



Quadwave Consulting Pvt. Ltd.

# Code of Conduct and Ethics Policy





**Quadwave Consulting Private Limited**

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**Shreenatha M. Narayana**  
Director, Quadwave, India

Dear Quadwavians,

As we collectively navigate the dynamic landscape of the software services industry, I am reaching out to underscore the fundamental principles that define us as a company and as individuals. Our journey towards excellence is paved by the quality of our services and our commitment to the highest standards of integrity, diversity, and competence.

First and foremost, let me reaffirm the critical importance of adhering to our code of conduct. This code is not just a set of rules but a reflection of our shared values. We must maintain the highest levels of ethical, principled, and truthful behavior in all our interactions—be it with our valued customers, esteemed colleagues, or trusted suppliers. Our reputation is built on trust, and it is paramount that we continue to be exemplary ambassadors of integrity in every aspect of our work.

Creating a respectful workplace is not just a courtesy but a necessity. Each of us plays a role in shaping the culture of our organization. By creating an atmosphere of mutual respect, we enhance our working environment and contribute to the overall success of our collaborative efforts. Let us be mindful of our words and actions, ensuring that they reflect the principles of respect and consideration for one another.

Diversity and inclusiveness are the pillars of our identity. Our strength lies in the unique perspectives each of you brings to the table. Let us cultivate an environment that not only respects but celebrates our differences, building a workplace where everyone feels valued and included. Embracing diversity propels us forward, sparking innovation and enabling us to tackle challenges with a wealth of perspectives.

In addition to the core values of integrity and inclusiveness, I want to emphasize the importance of building the highest levels of competency in your respective areas of expertise. Our industry is characterized by constant evolution, and staying at the forefront requires continuous learning and growth. Seek opportunities for professional development, stay informed about industry trends, and collaborate with your colleagues to share knowledge. Through this commitment to competence, we ensure our ability to deliver exceptional solutions to our clients.

As we focus on maintaining our foundational values, I am excited to introduce a cultural shift that aligns with our commitment to excellence—cultivating a culture of self-driven individuals. This involves four crucial steps. First, be self-starting—be innovative, resourceful, and ground-breaking in your approach. Second, be self-driven—take ownership of your work, be proactive, and go above and beyond to achieve success. Third, be self-supervising—demonstrate the ability to work unsupervised, showcasing your independence and accountability. Finally, be self-certifying—strive for excellence in your work, consistently delivering quality that speaks for itself.

These four steps empower Each of you to be the architects of your success and contribute significantly to the collective triumph of OUR QUADWAVE. As we march towards a highly successful future, let us embrace this culture of self-drive, fostering an environment where innovation, autonomy, and quality are not just encouraged but celebrated.

**Together, there is no limit to what we can achieve!**

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## 1 Introduction

The Code of Conduct is our moral guide, directing our behavior and decision-making. It mirrors the values and mission of our organization, establishing the standards of conduct we expect from both ourselves and our colleagues. Embracing this code allows us to create a workplace where everyone is esteemed and respected, fostering a collaborative environment for achieving our collective objectives.

This document outlines our fundamental values, collective responsibilities, global commitments, and pledges. It offers general guidance on the Organization's expectations, points out situations requiring special attention, and directs you to additional resources and communication channels. It also serves as your initial reference point for clarifying any concerns regarding ethical behavior. However, it's essential to acknowledge that our code cannot cover every circumstance we encounter at work. Therefore, it is not a substitute for exercising good judgment, which Quadwave relies on from each of us.

It is crucial to recognize that we are individually accountable for our actions, with the ethical choice always being superior. We encourage you to thoroughly review the entire code and consult it whenever you have inquiries related to ethical conduct.

In addition to the code, we should know all Company policies and procedures applicable to our work. You may refer to the other policies published at Quadwave.

## 2 Purpose

This policy serves as a guiding force, directing the behavior of our staff in alignment with the core values of our Company. This essential document empowers our team to make ethical decisions and adhere to established principles, irrespective of their global location. It serves as a guiding light, ensuring that our employees consistently act according to our Organizational values and uphold ethical standards no matter where they are engaged in operations worldwide.

