

Policy Name	Code of Conduct Policy	Policy Prepared for	Qubify Technologies Pvt. Ltd
		Approved by	Chitranshu Sharma
Revision No	1.0	Release Date	13 th January, 2025
PURPOSE	<p>The purpose of the Code of Conduct Policy is to define and communicate the ethical standards and expectations for behavior within Qubify Technologies Pvt. Ltd. This policy serves as a guiding framework for all employees, contractors, and stakeholders, ensuring that their actions align with the company's core values, legal obligations, and professional standards. The Code of Conduct promotes integrity, accountability, respect, and transparency in all business activities, helping to create a positive and productive work environment..</p>		
SCOPE	<p>This policy applies to all employees, contractors, consultants, and any other individuals representing or acting on behalf of Qubify Technologies Pvt. Ltd. It covers a wide range of behaviors and practices, including but not limited to, interactions with colleagues, clients, and third parties, compliance with laws and regulations, conflict of interest, confidentiality, anti-corruption, and fair treatment. The scope of this policy extends to all business activities, whether conducted within the organization's premises, remotely, or in external interactions.</p>		
OWNER	<p>The ownership of the Code of Conduct Policy resides with the Human Resources (HR) Department at Qubify Technologies Pvt. Ltd.</p>		
LOG(S)	<p>Incident reported / Grievance tracker / Disciplinary Actions</p>		

1. ROLES & RESPONSIBILITIES

1.1 Employees

- Report concerns and violations to the appropriate authority.
- Maintain confidentiality of complaints.
- Help and cooperate in all investigations by the Disciplinary Authority (DA) or Enquiry Officer.

1.2 Reporting Managers (RM), Reviewing Managers, Process Heads

- Take cognizance of reported acts of misconduct.
- Be vigilant and observe any acts of misconduct.
- Maintain and provide adequate documentation to support any recommendation of disciplinary action.
- Cooperate with the HR or Enquiry Officer in investigating cases of disciplinary action and ascertaining facts.

1.3 Human Resource team / Disciplinary Authority (DA)

- Carry out initial investigation.
- Issue show cause/charge sheets.
- Conduct impartial enquiry keeping in view the principles of natural justice.
- Ensure that principles of natural justice are taken into consideration in the overall process.
- Initiate disciplinary action.
- Decide on action to be taken.
- Submit a report to the HR Head.

1.4 HR Head

- Overall process and policy ownership.
- Approve exceptions.

2. POLICY STATEMENT FOR CODE OF CONDUCT

2.1 Conflict of Interest

- **Definition:** A conflict of interest exists when an employee's private interest interferes in any way with the interests of the Company or with the employee's duty to serve the Company to the best of the employee's ability.

- **Simultaneous Employment:** Employees must not work simultaneously for a competitor, customer, vendor, or supplier, nor have a direct or indirect financial interest in, or receive compensation for, any transaction between Qubify Technologies Pvt. Ltd and any company with which it does business. Employees are also prohibited from working for a competitor as a consultant or advisor. The best policy is to avoid any direct or indirect business connection with the Company's customers, suppliers, or competitors, except on the Company's behalf.
- **Personal Transactions:** If an employee, in their personal capacity, is buying or selling property, equipment, or facility from or to a Qubify business associate, there is likely to be a divided loyalty or appearance of divided loyalty. For such transactions, prior permission of the Management must be obtained.
- **Acceptance of Gifts and Commissions:** Employees or their family members should not accept commission, profit share, loans, excessive entertainment, or gifts of more than nominal value from the Company's business associates.
- **Resolution of Conflicts:** To avoid any conflict between personal interest and that of the Company, employees dealing with suppliers, customers, or any other organization or individual seeking to do business with the Company must discuss the matter with the Business Head/HR, understand the Company's position in the matter, and resolve the conflict.

2.2 Rules and Regulations at the Workplace

The work rules and standards of conduct for Qubify Technologies Pvt. Ltd are important, and the Company regards them seriously. All employees are urged to become familiar with these rules and standards. Any employee who deviates from these rules and standards will be subject to corrective action up to and including termination of employment.

2.2.1 General Misconduct.

- **Attendance:** Absence from the workplace during the shift except during break times will result in disciplinary action.
- **Identification:** Identity Card is mandatory in the Call Centre.
- **Prohibitions:** No eatables allowed at workstations. Consumption of liquor, pan masala, smoking, and chewing tobacco within the premises is strictly prohibited.
- **Mobile Phones:** The use of mobile phones on the production floor is restricted for employees below the manager level. Violations will result in the confiscation of the mobile

phone and the issuance of a warning letter. Repeated violations by an employee may lead to termination.

