

COMPLIANCE HANDBOOK

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1 INTEGRITY

1.1 OUR COMMITMENT

Axtria counts on you to uphold our reputation and high standards by always performing with integrity.

- **Know the standards, and live by them.** By knowing, understanding and acting in accordance with Axtria's values, applicable laws and Company policies, each of us can serve as a role model.
- **Know the law and ask questions.** You are expected to be familiar with the laws and policies that apply to your role. If you have questions, ask your manager or write to compliance@axtria.com
- **Raise concerns.** If you believe someone may be violating a law or policy, notify your manager, Human Resources or the Compliance division. Axtria management is dedicated to ensuring that our standards are upheld and any concerns are addressed. Retaliation against any colleague, who seeks advice, raises a concern or reports misconduct is strictly prohibited.
- **Always act with integrity.** You are never permitted to violate a law or policy, nor should you ever feel encouraged or pressured to do so—even if doing so may improve the bottom line or help meet a performance goal.

1.2 IT'S "OUR" RESPONSIBILITY

We are all expected to take ownership of compliance and to perform with integrity—that's what we mean when we say "it's mine, it's yours, it's all of ours." Your personal commitment to performing with integrity is critical to Axtria's success.

Performing with integrity means setting the right priorities and delivering on our commitments while adhering to Axtria's values and standards. We can do this by:

- taking responsibility and holding each other accountable;
- raising concerns and asking questions;
- making the right decisions even when the decisions are difficult; and
- maintaining Axtria's high standards in everything we do and everywhere we operate.

At Axtria, performance with integrity is not only what we do—it's who we are.

1.3 OUR RESPONSIBILITIES

Integrity is at the core of our Company's identity and reputation, and we are all responsible for performing with integrity in everything we do. We are also responsible for raising concerns about risks to the Company—ideally before these risks become actual problems. If you reasonably believe that a colleague has violated or may violate a law or Axtria policy, you have a duty to report that information immediately to your manager, another manager, Human Resources, or the Compliance Division.

Axtria has Open Door, anti-retaliation, and confidentiality policies to protect colleagues. Retaliation against any colleague who in good faith seeks advice, raises a concern, or reports misconduct is strictly prohibited. Whenever you are in doubt, it is best to raise your concern.

We act with respect for people, the environment, and the law. Non-compliance can pose serious risks for Axtria, customers, investors, colleagues, and other stakeholders. By raising concerns, you give management the opportunity to address potential problems. You also protect the Company from all known and unknown threats. You shall disclose to Axtria immediately if you are subjected to any criminal action or any police complaint/ legal case at any court of law during your employment with Axtria.

2 RAISING COMPLIANCE CONCERNS

At Axtria, many channels exist for reporting compliance issues. These include your manager via the Open Door Policy, Human Resources and the Compliance Division.

2.1 OPEN DOOR POLICY

The foundation of our compliance program is openness, accessibility, and discussion within the Axtria community. Most issues can be resolved locally before they become broader problems. The Open Door Policy encourages colleagues to present ideas, raise concerns and ask questions— especially those of a legal or ethical nature, but also those relating to quality of work and the working environment. Speak up about disrespectful, inappropriate, fraudulent, unethical or illegal behaviour, even if the behavior has stopped. You must promptly report potential violations of law to our Legal group. All managers are responsible for supporting this policy by maintaining an “open door” for colleagues who may reach out to them. While we hope that colleagues feel comfortable discussing any matter with their managers, there may be times when colleagues prefer to use another avenue for addressing issues. In these cases, you may speak with others, including:

- the next (higher) level of supervision;
- your operating unit head;
- any manager or supervisor;
- Human Resources; or
- the Compliance Division.

Whistleblowing- If you suspect that any fraudulent or unethical behaviour has occurred, you should write to compliance@axtria.com. Provided that the concern is raised in good faith, Whistle-blowers will not be at any risk of retaliation for coming forward. Furthermore, the Company will take all reasonable steps to prevent the harassment or victimisation of the Whistle blower.