## 3 Scope and Applicability

This policy applies to all associates and third parties.

This policy complements other obligations and responsibilities delineated in employment terms, company policies, relevant laws, and regulations.

## 4 Definitions

“Company”/“Organization”/“Quadwave” refers to the Quadwave Consulting Pvt. Ltd.

“Employee (s)” refers to all full-time employees (including employee (s) undergoing probation) at Quadwave.

“Trainee(s)”/“Interns(s)” refers to all individuals undergoing training or internship at Quadwave.

“Consultant(s)”/“Contractor(s)” refers to all individuals working for a short period of time either directly or indirectly (through a vendor).

“Director(s)” refers to the member of the Board of Directors.

“Associate(s)”/“Individual(s)” refers to all directors, employees (permanent, trainees, contractors, advisors, interns, consultants, casual workers, and agency staff, and anyone acting on behalf of Quadwave.

“Third Party” refers to any individual or organization engaged with Quadwave, including actual or potential clients, customers, suppliers, distributors, business contacts, agents, advisers, business associates (including rainmakers etc.), government, non-government organizations, public bodies, including their advisors, representatives and officials, politicians, and political parties.

“Management Group” refers to all directors and employees responsible for leadership.

## 5 Quadwave’s Mission

To help businesses realize their technology dreams first time, every time, all the time through creativity, competence and integrity.

## 6 Quadwave’s Vision

To deliver success for our stakeholders: Clients, employees and investors.

## 7 Quadwave’s Values

We act with responsibility and integrity in tune with Quadwave’s 5C values.

#### **Q-5C**

- ✓ Customer focus - "Exemplify customer focus by understanding, meeting, and exceeding the needs and expectations of clients."
- ✓ Creativity - "Nurture creativity to innovate and deliver client services beyond expectations."
- ✓ Competency - "Committed to constantly strive to achieve pursuit of proficiency."
- ✓ Credibility - "Ethical, honest, and dedicated to doing what is right in all our operations."
- ✓ Collaboration - "Harmonious synergy in working together to achieve shared goals and create collective value."

### **7.1 Quadwave's Values in Action:**

#### **Customer Focus**

Being customer-focused means placing our clients at the heart of everything we do. It's about actively listening to their needs, not just meeting those needs but going above and beyond to exceed their expectations. We should commit to delivering not just products or services but exceptional experiences that truly resonate with our customers and build lasting relationships.

#### **Creativity**

We should encourage ourselves and our team to push the boundaries of conventional thinking, explore novel ideas, and devise ingenious solutions. This means fostering an environment where creativity is not just welcomed but celebrated. We should infuse creativity into our work and provide solutions that are not only effective but truly exceptional.

#### **Competency**

We should actively seek opportunities to enhance our proficiency through learning, training, or real-world experiences. It's about staying at the forefront of our respective fields, striving for excellence, and never resting on our laurels. We should commit to being the best at what we do what we deliver, and continually pushing the boundaries of our abilities.

#### **Credibility**

We should not merely adhere to rules and regulations; it's about earning the trust of those we serve.

To uphold our credibility, we should be ethical, fair, and transparent in our operations and decision-making. This commitment extends to every action we take, ensuring our integrity remains unblemished and our word is our bond. Credibility means our clients/stakeholders can rely on us to consistently act with honor, integrity, and dedication to ethical excellence.

#### **Collaboration**

We should put cohesive efforts that draw upon every individual's unique strengths and perspectives, uniting them in a collective pursuit.



In collaboration, we should exchange ideas and skills to lead innovation, gain efficiency, and achieve shared goals. It's about weaving a tapestry of talents and expertise to leave an impactful and lasting imprint on the collective achievement of all our deliverables.

