

Name of the Policy	CODE OF CONDUCT
Reference No.	ALS Group/Corporate/ HR Policies

1. Introduction

The Code of Conduct for Apollo LogiSolutions Ltd. (ALS) and its associate companies, lays down the foundation for a variety of business practices and procedures. ALS makes sure that its business is conducted within the legal, professional and ethical standards in all respects. It articulates behaviours that the organization expects each employee to demonstrate in order to instil a culture of professionalism, respect, honesty & fairness at the workplace which is non-discriminating.

2. Objective

All employees must read areas covered under the code, understand the policies and procedures and conduct themselves in accordance with this code. Everyone has to follow the legal requirements of locations, where we do business and conduct ourselves in accordance with the rules & regulations laid down by the company and laws of the land. Employees are expected to speak up in case they suspect violation of the code, policies & procedures. Any eventuality of non-compliance/ violation of the code shall invite disciplinary action.

It is not possible to capture all the situations that might occur related to business/work in this policy. In case of any confusion, one is expected to use good judgement and can reach out to seniors/ Ethics Committee* for explanation/ clarification.

***Ethics Committee** – Ethics Committee shall be appointed by the steering committee, comprising 3 members for a period of 3 years. They shall be the conscience keepers of the organization with the following role and responsibilities:

- a. Employees can reach out to them for clarifications related to clauses of Code of Conduct.
- b. In case of any reported violation, they shall investigate the matter and their findings shall be final.
- c. They shall submit half-yearly reports to the steering committee regarding all matters reported and action taken.
- d. Employees can report suspected breach of the code to the HR department or to the following e-mail ID ethicscommittee@als.group. The identity of the person reporting shall be protected in good faith.

3. Coverage

This code applies to all the Employees of Apollo LogiSolutions and its associate companies. Employees include all individuals on full-time or part-time employment with the company, irrespective of whether permanent, probationary, trainee, retainer, temporary or contractual appointment.

4. Clauses covered under the policy

a. Conflict of Interest

A situation in which an employee is in a position to derive benefits apart from the normal compensatory rewards of employment, from actions or decisions made in their official capacity, is called a Conflict of Interest. It means, the situations where the personal interests of an employee are in conflict with that of the company. The management and the employees must avoid any situation which might result in a conflict of interest, either directly or indirectly.

Employees are expected to devote their full time and attention while working for the company and should not be simultaneously employed elsewhere. Employees must not engage with any competitor, customer or vendor, outside his/her professional working capacity, which could be detrimental to or in competition with the business affairs of the company. Conducting company business with family members also qualifies as a Conflict of Interest, therefore, must be avoided. In case, an employee's family member is associated with a competitor/ vendor, then it must be disclosed to the company.

In some situations, the conflict of interest may not be very clear and in some cases the employee may himself feel that his interests are in conflict with those of the company. In all these circumstances, the employees are advised to inform and consult with his superior or/and the Ethics Committee. Failure to disclose the same will be a violation of this code.

b. Confidentiality

The directors, the senior management and the employees have an obligation to protect the confidentiality of non-public information about the company, its subsidiaries, customers and vendors, unless the disclosure is authorised by the competent authority or required by laws and regulations.

The employees should use the company's data and records, intellectual property and other proprietary information with due care. The information, if disclosed, might be of use to the competitors and against the interests of the company.

c. Protection of Company Assets/Property

Employees are expected to protect the assets of the company against any improper handling and misuse such as negligence, wastage, destruction or theft. It is the responsibility of the employees to use the assets as efficiently as possible. These assets include physical, movable, immovable property as well as intellectual property such as copyrights, patents, trademarks and other technology used during the course of employment.

The assets of the company shall be used only for official purposes and personal use of the same is not advised.

d. Acceptance of Gifts and Benefits

Gifts may be given as a gesture of building social relationships but we prohibit the soliciting, offering or accepting of gifts or other benefits, which might influence business decisions.

Gifts to customers, if at all given, should not create an impression or be misinterpreted by the recipient as a form of bribery. Gifts may be accepted if they are of minor value i.e. within Rs. 2500/-

Any dealing with government agencies should be in a transparent and fair manner. No promises of any benefit in the form of job to relatives of government officials or gifts in cash/ kind to me made in return for any favour.

In case of doubts, the employee should consult his superior or the Ethics Committee.

e. Financial Information Integrity

Financial integrity is the is the key to building good reputation amongst stakeholders. Each employee is accountable for all the records in their area and must share/ present accurate, complete and processed data. Employees participating in accounting processes have a larger responsibility as it directly impacts financial statements and reports sent to external parties. It is their responsibility to keep company's financial records accurate and also must promptly report inaccuracies. Distorted data that may conceal the actual nature of transactions are clear breach of this policy.

f. Harassment

We, as an employer, believe that we have a social responsibility to ensure a pleasant and welcoming working environment for our employees, which is free of harassment and any kind of discrimination. We aim to stimulate high performance from the employees through our congenial employment

conditions and a competitive remuneration. We ensure equal employment opportunities to candidates and growth opportunities for our employees. We make sure that the workplace is free from harassment: physical, mental or sexual. Harassment on the basis of race, colour, religion, national origin, gender, sexual orientation, gender identity, age shall not be tolerated. Violence and threatening behaviours that adversely interferes with a co-workers ability to do his or her job, are strictly prohibited.