- **Tele calling:** Any discrepancy found in the process will result in penalties and strict action.
- **Behavior:** Employees must maintain discipline, office decorum, and good behavior with colleagues. Relationships with subordinates and peers should be exemplary, and relationships with supervisors should be based on mutual respect and trust.
- **Work Standards:** Employees must adhere to the highest standards of dignity, decency, fairness, and integrity at all times.
- **Compliance:** Non-adherence to regulatory compliance, indulging in concurrent employment, or engaging in conflicts of interest detrimental to organizational interests will be treated as serious misconduct.
- **Data Integrity:** Integrity of data furnished, actions leading to compromising the protection of company assets, and disclosure of confidential information without authorization are prohibited.
- **Security:** Breach of information security policy and indulging in any act of sexual harassment at the workplace will result in severe disciplinary action.
- **Unauthorized Actions:** Sharing/revealing confidential information without prior written authorization, theft, fraud, willful insubordination, habitual late-coming, irregular attendance, drunkenness, gambling, collecting money without permission, sleeping on duty, and commission of acts amounting to criminal offenses involving moral turpitude are prohibited.

2.2.2 Operational Misconduct

- **System Settings:** Unauthorized changes to system settings, including EHR configurations, security protocols, or any other IT system settings, are strictly prohibited. All changes must have prior written authorization from the IT or compliance department.
- **Negligence in Duties:** Negligence in performing any assigned duties. Providing incorrect information to team members or neglecting work responsibilities that the company business is not acceptable.
- **Access Control Violations:** Sharing login credentials, using another employee's credentials to access systems, or allowing unauthorized personnel to access records or billing information is prohibited.
- **Compliance Breaches:** Any action that leads to non-compliance with any relevant industry standards. This includes failing to report security incidents, not following established compliance procedures, and disregarding regulatory updates.

2.2.3 Sexual Harassment

- **Prohibition:** Undesirable behavior with sexual overtones, including eve-teasing, unsavory remarks, jokes causing embarrassment, innuendos, gender-based insults, inappropriate physical contact, displaying offensive material, forcible physical touch, molestation, physical confinement, or abuse of authority for sexual favors, is strictly prohibited.

2.2.4 Others

- **Abetment:** Abetting or attempting to abet any act of misconduct is prohibited.
- **General Misconduct:** Any other act prejudicial to the interests of the Company will result in disciplinary action.

3. GUIDELINES TO DEAL WITH MISCONDUCT

- **Reporting:** The recipient of the complaint has the responsibility of reporting the complaint to the Reporting Manager (RM). The RM must report observed or reported misconduct to the Human Resource Team.
- **Disciplinary Action:** The HR will initiate the investigation and decide the action as per policy.
- **Confidentiality:** Sensitive disciplinary cases shall be handled with utmost confidentiality. Unauthorized disclosure of complaint details will be treated as misconduct.
- **Preliminary Evaluation:** The HR will gather all necessary documents and materials to conduct a preliminary evaluation of the facts.
- **Minor Punishments:** If the case merits minor punishment, the HR will directly impose a minor punishment on the Accused.
- **Major Punishments:** If the case merits major punishment, the HR representative will seek the help of HR Head to decide the action plan based on the severity of the incident. The HR representative shall submit a report with findings to the HR head. The Head will consider the report and decide on the future course of action.

4. GUIDELINES TO APPEAL AGAINST DECISION MADE FOR MISCONDUCT

- **Right to Appeal:** The Accused may appeal against any penalty imposed. The appeal shall lie with the authority specified in the schedule.
- **Appeal Procedure:** An appeal must be filed within 5 working days from the communication of the order. The appeal shall be addressed to the appellate authority specified in the schedule and submitted to the HR. The HR will forward the appeal with comments and records to the appellate authority within 5 days. The appellate authority will review the findings and decide on the appeal within 5 days, confirming, enhancing, reducing, or setting aside the penalty.

- **Show-Cause Notice:** If the appellate authority decides to enhance the punishment, the employee will be given a show-cause notice and an opportunity to respond before the final order is passed.

5. SCHEDULE FOR MINOR & MAJOR PUNISHMENTS

- **Minor Punishments:** Verbal warning, warning letter, censure, holding monthly incentive, suspension for a maximum of 5 days.
- **Major Punishments:** Demotion in grade and designation, reduction of salary, stoppage of annual increment/performance pay, termination of services. The list is indicative and not exhaustive.

6. EXCEPTIONS

- Any exception to this policy requires the approval of the HR Head.

7. PRINCIPLES OF NATURAL JUSTICE

- **Right to be Heard:** No person shall be condemned unheard.
- **Opportunity for Defense:** Every person must be given a reasonable opportunity for defense.
- **Fair Enquiry:** There should be a fair and impartial enquiry.
- **Evidence Rebuttal:** The Accused must be given the opportunity to rebut evidence.
- **Proportionate Punishment:** The punishment imposed must be commensurate with the nature of the offense.