2.2 HUMAN RESOURCES

Human Resources colleagues are available to listen to any concerns you may have. You may reach out to your local Human Resources representative.

2.3 THE COMPLIANCE COMMITTEE

There is a committee who specifically handles matters related to compliance. You can reach the committee at compliance@axtria.com.

2.4 CONFIDENTIALITY

It is essential that you feel secure when participating in the Company’s compliance program. Confidentiality is a priority and every effort will be made to protect your identity whenever you interact with any element of the compliance program. In some instances, however, it may not be possible to keep your identity confidential because of the nature of the investigation, the demands of conducting a thorough investigation, or certain legal requirements.

If you are involved in a compliance investigation in any capacity (for example, as a witness or complaining party), you may not discuss the investigation with anyone other than the Compliance Investigators conducting the investigation, not even your manager or others you believe have knowledge of the investigation.

2.5 ANTI-RETALIATION

Retaliation against any colleague, who in good faith seeks advice, raises a concern or reports misconduct is strictly prohibited. The fact that a colleague has raised a concern in good faith, or has provided information in an investigation, cannot be a basis for denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of his or her role in Axtria, retaliates against a colleague who has truthfully and in good faith reported a potential violation, Axtria will take appropriate action—even if it later turns out that the colleague was mistaken in reporting the matter originally. However, if an individual has intentionally made a false report, the Company will respond accordingly. If you believe that you, or another colleague, have been retaliated against for raising a good faith concern, you should contact the Compliance Division or the Human Resources Representative.

3 MARKETING INTEGRITY

Axtria is committed to fair competition as a matter of corporate conduct. Under laws that apply to marketing activities, it is illegal to use unfair methods of competition or unfair or deceptive acts or practices in commerce, such as:

- false or misleading advertising, or any other form of misrepresentation made in connection with sales;
- bribery of competitors' or customers' employees and
- unfair comments about competitors' products/services

Colleagues in sales, marketing and regulatory functions must be familiar with Axtria policies and procedures on relevant topics. Contact a member Compliance Division if you have questions about which policies, procedures, laws, regulations or industry standards apply to your work. Make yourself familiar with potential limits on the scope of Axtria's business and seek appropriate input and approvals before committing to expand into new lines of business or new territories or implementing new tools & technologies

4 ANTITRUST AND COMPETITION LAWS

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between Axtria and our competitors that affect prices, terms or conditions of sale, or fair competition. If you are responsible for areas of the business where these laws apply, you must make yourself aware of them and their implications, including how they apply in the country in which you operate.

Axtria prohibits:

- discussions or contacts with competitors about pricing, costs, or terms or conditions of sale;
- discussions or contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace;
- agreements with competitors regarding allocating markets or customers;
- agreements with others to boycott customers or suppliers; and
- otherwise forming unethical trade or commercial agreements or groups.

Many countries have antitrust or competition laws, though they vary significantly from country to country. For example, certain countries' competition laws may be more stringent than those of the United States and regulate, among other things: distribution agreements; rebates and discounts to customers; patent, copyright and trademark licenses; territorial restrictions on resellers; and pricing policy generally. These laws are complex. You must ask for advice from the Compliance Division before you act.

5 ANTI-BRIBERY AND ANTI-CORRUPTION

At Atria, we do not tolerate corruption in connection with any of our business dealings. Atria prohibits Atria colleagues and anyone acting on Atria's behalf from offering, giving, soliciting, accepting or receiving a bribe.

5.1 GOVERNMENT OFFICIALS

Neither colleague nor anyone acting on Atria's behalf may ever make a payment or provide a benefit that is intended to improperly influence—or even appears to improperly influence—a government official, or to gain an unfair business advantage.

“Facilitating payments” are a type of bribe generally used to facilitate or expedite the performance of routine, nondiscretionary government action. These payments are not permissible and are strictly prohibited by Atria.