## **8 Our Responsibilities**

### **8.1 Individual's Responsibilities**

It is the responsibility of every associate of the Company to:

- Familiarize themselves with the contents of the code, understand it, and adhere to it.
- Participate promptly in all mandatory training sessions related to the code and other Company policies and procedures.
- Gain knowledge of the significant legal and ethical considerations that pertain to their respective roles and job performance.
- Ensure strict compliance with all applicable laws, regulations, and Company policies and procedures.
- Conduct themselves with integrity and a sense of responsibility, safeguarding the Company's reputation and interests, even when no explicit law or policy is being infringed.
- Seek advice or clarification from the Ethics Committee whenever they encounter uncertainty about the correct course of action.
- Promptly report any known or suspected instances of misconduct to the Ethics Committee.

### **8.2 Management Group's Responsibilities**

It is the responsibility of the Management Group of the Company to:

- Exemplify ethical and responsible behavior, serving as the organization's role models.
- Ensure that team members are well-informed about the relevant laws, regulations, and Company policies pertaining to their areas of responsibility and that they receive comprehensive guidance to execute their roles as per the principles outlined in the code.
- Continuously monitor conduct and practices within their respective areas of responsibility to guarantee that the team consistently operates ethically.
- Cultivate an atmosphere of transparency and trust, wherein team members feel secure and at ease when seeking clarifications or voicing concerns.
- React promptly and effectively to instances of non-compliance, including escalating issues to respective authorities within the Company.

## **9 Workplace Culture**

### **9.1 Open Communication**

We expect open, honest, and regular communication amongst all employees, irrespective of their levels/ranks. We encourage one-on-one meetings between the employees and their managers. These meetings are an opportunity for mutual learning and information exchange, and they provide an opportunity to explore ideas and issues. Feel free to discuss candidly complaints and concerns with the manager to prevent or resolve them quickly.

Generally, a thorough discussion of issues can solve job-related problems. If the concerns are not resolved in an open discussion with the manager, the Talent Management can facilitate and offer advice for resolution.

We adopt an open-door policy, which ensures the availability of executives at all levels of management to voice employees' concerns. If a problem or an idea warrants the management review, employees may escalate it to the appropriate level without hesitation.

### **9.2 Suggestion Program**

At Quadwave, you can contribute to our success and growth by suggesting practical work – improvement or cost-saving ideas.

A suggestion is an idea that will benefit Quadwave by solving a problem, reducing costs, improving operations or procedures, enhancing customer service, eliminating waste spoilage, or making Quadwave a better and safer place to work. Statements of problems without accompanying solutions or recommendations concerning co-workers and management are not appropriate suggestions. Hence, all suggestions should be accompanied by a description of the problem or condition to be improved, with a detailed explanation of the solution or improvement and why it should be implemented. If employees have questions or need advice about their ideas, contact Talent Management.

Proportional recognition and/or an award will be given to employees whose suggestions are implemented.

Any mail in this regard can be sent to the mail id [hr@quadwave.com](mailto:hr@quadwave.com) without hesitation.

### **9.3 Equal Opportunities**

We aim to provide fair and equal opportunities irrespective of race, color, ethnicity, nationality, gender, sexual orientation, age, religion, disability, or any other characteristic protected by applicable laws and regulations. We do not engage in or support discrimination specifically in the areas related to recruitment, hiring, promotion, training, compensation, and other employment-related activities. We firmly believe that diversity enriches our workforce and contributes to our success.

### **9.4 Human Rights**

We firmly believe that human rights are fundamental and universal, extending to all workers irrespective of their specific employment status. This encompasses women, temporary, migrant, student, contract, and direct employees, leaving no room for exception.

We are committed to respecting all human rights principles that have obtained international recognition. Moreover, we promise not to be involved in human rights violations within our organization, including our core operations and business relationships with subsidiaries, partners, customers, and suppliers. We are committed to upholding and celebrating human rights in all our interactions and endeavors. For more details, please refer to our Human Rights Policy.

## **10 Harassment**

### **10.1 Sexual Harassment**

Quadwave has a zero-tolerance approach to sexual harassment or gender-based discrimination. Our goal is to create a workplace that promotes mutual respect, encourages positive relationships among our associates, and ensures that no one, including our associates, job applicants, vendors, or customers, experiences sexual harassment. For more details, please refer to our Workplace Harassment Policy.

