



# QUALFON ADVANCED TECHNOLOGY CENTER PVT LTD

AIHP Palms Business Center, Suite 1B, Plot number 242, 243, Phase IV, Udyog Vihar, Sector 18, Gurugram, Haryana 122015

**Dheeraj Khakre**

Gauna, PO: Shirdi  
Dist: Betul,  
Madhya Pradesh- 460668

**25<sup>th</sup> January 2024**

## Internship Offer Letter

Dear Dheeraj,

Congratulations! on your selection with **Qualfon Advanced Technology Center Pvt Ltd**.

This refers to the application and your subsequent interviews and discussion; we are delighted to offer you a position of an **"Intern"**.

Your training shall commence on **5<sup>th</sup> February 2024** and shall end on **4<sup>th</sup> February 2025** (12 months).

The terms and conditions of this offer with the Company are set forth below:

1. Subject to your acceptance of the terms and conditions contained herein, your project and responsibilities during the Term will be determined by the supervisor assigned to you for the duration.
2. You will be paid a stipend during the training period of 12 months from the date of joining at the rate of **Rs.35,000 p.m.**
3. After 12 months of successful completion of training your performance will be reviewed as per the company policy and will be rewarded with an appropriate role as per company discretion/requirement.
4. During the internship period the association can be terminated from the organization side on a notice period of 15 days. However, if you decide to terminate the association without completing 12 months, then the organization reserves the right to withhold the experience letter.
5. You will sign a confidentiality agreement with the company before you commence your internship.
6. The internship cannot be construed as an employment or an offer of employment with Qualfon Advanced Technology Center Pvt Ltd.

Please confirm your acceptance of the terms of this internship offer at the earliest.

We look forward to having you onboard with us!

With Best Wishes,

For, **Qualfon Advanced Technology Center Pvt. Ltd.**

Agreed and Accepted:

Signature: dheerajkhakre  
dheerajkhakre (Jan 29, 2024 18:27 GMT+5.5)

Full Name: dheerajkhakre

Date: Jan 29, 2024

  
Neha Khurana  
Neha Khurana (Jan 25, 2024 16:08 GMT+5.5)

**Neha Khurana**  
Manager, Human Resources India  
[Neha.Khurana@Qualfon.com](mailto:Neha.Khurana@Qualfon.com)



<https://www.qualfon.com>

CIN: U74999HR2021FTC096886 | Tel: +91-8800181943 | Email: [contact\\_in@qualfon.com](mailto:contact_in@qualfon.com)



## NON-DISCLOSURE AGREEMENT AND UNDERTAKING IN RELATION TO CONFIDENTIALITY, NON -SOLICITATION AND INTELLECTUAL PROPERTY

WHEREAS this Non-disclosure Agreement and Undertaking ("the Agreement") is made on 29/01/2024 at Gurgaon between **Qualfon Advanced Technology Center Pvt Ltd.** hereinafter also referred as "Discloser" wherever applicable, which include **Qualfon Advanced Technology Center Pvt Ltd. all its branches, subsidiaries, sister companies, associates, related companies, and its clients** and **Mr./Mrs./Ms**

**Dheeraj Khakre** son/ daughter of **Baldev khakre**

resident of 66 Gauna , PO: Shirdi , DIST: Betul , Madhya Pradesh - hereinafter referred as "Recipient" to protect certain Confidential Information or Intellectual Property.

WHEREAS the Recipient will be providing services to the Discloser under the terms of employment/ contract.

(A) NOW THEREFORE, this non-disclosure agreement and undertaking is made by the Recipient with the Discloser and both parties agree that:

- (1) All designs, techniques, discoveries, inventions, ideas, improvements, specifications, drawings, works, systems, software, programs, manuals, data, details of customers, prospects, quotes, pricing, leads, materials, documentation, knowledge and information of or related to the Discloser (the "Materials") which the Recipient is working on/with, in contact with or in any way involved (whether at the premises of the Discloser or elsewhere), are confidential.
- (2) All designs, techniques, discoveries, inventions, ideas, improvements, specifications, drawings, works, systems software, programs, data, details of customers, prospects, quotes, pricing, leads, manuals, materials, documentation, knowledge and information which may now or hereafter be made, created, developed or conceived by the Recipient (whether alone or jointly with a team Qualfon Advanced Technology Center Pvt Ltd.) in the course of, in connection with, arising out of or resulting from (or which may reasonably be expected to be in the course of, in connection with, arising out of or resulting from) the provisions of services to the Discloser under the Agreement and Undertaking (the "Invention") shall be the sole property of the Discloser.
- (3) The Material, the Invention, and all rights, ownership, copyrights, trademarks, title, interest, and other intellectual property rights therein are the exclusive property of the Discloser.
- (4) All information relating to the customers of Qualfon Advanced Technology Center Pvt Ltd. shall be deemed to be protected by data protection, secrecy, or confidentiality provisions under the laws of the respective countries where the Discloser is operating.
- (5) The Material, Invention, all rights, ownership, copyright, trademarks, title, interest, and other intellectual property rights as stated in A (3), and the information as stated in A (4) are hereinafter individually and collectively referred to as the "Protected Material".



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(B) The Recipient in his/her capacity as an employee of Qualfon Advanced Technology Center Pvt Ltd. Hereby declares and undertakes that:

- (1) **The Recipient not have** or gain access to any information relating to the customers of Qualfon Advanced Technology Center Pvt Ltd., will refrain from doing or taking any steps or actions which may lead to Qualfon Advanced Technology Center Pvt Ltd. breaching any data protection, secrecy, or confidentiality provisions which Qualfon Advanced Technology Center Pvt Ltd. is obliged to observe in any parts of the world and will strictly observe all such data protection, secrecy, or confidentiality provisions.
- (2) **The Recipient will hold** all Material in the strictest confidence, and will not give, divulge, publish, or reveal the Material to any party save as expressly authorized by the Discloser in writing.
- (3) **The Recipient will not copy** the whole or any part of the Material save as expressly authorized by the Discloser in writing.
- (4) **The Recipient will not disclose, use, assign, transfer, sell or otherwise deal** in the Material, or use on behalf of or make available to any party, the Material save as expressly authorized by the Discloser in writing.
- (5) **The Recipient** will promptly disclose/ communicate to Qualfon Advanced Technology Center Pvt Ltd. the existence or likely existence of any of the Invention, and will promptly do or take all such steps or actions (including to execute any assignment of rights or any documents) as Qualfon Advanced Technology Center Pvt Ltd. may require to perfect or enforce its rights over, or obtain protection for, any of the Invention in any part of the world at Qualfon Advanced Technology Center Pvt Ltd.'s cost.
- (6) **The Recipient will not disclose** to any party the purpose(s) for which the Recipient have been engaged for Qualfon Advanced Technology Center Pvt Ltd. nor the existence or contents of this Acknowledgement and Undertaking save as expressly authorized by Qualfon Advanced Technology Center Pvt Ltd. in writing.
- (7) **The Recipient** will take all steps and actions as may from time to time be necessary to protect the Material and to ensure his/her compliance with all obligations under this Acknowledgement and Undertaking and will refrain from doing or taking any steps or actions which may lead to the Recipient's breaching any of obligations under this Acknowledgement and Undertaking.
- (8) **The Recipient will promptly inform the Discloser** if any of my obligations under this Acknowledgement and Undertaking is or appears to have been breached.
- (9) **The Material shall be returned/knowledge transfer/handed over by the Recipient to the Discloser** upon the termination of the employment and the Recipient undertakes not to retain any copies (hard or digital) or replicas thereof.



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- (10) **The Recipient agrees** that he/she will destroy and provide necessary evidence that any data related to the company or its associates/customers/principals/employees in its possession at the time of termination of employment is returned or destroyed and will be fully responsible for using it in any form thereafter.
- (11) **The Recipient agrees** and irrevocably undertakes that he/she will not solicit work, directly or indirectly from Qualfon Advanced Technology Center Pvt Ltd.'s clients/principals/suppliers/business associates or its holding or subsidiary entities to or from whom services are rendered or proposed to be rendered by/to Qualfon Advanced Technology Center Pvt Ltd. or all its branches, subsidiaries, sister companies, associates, related companies, and its clients. This clause shall survive the expiry or termination of this Non-disclosure Agreement and Undertaking for a minimum period of 36 months.
- (12) **The Recipient undertakes** not to solicit or be a party directly or indirectly to solicitation by others the employees of the company. This clause shall survive the expiry or termination of this Non-disclosure Agreement and Undertaking for a minimum period of 36 months.
- (13) **The Recipient** will indemnify Qualfon Advanced Technology Center Pvt Ltd. and keep Qualfon Advanced Technology Center Pvt Ltd. indemnified against all losses, costs, expenses, claims and liabilities whatsoever which Qualfon Advanced Technology Center Pvt Ltd. may suffer or incur in connection with his/her breach of any of his/her obligations under this Non-disclosure Agreement and Undertaking.
- (14) The obligations and liabilities arising under this Non-disclosure Agreement and Undertaking shall continue and remain in force during the term of employment and even after the expiry/termination of the employment and/or the Recipient's contact with the Material, for period of 36 months from date of such expiry/termination of the employment/ contract.