5.2 COMMERCIAL INDIVIDUALS AND ENTITIES

Atria also prohibits “commercial bribery.” Generally, commercial bribery is giving, offering or receiving something of value to or from an individual or company in exchange for improper commercial conduct. Atria prohibits any colleague, middleman or other agent from directly or indirectly engaging in any form of bribery. Prior to giving or accepting any item of gift, meal, entertainment or travel, apply the following guiding steps, that it is:

- For a legitimate purpose and not intended to secure an improper advantage or otherwise inappropriately influence the recipient
- Permitted by applicable law
- Permitted by Atria's policies (specifically 'Atria Gift Policy')
- Permitted by the recipient's policies and by any agreements between Atria and the recipient's employer
- Reasonable in value and appropriate under the circumstance
- Not perceived as inappropriate

6 BUSINESS INTELLIGENCE

In today's business environment, we have access to a great amount of information about other companies, their products and services, some of which is non-public. You are free to gather intelligence about companies from verified public sources such as their websites, published articles, surveys, social media platforms, price bulletins, advertisements, brochures, public presentations and customer conversations. You also may contract with an outside vendor to gather business information, but only through the selection and contracting process administered by Axtria's Business Intelligence function. Business information about other companies may only be collected and used ethically and in a way that does not violate any laws or confidentiality obligations. You must never use, or ask any third party to use, unlawful or unethical means such as misrepresentation, deception, theft, spying or bribery to gather information.

7 GLOBAL TRADE COMPLIANCE

We are all responsible for complying with trade control laws, which are complex and may change quickly as governments adjust to new political and security issues. Violations of trade control laws can lead to significant fines and penalties, for both Axtria and any individuals involved.

Many countries maintain controls on where items or data may be exported to – these are called ‘export controls’. Under these laws, an ‘export’ occurs when a product, service, software, technical knowledge is transferred to another country or to any foreign citizen or representative of another country, regardless of where that person is located. Early on in any customer engagement, you should carefully consider the obligations of Axtria and the customer with respect to export controls. Axtria is engaged in import of software and other intangible assets. Several laws and legal requirements are applicable on imports. You should ensure to comply with all import laws, regulations and requirements when transferring goods and controlled software across borders.

8 PATENTS, TRADEMARKS AND COPYRIGHTS

Protecting Axtria's intellectual property is essential to maintaining the Company's competitive advantage. Axtria's intellectual property includes its patents, trademarks, trade secrets and copyrights, as well as scientific and technical knowledge, know-how and experience developed in the course of the Company's activities. You are expected to support the establishment, protection, maintenance and defense of Axtria's intellectual property rights and to use those rights in a responsible way.

You also must respect the intellectual property of others. Unauthorized use, theft or misappropriation of third-party intellectual property may result in significant fines, lawsuits or criminal penalties for the Company and you. Never use any third-party Intellectual Property (including images, charts, files, artwork, templates etc.) in your day-to-day work or for client work, unless appropriate permission is obtained or such third-party Intellectual Property is permitted to be used.

9 BOOKS AND RECORD KEEPING

Accurate business records are essential to the management of the Company and to maintaining and safeguarding investor confidence. They also help Axtria fulfil its obligation to provide full, accurate and timely financial and other disclosures. All of Axtria's books, records and accounts must fully and accurately reflect the Company's business transactions. These include financial statements as well as time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations and other essential Company data.

Each supervisor, manager, and individual employee has an obligation to each other and to the Company to comply with Axtria's business expenses and reimbursement policies and practices.