### **10.2 Bullying**

Quadwave is against any act of bullying.

Bullying encompasses any unwelcome verbal, physical, or psychological behavior intended to harm, intimidate, or demean others. This may involve teasing, insults, threats, spreading rumors, exclusion, or any action that creates a hostile or intimidating environment for individuals in the workplace.

Any concerns about bullying can be raised to the Ethics Committee, [ethics@quadwave.com](mailto:ethics@quadwave.com), without hesitation.

### **10.3 Retaliation**

Quadwave takes a strong stance against retaliation. We ensure that employees are not subject to any form of retribution for raising concerns, reporting misconduct, or participating in investigations.

To prevent retaliation, we emphasize confidentiality and provide a proper channel for reporting. We believe this creates an environment where employees feel safe to come forward with any issues, ultimately upholding our commitment to integrity and fairness.

Anyone who believes they have experienced retaliation is encouraged to submit a written complaint to the Ethics Committee, [ethics@quadwave.com](mailto:ethics@quadwave.com).

## **11 Healthful Work Area**

### **11.1 Health and Safety**

Quadwave strongly emphasizes the well-being of all its associates and is committed to providing a working environment that is productive, safe, and good for physical and mental health. We expect all associates to maintain high standards of safety, personal hygiene, and workplace cleanliness.

Associates are obligated to abide by the health and safety guidelines and practices communicated to them by the Company regularly. Moreover, we encourage them to promptly report any workplace safety or health concerns to the Ethics Committee.

Associates are encouraged to attend safety training sessions as and when organized by the Company to further enhance safety awareness and promote the adoption of secure work methods. These sessions are designed to keep our workforce well-informed and prepared for potential risks or hazards.

### **11.2 Cubicle Etiquettes**

In any work environment, it is important to be respectful of your co-workers. The below list includes the expected etiquettes to be followed but is not limited to

- Keeping your voice level low.
- If music is played, it should be played through headphones and not through external speakers.
- Phone must not be used on speakers.
- Respect the privacy of other's paperwork and personal items.
- Make personal calls in private areas.

### **11.3 Substance Abuse**

Ensuring the safety of all associates in the workplace is of utmost importance to us. The use or distribution of drugs and alcohol while at work is strictly forbidden. Furthermore, the possession and use of weapons, firearms, or ammunition during the course of conducting Company business are also prohibited.

- No associate is allowed to consume, possess, sell or purchase any alcoholic beverage on any property owned by or leased on behalf of Quadwave, or in any vehicle owned or leased on behalf of Quadwave.
- No associate may use, possess, sell, transfer or purchase any drug or other controlled substance which may alter an individual's mental or physical capacity. The term drugs do not include the ones that are medically prescribed.
- Quadwave will not tolerate employees who report for duty while impaired by the use of alcoholic beverages or drugs.

It is our policy at Quadwave, to assist employees and family members who suffer from drug or alcohol abuse. You may be eligible for a medical leave of absence, and we encourage any employee with a problem to contact your personnel representative for details.

Suppose you happen to encounter any unsafe conditions while on the job, we urge you to contact the Ethics Committee promptly.

#### **11.4 Smoking**

Quadwave is dedicated to providing a healthy environment to all its associates and, therefore, prohibits any form of tobacco consumption in company buildings. Smoking is also prohibited within five (5) feet of exterior entranceways.

## **12 Business Integrity**

### **12.1 Conflict of Interest**

A conflict of interest arises when an employee's personal, financial, or other interests interfere or appear to interfere with their ability to make fair and unbiased decisions in the best interest of Quadwave. Such conflicts can undermine our commitment to ethical conduct and damage our reputation.

To reduce conflict of interests, employees should not be concerned or interested directly or indirectly, whether solely or with others, in any trade, business, or occupation that competes with the interests of Quadwave or has the potential of causing a conflict of interest, without the prior written permission of a Director of Quadwave.