## Declaration

I do hereby affirm that I shall abide by the terms of the NDA and any other policy of the organization. And the organization reserves the right to take any action in case of breach of the said agreement.

For, **Qualfon Advanced Technology Center Pvt. Ltd.**

Neha Khurana

Neha Khurana (Jan 29, 2024 16:31 GMT+5.5)

**Neha Khurana**  
**Manager, Human Resources - India**  
[Neha.Khurana@Qualfon.com](mailto:Neha.Khurana@Qualfon.com)

**Agreed and Accepted:**

dheerajkhakre

**Signature:** dheerajkhakre (Jan 29, 2024 18:27 GMT+5.5)

**Full Name:** dheerajkhakre

**Date:** Jan 29, 2024



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CIN: U74999HR2021FTC096886 | Tel: +91-8800181943 | Email: [contact\\_in@qualfon.com](mailto:contact_in@qualfon.com)



## Employee Code of Conduct

### Purpose

The Employee Code of Conduct outlines standards of personal and professional conduct that all employees must strive to always uphold and behave in an ethical and professional manner. The Code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe, and free from harassment and discrimination. It will also assist managers to induct employees into the Qualfon Advanced Technology Center Pvt. Ltd. and address any circumstances that may arise which conflict with the stated standards and Values.

### Scope

The Employee Code of Conduct provides clear guidelines and standards for the appropriate behavior expected of Qualfon Advanced Technology Center Pvt. Ltd.

### Process

This Code of Conduct provides a framework for appropriate behavior for all Qualfon Advanced Technology Center Pvt. Ltd. Employees where they can address ethical issues, which employees and management:

- conduct themselves towards other employees or colleagues, employees' representatives and their representatives, government authorities and clients.
- perform their duties and obligations fulfil the mission, goals, and objectives of Qualfon Advanced Technology Center Pvt. Ltd. and
- practice fairness and equity.

The Code of Conduct is established on the following organizational values: integrity, honesty, conscientiousness, compassion, courtesy, fairness, and respect. This relies on individuals being responsible for their own professional behavior within the provisions of this code, Qualfon Advanced Technology Center Pvt. Ltd. policies, legislation and relevant industrial clauses that apply to individual contracts of employment.

Where there is doubt as to the application of the Code, or the appropriate course of action to be adopted, employees affected should discuss the matter with their manager.



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## 1. HR Team/Managers/Supervisors responsibilities

HR Team/Managers are responsible and accountable for:

- Undertaking their duties and behaving in a manner that is consistent with the provisions of the Employee Code of Conduct.
- Informing employees in their teams about the Employee Code of Conduct, relevant policies, procedures, and minutes.
- Providing appropriate training and/or performance counselling to ensure the required standard is met.
- Reporting any departure from the Employee Code of Conduct by themselves or others.
- Acting consistently and fairly in dealing with behaviour that breaches this code.

## 2. Employees responsibilities

All employees have a responsibility to:

- Be personally responsible and accountable for their own performance, behaviour, and attendance in the workplace.
- Undertake their duties and behave in a manner that is consistent with the provisions of the Employee Code of Conduct.
- Report any departure from the Employee Code of Conduct by themselves or others.
- Comply with policies and procedures.
- Promote a positive, safe, and healthy environment in the conduct of their work.

