lead to a case of insubordination. The idea is to maintain a healthy, efficient and operational workplace. Such behavior when reported, will be taken under investigation by the human resource team and the management.

This policy however does not intent to hinder a healthy relationship between a manager and the team. We welcome open exchange of ideas and an open-door policy when it comes to suggestions, brain storming and finding alternate solutions to problems.

13. Theft

Sigmoid values all employees and their property and expects that employees in turn value the company and its assets. Therefore, we will tolerate no employee theft or stealing of any kind. This includes theft of money, information, products, inventory, tools, information or idea that belongs to the company or to an employee, customer or business partner of the company. Fraudulent access card swiping will also be considered as a violation of this policy.

We expect all incidents of employee theft to be reported immediately to your supervisor or HR representative, along with any data or information you have observed or obtained. Sigmoid further retains the right to use video cameras and audio recording methods as well as software to identify and detect employee theft.

14. Alcohol and Substance Abuse

Drugs and alcohol can be a danger to everyone in the workplace. Sigmoid does not allow the possession, use, purchase, sale, attempted sale, distribution or manufacturing of illegal drugs in its workplaces. We also do not allow the abuse or misuse of alcohol and prescription drugs either in the workplace, company events or when conducting company business.

This means that the employee should not report for work while impaired by drugs or alcohol. Employees are expected to use good judgment when consuming alcohol at an event sponsored by Sigmoid, its customers or partners.

Employees in violation of this policy will be subject to disciplinary action, up to and including termination. Violations also could lead to arrest and prosecution by law enforcement if such violations involve illicit drugs or other illegal activities.

15. Company Asset and Internet Usage

Company Asset - Laptops, phones, office supplies and facilities exist for the purpose of helping us all maximize our performance as individuals, as a team and as a business. By respecting these assets, we ensure they remain accessible and fully functional when our customers and colleagues need them.

It is expected of each employee to utilize these assets carefully and for business purposes only. In case the laptop is being used for personal purposes after hours, utmost care is to be taken in ensuring that the CoC is not getting violated by such uses.

Internet Usage - Access to the internet is provided for the purposes of conducting business on behalf of Sigmoid. Reasonable personal use of the Internet is permitted; however, employees are expected to exercise self-discipline in determining the correct and limited use of internet for personal reasons. High band width usage like video streaming, downloading large files and similar activities are prohibited and will be dealt with seriously.

Any illegal use of internet for downloading copyright material or visiting illegal websites or other similar activities will be subject to disciplinary action, up to and including termination.

16. Social Media Policy

This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, message boards, chatrooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in an appropriate manner.

- ✓ Employees should use their best judgment in posting material that is neither inappropriate nor harmful to Sigmoid, its employees, or customers
- ✓ Some examples of prohibited social media conduct include (not limited to) posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment
- ✓ Employees are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with their manager

- ✓ Employees should get appropriate permission before referring to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property
 - ✓ Social media use shouldn't interfere with employee's responsibilities at Sigmoid. When using company's computer systems, use of social media for business purposes is allowed (ex: Facebook, Twitter, [Company] blogs and LinkedIn), but personal use of social media networks or personal blogging of online content is discouraged
 - ✓ Subject to applicable law, after-hours online activity that violates the CoC or any other company policy may subject an employee to disciplinary action
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17. Disclaimer

This CoC serves as a reference document to all employees of Sigmoid. Sigmoid reserves the right to modify, suspend or revoke this CoC and any and all policies, procedures, and programs in whole or in part, at any time, with or without notice. Sigmoid also reserves the right to interpret this Code and these policies in its sole discretion as it deems appropriate.

Neither this CoC nor any statements made by any employee of Sigmoid, whether verbal or written, confer any rights, privileges or benefits on any employee, create an entitlement to continued employment at Sigmoid, establish conditions of employment or create an express or implied employment contract of any kind between employees and Sigmoid. In addition, all employees should understand that this CoC does not modify their employment relationship, whether at will or governed by a written contract.

Status / Changes	Ver. #	Effective Date
Original Issue	1.0	1st April 2020

FORM OF ACKNOWLEDGMENT

I have received and read the Company's Code of Conduct and understand the standards and policies contained in the Company Code of Conduct. I further agree to follow the values of the Company in all that I do and comply with the Company Code of Conduct.

If I have questions concerning the meaning or application of the Company Code of Conduct, any Company policies, or the legal and regulatory requirements applicable to my job, I know I can consult my manager, the Human Resources Department knowing that my questions or reports to these sources will be maintained in confidence.

Employee Name : _____

Employee ID: _____

Signature: _____

Date: _____

Please sign and return this form to the Human Resources Department.