This does not prohibit an employee's right to hold shares, securities, or debentures in any other company as a bona fide investor.

### **12.2 Gifts**

In observance of various holidays and special occasions, it is customary in many regions across the globe to present modest gifts to customers, government officials, and other individuals with whom the Company maintains a business relationship. It is of utmost importance that we exercise caution during such gestures, ensuring that we neither breach any regulatory requirements nor act in violation of Company policies, all of which align with our core Q-5C values.

Under no circumstances should any associate accept gifts or hospitality from individuals who are directly or indirectly interested in Quadwave's business that conflicts with the Gift and Anti-Bribery and Anti-Corruption Policies. For more details, please refer to our Gift and Anti-Bribery and Anti-Corruption Policies.

### **12.3 Charitable Contributions**

As part of Quadwave's corporate social responsibility, we emphasize the role of charitable contributions and donations. We primarily focus our support in areas related to education, research, social welfare, disaster relief, and other humanitarian endeavors through our program called "QCares." In the process of extending our philanthropic reach on behalf of Quadwave, it is crucial to adhere to the following considerations:

- All contributions must be in strict accordance with relevant local laws and regulations.
- Contributions should be made without any expectation of business favors or returns.
- Recipients of these contributions must have no direct affiliations with Quadwave Directors or Executive Officers.
- Payments should not be in cash or deposited into any individual's account.
- Every amount contributed or donation made for charitable causes must be transparent.
- All charitable contributions must be fully compliant with our Anti-Bribery and Anti-Corruption Policy.

## **12.4 Non-Compete and Non-Solicitation**

### **Non-Compete**

Employees, contractors, and trainees of Quadwave are obliged by a non-compete agreement that restricts them from engaging in activities, employment, or business ventures that compete with the organization's business interests.

- During the period of employment with Quadwave or for a period of one year from the date of termination of services with Quadwave, employees cannot apply to accept direct or indirect employment with any direct client of Quadwave or with the client of Quadwave's client's (where the employee may be deputed on project related work, during the period of their engagement or affiliation with Quadwave)
- Any additional honorary and voluntary positions and non-compete positions may be held by an employee with complete disclosure to and written consent from Quadwave.

### **Exceptions and Prior Consent**

Individuals who intend to engage in activities that may conflict with the non-compete agreement must seek prior written consent from the organization. Exceptions may be granted based on factors such as the nature of the activity, the geographic scope, and the potential impact on Quadwave's business interests.

### **Breach of Non-Compete**

Violating this policy will render the employee liable for prosecution for determining compensation due to Quadwave.

### **Non-Solicitation**

Employees, contractors, and trainees of Quadwave are obliged by a non-solicitation agreement to protect our client relationships, employees, and contractors.

- Employees are prohibited from soliciting other employees during the period of employment and for a period of 12 months from the last day of employment in the Company.

### **Breach of Non-Solicitation**

Violating this policy will make the employee liable for prosecution to the fullest extent permitted by law, including compensatory and punitive damages. Solicitation will result in legal action.

In the event any employee, contractor or affiliate is found to be in violation of this policy, the violator agrees to compensate Quadwave by paying monetary compensation equal to ten times the greater of annual CTC last drawn from Quadwave, or paid by the new employer. In the case of contractors and affiliates, this liability will extend to the employer of the contractor or affiliate.

### **12.5 Political Activities**

Quadwave retains the right to express its stance on significant matters to duly elected representatives and other governmental figures. Under no circumstances may the Company's financial resources or assets be employed as contributions to political campaigns or political activities without the prior written consent from a Director of Quadwave. To seek such approvals, kindly contact [ethics@quadwave.com](mailto:ethics@quadwave.com). We abstain from seeking reimbursement for political donations and also from utilizing company resources for personal political purposes.