## 3. Personal conduct

Attendance and punctuality:

- Employees are expected to be punctual and regular in their attendance.
- When an employee is unavoidably absent from work due to sickness or any other reason, the employee should telephone their manager (or appropriate delegate) promptly (preferably before their normal starting time) and indicate their likely return to work.
- Managers may exercise their responsibility to contact employees who have not contacted them directly within a reasonable timeframe to ascertain the reasons for that individual's absence.
- Employees wishing to extend their leave must arrange this before commencing the leave. If the employee is on leave, they must speak to their immediate manager at least 2 working days before their leave ends.

## 4. Dress and Appearance

Qualfon Advanced Technology Center Pvt. Ltd. is well-recognised and respected and projects a particular image to our clients. Employees must therefore ensure that their appearance is neat, clean, and appropriate for their area of work. A high standard of personal hygiene is always expected.

The Manager/HR Team is responsible for determining the dress code appropriate to the environment while the manager can make exceptions for medical purposes.



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Casual business wear is defined as:

- trousers, pants, skirts, suits sarees
- modest shirts, blouses, jumpers, cardigans, non-sports jackets
- denim jeans or leggings
- any form of sports shoes (including joggers or runners), thongs, slippers, or dilapidated footwear
- athletic wear
- torn or ripped clothing (even if 'designer' tears)
- unsuitably revealing clothing (including backless tops or dresses, or garments that reveal the midriff)
- any clothing displaying offensive messages including racist or similar.

## 5. Personal behaviour

Employees are required to undertake their duties in a professional, responsible, conscientious, and ethical manner and to act in the best interests of the Qualfon Advanced Technology Center Pvt Ltd. They are expected to act honestly in all their duties when dealing with clients, suppliers, contractors, and fellow employees.

## 6. Natural justice, fairness, and equity

If an employee is required to investigate complaints against other employees or issues affecting employees, they must act consistently, promptly, and fairly and in a timely manner. The principles of natural justice must be maintained in dealing with each investigation.

## 7. Use of facilities and equipment

Employees should take all possible care when using Qualfon Advanced Technology Center Pvt Ltd property, goods, intellectual property, and services and ensure they are used efficiently, carefully, and honestly. Unless permission has been granted by the employees' manager, Qualfon Advanced Technology Center Pvt Ltd. resources are not to be used for private purposes.

## 8. Privacy and use of personal and official information

Employees have an obligation to ensure that professional information is secured against loss, misuse or unauthorised access, modification, or disclosure.

Employees have a duty to maintain the confidentiality, integrity, and security of official information for which they are responsible.

## 9. Records management

Employees need to be aware of their record keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures.

All employees must therefore ensure that Qualfon Advanced Technology Center Pvt. Ltd. documents are not placed in unofficial or private filing systems but place such documents in official files.



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Employees must not remove documents from official files. They are controlled records, and must be complete, up-to-date, and capable of providing organisational accountability when officially scrutinised.

Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule, which has been approved by the Chief Executive Officer.

## 10. Information technology

Employees must not access information which they are not authorised to access or use and must not allow any other person access for any reason.

Employees must take all reasonable precautions, including password maintenance and file protection measures to prevent unauthorised access and have an obligation to maintain the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement.

## 11. Conflict of interest

If an employee becomes aware of the potential for conflict of interest, then they must notify their manager of the potential or actual conflict of interest. Qualfon Advanced Technology Center Pvt Ltd expects employees to:

- declare any likely conflict of interest to supervisors; and
- avoid any detrimental outcome because of a conflict of interest.

If a conflict of interest arises where an employee:

- engages or is likely to engage in activities or advances, or
- is likely to advance personal or other interests at the expense of Qualfon Advanced Technology Center Pvt Ltd interests or the interests of other employees, Qualfon Advanced Technology Center Pvt Ltd may then intervene.

Employees must ensure that there is no conflict or incompatibility between their personal interests, whether pecuniary (eg money) or non-pecuniary and the impartial fulfilment of their duties. It is not possible to define all potential areas of conflict of interest, but a number of situations are referred to below.

- Gifts and hospitality offered where there is an expectation of a return favour (which may or may not be to the detriment of the Qualfon Advanced Technology Center Pvt Ltd).
- Additional employment that prevents or hinders the performance of a person in their role.
- Decisions regarding the employment or promotion of relatives or friends
- Promotion of or soliciting for clients for own private business



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If an employee is in doubt as to whether a conflict exists, they must contact their manager or HR Team. Wherever possible employees should disqualify themselves from situations of conflict of interest.