We expect integrity and respectful behaviour from all our employees towards each other and the society at large. With regard to business conduct of an employee, where harassment is meted out by a third party, the organization shall provide full support to assist the affected employee.

g. Health and Safety

We have committed towards providing a safe and secure workplace that supports the health and well-being of our employees. We ensure safe working equipment, clean and hygienic workplace with preventive measures for fire and other hazards.

Possession and/or use of weapons/firearms or ammunition while on business of the Company is prohibited, unless it is the requirement of the role.

In case of any workplace safety or health hazard, the employees must bring the same to the management's attention.

h. Concurrent Employment

Employees shall devote their time and efforts to promote company's business and no employee shall accept employment or a position of responsibility (outside the company as a director or a consultant) with any other company, without official approval from the company authorities. Employees shall not provide any adhoc service to anyone or any agency with or without compensation. In the case of a fulltime director or the chief executive of the company, such consent must be obtained from the board of directors of the company.

i. Code of Conducting Business

The Board Members, the Senior Management and the Employees shall conduct the business in an ethical, honest and transparent manner. We aim to compete fairly by providing quality services to our customers and prohibit unlawful and unethical trade practices. The employees must deal fairly with the customers and vendors; and must not indulge in manipulation, concealment, misrepresentation of material facts or any other illegal trade practice.

We promote healthy competition and work towards gaining a competitive edge by providing superior solutions to our customers.

j. Bribery and Fraud

We have zero tolerance towards offering or accepting improper payments in order to influence a government or business decision. Any situation in which a certain payment, gift or favour is interpreted by the recipient as intending to influence a decision should also be avoided.

All the employees and the management shall ensure high integrity and perform their duty in an ethical way, and must also avoid morally questionable incidents and decisions. Employees must act in a transparent manner and are strictly warned against being involved in any fraudulent practices that might harm the company. For example, submitting false expense reports, forging or altering cheques, misappropriating assets or misusing company's property, are all considered as fraudulent practices.

Employees must also not divulge to any outsider the details of our confidential information including trade secrets, financial accounts, etc.

k. Usage of Alcohol/Drugs

Usage and possession of alcohol, drugs and other controlled substances is prohibited at the workplace, as it not only affects performance but also impacts the working environment around. Any sort of addiction towards such substances restricts a person's ability to think and perform in a normal way.

There may be company sponsored events, in which the management approves the serving of alcoholic beverages. In such events, all the relevant liquor laws are to be followed. However, under all such cases, excessive drinking, intoxication and misbehaviour is not acceptable and will be dealt with severity.

The possession of prescription medicine for medical treatment is permitted.

l. Whistle Blowing

All the employees have a responsibility to identify and report fraud or related breaches of legal and ethical conduct. Any behaviour, as observed by the employee which they believe may be illegal or a violation of this code or any other company policy, should be reported to the Ethics Committee or at the e-mail ID ethicscommittee@als.group.

It is the responsibility of the management to protect the identity of the informer, who has reported the misconduct in good faith.

In cases of misconduct reported against them, employees are expected to cooperate in internal investigations.

m. Conduct of Auditors

The directors, the senior management and the employees are prohibited from taking any action to influence the auditors in making the financial reports misleading and inaccurate. Employees shall not take any action to coerce, manipulate, mislead or fraudulently influence the Company's auditors and the audit reports. All the financial and audit reports should reflect a clear and actual picture about the company.

n. Disciplinary Action

The Ethics Committee has whole and sole authority to determine whether violations of the Code (spirit or intent) have occurred or not. If it has, it shall invite appropriate disciplinary actions against the offender. The disciplinary actions shall include reprimand, warning, counselling, oral/ written, or suspension without pay, termination of employment, requisite compensation and the filing of civil or criminal charges to an appropriate authority. This is applicable to following category of people:

1. The offender and others who were involved in wrongdoings such as employee who fail to take measures that could have stopped the offence to take place.
2. Who failed to notice an offense and report thereof.
3. Who withheld appropriate information with regard to an offense.
4. Who overlooked the offense or attempt to react against employees/ agents for reporting a wrongdoing.
5. Who leaked information gathered during an internal investigation.
6. Did not co-operate in investigation process.

o. Annual Pledge

For compliance with this code the company shall have a code of conduct pledge signed by all the employees annually confirming their adherence and acceptance of the code.

The management is authorised to add, remove, modify and alter the clauses in the code as per the future needs and requirements of the company.