Axtria has records and information management policies and procedures to ensure that Company records are maintained, stored and, when appropriate, destroyed in accordance with Axtria's needs and in compliance with applicable legal, regulatory, environmental, tax, employment and trade requirements. ^{A*}

10 ACCEPTABLE USE OF COMPANY COMPUTERS AND RESOURCES

Axtria supports information systems and networks to help colleagues work as effectively as possible. When used inappropriately, Axtria's data and systems may be exposed to substantial risk. To ensure the security and integrity of Axtria's technology and information systems:

- Only authorized software, devices and procedures may be used.
- Your password must never be shared (not even with IT Support Team).
- Axtria business information may only be shared with authorized parties, and only by using Axtria email or other approved technologies.
- Unauthorized devices, such as home computers, may not be used to transmit, store or work on Axtria proprietary information.
- You are accountable for the use and security of the Company's telecommunication and information assets.
- All employees must adhere to the Axtria Information Security Policy.
- When working on Client Projects employees must adhere to policies that govern handling the Client Data.
- All employees must manage information in conformance with the prevailing data protection legislation.
- Never attempt to circumvent the established IT security policies or processes by any means, e.g. installing unauthorized software or modify configurations set by Axtria.
- Use client provided laptops / computers for client work only and do not use them for any unauthorized internal or personal work
- Avoid using client provided email account for communicating within Axtria even if such usage is approved by client, unless there are compelling business reasons to do so.
- Do not use any external web-based services or software including artificial intelligence to do any official or client work without proper approval by Axtria (or by the client for doing client work).

11 SOCIAL MEDIA

“Social media” are digital technologies and practices that enable people to create and share content, opinions, insights, experiences and perspectives. The hallmarks of all social media are user- generated content and interaction. When engaging in social media activities including both internal-facing and external-facing platforms, adhere to Axtria policies and these general principles:

- Be truthful, accurate and respectful.
- Be positive. Social media is a very bad place for anything that is remotely negative towards anybody.
- Report adverse events found on the Internet or in social media that could affect Axtria to the Compliance team.
- Ask first, post later.
- Be real. People love real people on social media.
- Avoid discussing political issues or religious issues, in social media.
- Do not make unauthorized disclosures.
- Do not use any client’s name in social media posts or use it in your resumé or similar document unless due authorization is obtained from Axtria Legal group

As posts are your personal opinions. Neither you nor your social media posts should give impression that the things you post represent Axtria’s view. Employees should not make any press statement on behalf of the company unless proper written authority is obtained from the company for this purpose.

12 CONFIDENTIAL AND PROPRIETARY INFORMATION

The products, services, ideas, concepts and other information we produce on a daily basis are important proprietary assets for our Company, including marketing plans, sales data, customer and employee records, solutioning, pricing information and information about business development opportunities.

It is important that Axtria protect and prevent inappropriate or unauthorized access to or disclosure of this information, as well as third party information provided to Axtria. Help protect confidential and proprietary information by following these principles:

- Be careful when using electronic means of storing and sending information.
- Do not disclose information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements. If in doubt, check with your manager or the Compliance Division.
- Do not discuss confidential information in public places where others may overhear.
- Beware of informal telephone or email requests from outsiders seeking information (commonly known as “phishing”).
- Share confidential information / data within Axtria only to authorized persons who have a “need to know” the information / data and if there is a valid business requirement to do so.
- Do not use data or information (including data related to clients, vendors, other employees and third parties) for which you do not have a business need

When Axtria, Customer or Third Party Confidential Information is no longer needed ensure that the confidential information is deleted from your laptop or other shared drive in accordance with Axtria, Customer or Third Party requirements. If you are unsure as to whether you are permitted to delete such confidential information please consult with your manager or write to compliance@axtria.com

13 PRIVACY OF PERSONAL INFORMATION

Preserving the privacy of personal information is critically important. Colleagues and many others provide personal information to Axtria. In addition, certain research and business activities may involve the review of personal information. It is Axtria's policy to keep this information confidential and secure in accordance with applicable laws.

Axtria and its business partners and agents are all accountable for protecting personal information, and for processing it only within the boundaries of applicable law and Axtria policies and procedures.