### **12.6 Comments in Public Domain**

To protect the business of Quadwave, all employees are explicitly forbidden, either during or after their employment:

- To directly or indirectly publish, or place into the public domain or to make any public appearances or comments to the media (including all areas of the public domain), any opinion, fact, or material on any matter connected with or relating to the business of Quadwave or other associated Company or client of the Company without the prior written approval of a Director of Quadwave.
- If an employee's role requires them to use social media, you should always comply with the Social Media Policy. Any requests for comments, opinions, or public appearances should be referred to a Director of Quadwave. For more details, please refer to the Social Media Policy.

## **13 Company Information and Asset Management**

### **13.1 Confidentiality**

Confidential or proprietary information, which may include personal details about clients, our organization, or other individuals obtained during your employment or association with Quadwave, should not be exploited for personal gain or to benefit third parties. We are dedicated to preserving the privacy of such personal data by employing appropriate technical and organizational safeguards. For more details, please refer to the Confidentiality Policy.

### **13.2 Company Premises and Facilities**

Quadwave's Premises and Facilities are intended for business-related activities only.

- Associates must not use Quadwave's premises, equipment, or services for their personal needs without gaining the prior permission of Talent Management.

- Associates are expected to keep their work areas tidy and organized, including proper waste disposal.
- Personal belongings brought onto company premises should be secure and not interfere with the safety, comfort, or productivity of others. Quadwave is not responsible for personal property loss, theft, or damage.
- Associates should be familiar with and adhere to the emergency protocols, including evacuation plans and assembly points, which are essential for the safety of all employees.
- Associates must not use Quadwave's address, stationery, stamps, or mailing services for personal correspondence.

### **13.3 Intellectual Property**

The Company's Intellectual Property, whether it includes trademarks, copyrights, business methods, inventions, creative works, or innovations, is valuable and an integral part of our collaborative efforts.

We are responsible for safeguarding the Company's Intellectual Property or other confidential information. We must show utmost respect for the valid intellectual property rights held by our customers, partners, and other stakeholders. Unauthorized use of their intellectual property is strictly prohibited.

### **13.4 Security of Data and Computer Systems**

We are committed to protecting sensitive data, maintaining the integrity of our systems, and ensuring a safe and secure computing environment for associates, customers, and stakeholders.

- The computer systems provided are meant to perform Quadwave's operations and should only be used for business unless there is written approval from the IT Department.
- Copies of programs or data must not be taken or removed from the Quadwave systems without the permission of a Director.
- Under no circumstances may unauthorized software be loaded onto Quadwave computers.
- Computer systems should not be used to access or store any illegal, sensitive, or discriminative material online.
- Company may monitor their use of the computer system, including emails and the internet, and may restrict access to websites not relevant to their work or limit internet use during working hours. For more details, please refer to the Confidentiality Policy.
- Users must ensure all required security steps are taken.

### **13.5 Company Property**

All Company Property, including laptops, equipment, vehicles, mobile devices, office furniture and supplies, tools and machinery, intellectual property, company records, access cards/keys, and any other assets owned by Quadwave, is the Company's exclusive ownership.

Employees are entrusted with these assets and intellectual creations for work-related purposes and are expected to use them responsibly.



In the event of resignation, termination, or upon request by the Company, employees are required to promptly return all company property and any related intellectual property, as well as access cards/keys or any other assets issued by the Company.

## **14 Financial Record Keeping and Integrity**

Maintaining the integrity of our financial records is a fundamental principle we uphold. This involves carefully preserving physical and electronic company documents and accurately recording all transactions and business activities.

Furthermore, we strictly forbid any deliberate creation of inaccurate or deceptive entries in our corporate records, regardless of the motive. Through truthful maintenance of these records, we reinforce our dedication to financial integrity and responsible corporate governance.

## **15 Seeking Help and Raising Concerns**

Should an associate/third party become aware of any significant concerns about the Company's Code of conduct and ethics, we strongly urge them to step forward and raise their concerns promptly. Such matters must be raised in a spirit of genuine goodwill.

Raise your concerns to [ethics@quadwave.com](mailto:ethics@quadwave.com).

Detailed information regarding this policy is accessible through the Whistleblower Policy.