Help protect the privacy of personal information by following these principles:

- Always keep personal information strictly confidential and only use or disclose it in accordance with applicable laws and regulations and, when necessary, after giving notice or obtaining the individual's consent.
- Collect personal information only for legitimate business purposes and keep it only as long as necessary.
- Take adequate precautions to safeguard personal information.
- Share personal information only with individuals who have a legitimate need for it and will protect it properly.
- Allow individuals whose personal data is held by the Company to review and correct the information.
- Properly destroy records containing personal information according to Company guidelines.

14 INSIDE INFORMATION

Axtria prohibits “insider trading” It is illegal to buy or sell securities (for example, stocks, bonds or options) of a company when you are aware of “inside information”— material, non-public information— relating to the company. Securities laws and Axtria policy prohibit you from using or disclosing any inside information that you may acquire during the course of your employment at Axtria.

You cannot use information gained through your employment with the Company, before this information is known publicly, to buy or sell the securities of Axtria or any other company with which Axtria has or may be considering a relationship (for example, a customer, supplier, alliance partner or potential acquisition candidate).

Nor can you give inside information to anyone else so that they can trade. This applies no matter where you live or where the receiver of the information lives. These restrictions apply to you, your spouse and minor children, and anyone who lives in your household or is financially dependent on you. Securities law violations are taken very seriously. Government agencies and stock exchanges are able to monitor trading activities through computerized records searches. Violations may result in significant civil and criminal penalties against companies and individuals.

15 CONFLICTS OF INTEREST

A conflict of interest arises when you place your personal, social, financial or political interests before the interests of the Company. Even the appearance of a conflict can damage your reputation or that of the Company. However, many potential conflicts of interest can be resolved in a simple and mutually acceptable way.

While Axtria respects your right to manage your investments and does not wish to interfere with your personal life, you are responsible for avoiding situations that present—or create the appearance of—a conflict between your interests and those of the Company. Any potential conflict of interest must be disclosed to and approved by your manager. The Compliance Division must be consulted in certain situations.

We respect our employees' right to engage in personal political, religious activity, by making sure that such activities are lawful and appropriate and do not involve the use of corporate assets. If any one of our employees wishes to volunteer for any such campaign, he/she can do in his/her own time and as an individual, not as a representative of the Company.

Anti-Social activities - Axtria employees should not involve themselves in any acts that would in any way promote the activities of anti-social groups. Any contact to such groups and entities is strictly prohibited.

The following are examples of potential conflicts of interest.

15.1 PERSONAL INVESTMENTS OR TRANSACTIONS

Conflicts of interest may arise if you or a family member:

- has a substantial financial interest in a Axtria supplier, competitor or customer;
- has an interest in a transaction in which it is known that Axtria is, or may be, interested;
- takes advantage of Axtria's corporate opportunities for personal profit; or
- receives fees, commissions, services or other compensation from a Axtria supplier, competitor or customer.

15.2 PERSONAL RELATIONSHIPS

Axtria discourages hiring close personal friends or relatives in the same business unit and / or same reporting leader. A potential conflict arises if you hire, manage or otherwise do business with a close personal friend or relative or someone with whom you have an intimate relationship. The actions of family members and friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace.

15.3 OUTSIDE BUSINESS AND OTHER INTERESTS

A conflict of interest exists if your outside business or other interests can affect your objectivity, motivation or performance as a Axtria colleague. You should not have a financial interest, including through a relative or close acquaintances, in any organization if that interest would give or appear to give you a conflict of interest with Axtria

While Axtria encourages you to be active and interested in the community in which you live and work, some activities, such as serving on a board of directors or speaking at a conference, may present a potential conflict of interest in some situations

15.4 GIFTS, ENTERTAINMENT AND OTHER ITEMS OF VALUE

The Company prohibits you and your immediate family from giving and accepting gifts, services, perks, entertainment, discounts, loans or other items of more than modest value by local standards, to or from those who are doing business or seeking business with the Company. Items of modest value are permitted only if they are not given or received on a regular or frequent basis, and if they are not solicited by Axtria colleagues. If you need any guidance on this please get in touch with the Compliance Division.

15.5 CHARITABLE CONTRUBUTIONS

Charitable contributions and donations are considered an integral part of corporate social responsibility. As a part of its corporate citizenship activities, Axtria supports the areas of education, social welfare, disaster relief and other similar social causes. It has a Corporate Social Responsibility Team (CSR) for conducting CSR activities. There is no restraint on individual contribution for social causes provided the contributions are legal and ethical under local laws and practices and are made without demand or expectation of business return. Such individual contributions are not considered donations made on behalf of Axtria and associates should not use Axtria's name in such individual contributions.

16 EQUAL EMPLOYMENT OPPORTUNITY

It is the Company's policy to provide equal employment opportunities and, to the extent permitted by local law, to treat applicants and employees without regard to personal characteristics such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws.

Managers are responsible for ensuring compliance with this policy. Each operating unit should periodically monitor, report and, if necessary, improve its performance in the area of equal opportunity.

17 DISCRIMINATION OR HARASSMENT

Axtria values a work environment that is free of verbal or physical harassment. This includes any unwelcome comments or actions regarding race, color, ethnicity, creed, ancestry, religion, gender, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws. Please also refer to regional sexual harassment policy in detail.

This policy applies to conduct that: is made a condition of employment; is used as a basis for employment decisions; creates an intimidating, hostile or offensive working environment; or unreasonably interferes with an individual's work performance. Always report instances of harassment or discrimination as described below.

17.1 UNACCEPTABLE ACTIVITIES

A safe and ethical work environment is everyone's responsibility within Axtria. Following are some of the unacceptable activities:

- Violating safety regulations.
- Failing to make immediately report of an workplace occupational injury.
- Fighting, screaming, hitting, pushing, forcibly grabbing another employee, client, contractor, or business associate or otherwise committing an assault or any other similar physical acts or threats (disrespectful behaviour) while on company premises or circumstances arising out of company business relations. Loafing, loitering, or sleeping on the job.
- Usage of company resources like telephone, e-mail or Internet for personal use is prohibited.
- Being under the influence of drugs or alcohol or other intoxicants in office premises or while performing official duties, or (even in office sponsored parties ,
- Any behaviour that is seriously disruptive of normal flow of company business and altering an individual's behaviour.
- Committing any act or omission which is may potentially harm other employees physically or mentally
- Defrauding the company.
- Falsifying Documents.
- Tailgating and unauthorized movement using other employee Access ID is strictly prohibited.
- Any kind of modern slavery is incompatible with our ethical beliefs.

The above mentioned activities are not exhaustive but merely illustrative. These activities are in addition to any unacceptable activities mentioned in other relevant document and not in derogation thereof. In an event of an official employee not abiding by the above stated rules, then the Company shall reserve the right to initiate one or more of the following stated actions in accordance with the gravity of the misdemeanour actions or report to the appropriate internal authority for suitable action which may result in:

- Verbal Warning
- Written Warning
- Suspension
- Termination of employment
- Litigation

17.2 REPORTING DISCRIMINATION OR HARASSMENT

Managers are responsible for maintaining business units that are free of harassment and discrimination. Axtria is also committed to providing an environment that is free of retaliation.

Axtria promotes open communication throughout the Company to resolve questions, concerns, problems or complaints involving discrimination or harassment. If you experience or are aware of any discrimination or harassment, you can:

- talk to your manager, a Human Resources representative or an operating unit manager;
- contact Employee Relations or Corporate Human Resources; or
- contact the Compliance Division directly.

18 ABUSE OF DRUGS AND ALCOHOL

Substance abuse and smoking can pose serious health and safety hazards in the workplace. At Axtria, we are dedicated to achieving an environment free of substance abuse for the health and well-being of colleagues and for the benefit of the Company. Axtria's formal policy and guidelines are compassionate but firm. The use of illegal drugs and the misuse of alcohol and over-the-counter or prescription drugs is prohibited in the workplace. The workplace includes anywhere that a colleague is conducting Axtria business, regardless of time or location. In addition to pre-employment drug testing, colleagues may be tested when contractually required by a customer or if they display unusual or erratic behavior such that there is a reasonable suspicion of drug or alcohol abuse. Where permitted, colleagues may be subject to additional testing, including unannounced testing on a random basis.

19 MONEY LAUNDERING

When money obtained through illegal means is converted or transferred through a legitimate source this is referred to as 'laundering'. At Axtria we take steps to prevent anyone from using business transactions with Axtria to launder illegal funds. Specifically, personnel must:

- Take steps to verify the identity of service providers and customers prior to engaging in business transactions
- Be aware of possible money laundering activities and report any suspicions immediately
- Ensure that reasonable and appropriate screening of third party organizations has taken place.
- Report attempts to make / receive large payments in cash
- Report payments by someone who is not a party to the agreement
- Report requests to pay more than provided for in the agreement
- Report requests for payments made in currencies other than those specified in the agreement
- Report payments from an unusual, nonbusiness account

20 PREVENTION OF DATA MISUSE AND FRAUD

Axtria processes important data in many of its operations provided to Axtria by its clients. Axtria only works with data sourced from authorized sources and processed for legitimate purposes, in accordance with applicable laws. Forgery or tampering with data is never tolerated, and data must be acquired, verified, stored and used in an appropriate manner. In addition, it is necessary to report any fraudulent activities (fabrication of non-existent data and results, falsification of data, concealment of relevant data and results, plagiarism of the results of the research of others, etc.). If you detect or suspect any such data misuse or fraud, you must contact Axtria ISMS InfoSec team

21 ANTI-BOYCOTT LAWS

In the course of our work, we may receive requests for Axtria to boycott certain countries, companies or other entities. Boycott activity can take the form of refusals to do business with certain groups or requests for information about boycotted entities and this may be considered as an illegal foreign boycott if not initiated by the appropriate government. Be alert to these situations, as these requests may be contained as part of larger documents such as request for proposals, master service agreements, invoices or statements of work. If presented with such a request, please contact Axtria Legal immediately and before providing any response.

22 IMMIGRATION

At Axtria, employees are required to travel across the globe from time to time to support defined business requirements. During such travel, you are expected to ensure compliance with applicable requirements both under immigration laws as well as company policies.

23 ENSURING ACCURATE PUBLIC DISCLOSURES

Upon authorization, you must fully and truthfully cooperate with any examination or request for information from auditors, attorneys as well as law enforcement agencies. You must never mislead them in any manner regarding financial records, processes, controls or procedures or other matters which they may enquire about. If you are asked to respond to any request for information, you must notify the Legal Department immediately and prior to providing any response

24 SUSTAINABILITY COMPLIANCE

Axtria cares about the environment and wants to help create a sustainable society. We follow all relevant laws and rules and always try to minimize any negative environmental impact, which includes effects from using our vendors' products and services, at any stage of their life cycle, from getting materials, using, storing, recycling, or disposal.

25 RESPONSIBLE ARTIFICIAL INTELLIGENCE (AI)

For any AI work internal or for a customer, as a mandatory prerequisite, user should reach out to GenAI core committee. GenAI core committee at Axtria ensures overall governance and compliance for all Axtria GenAI projects. It's our utmost responsibility to ensure confidential Information embodied in clients and or vendors' AI is used in accordance with applicable laws, internal policies and/or contractual obligations.

26 COMPLIANCE WITH ALL APPLICABLE RULES AND REGULATIONS

Axtria expects all its employees to comply with all federal and state laws and regulations (including tax laws) and at the same time comply with Company's Rules and Policies. At Axtria we take the responsibility to comply with laws and regulations very seriously. We should also strive to ensure that all the corporate activities are in compliance with normal business practices and social ethics. It is the responsibility of everyone to comply with all applicable laws, rules, and regulations including in house regulations at all times.