Where an employee has an impartiality, financial or proximity interest in any matter regarding provisions outlined within this Code, or which might be perceived as conflicting with the interest of another person who may be affected then the employee must immediately disclose this to the HR Team or at the meeting if prior disclosure is not possible.

## 12. Financial interests

Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or the Qualfon Advanced Technology Center Pvt Ltd objectives or activities.

Financial conflict of interest may arise where an employee, who has a financial interest in a company or other business, is able to influence contracts or transactions between the Qualfon Advanced Technology Center Pvt Ltd. and that business. This conflict may extend to any business undertaking in which employees and their immediate family, or the employees is acting in direct competition with the Qualfon Advanced Technology Center Pvt Ltd. activities or interests for personal gain.

## 13. Acceptance of commissions, gifts, or benefits

Employees should not accept a gift, secret commission or a benefit from a person or organisation outside the Qualfon Advanced Technology Center Pvt Ltd. if the intent of the gift or the benefit is to induce the employee to waive or reduce requirements or to extend a financial or other benefit to a person or organisation outside the Qualfon Advanced Technology Center Pvt Ltd. to the detriment of the Qualfon Advanced Technology Center Pvt Ltd.

As a rule, no employee should accept a gift or benefit if it could be seen as intended or likely to cause that person to:

- perform their job in a particular way, which the person would not normally do, or
- deviate from the proper or usual course of duty.

Gifts of a nominal value generally used for promotional purposes by the donor, or moderate acts of hospitality may be accepted by employees.

The employee must advise their manager of any gifts and benefits they have received as soon as the gift or benefit is received and must not take advantage or seek to take advantage of their position to obtain a benefit, either for themselves or for someone else.



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## 14. Influence on secure advantage

No employee shall elicit the improper influence or interest of any person to obtain promotion, transfer, or other advantage.

## 15. Use of official information

While employees can contribute to public debate on social issues there are some circumstances in which public comment is inappropriate. Public comment by employees should not imply that the comment, although made in a private capacity, is in some way an official comment by Qualfon Advanced Technology Center Pvt Ltd. The employee may only disclose official information, with due regard to confidentiality, in order that it is in their official capacity and duties.

An employee can disclose confidential or restricted information or documents acquired in the course of their employment only when required to do so by law, in the course of their duty, when called to give evidence in court, or when proper authority has been given. Approval to release confidential information on employees should be sought from the Management.

In circumstances where employees are requested to provide information, they should provide it in a timely and accurate manner and which complies with the principles of Freedom of Information, confidentiality, and the rights of the individual.

Employee's acting in honorary capacities may be asked by third parties to make comment on Qualfon Advanced Technology Center Pvt Ltd. policy or procedure and in such cases, employees should confine comments to information. Where employees are privy to information of a restricted nature, which may compromise the position of the Qualfon Advanced Technology Center Pvt Ltd. or infringe on the privacy of members of Qualfon Advanced Technology Center Pvt Ltd., the information should not be divulged.

## 16. Employee/client boundaries

The term 'employee/client boundaries' identifies the importance of the trust inherent in the relationship between employees and their clients however, breaching of employee/client boundaries is going outside the limits of the employee/client relationship.

Employees are expected to maintain proper boundaries with clients. Employees are expected to make themselves aware of any workplace and/or program-specific policies/guidelines in this area.

## 17. Relatives and close friends

A conflict of interest may arise where an employee makes or participates in decisions affecting another person with whom they have a personal relationship (such as a relative, spouse, close friend, or personal associate).

In cases where a conflict may arise, employees must advise their manager/HR Team. Wherever possible employees should disqualify themselves from dealing with those persons in such situations.



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## 18. Personal and professional behaviour

Employees should perform the duties associated with their position to the best of their ability, diligently, impartially, and conscientiously. In the performance of their duties, employees should:

- comply with legislative and industrial obligations and administrative policies.
- fulfil their Equal Employment Opportunity and Occupational Safety & Health obligations.
- strive to keep up to date with advances and changes in the knowledge and the professional and ethical standards relevant to their areas and expertise.
- maintain adequate documents to support decisions made.
- treat all persons with courtesy and sensitivity to their rights and provide all necessary and appropriate assistance.
- not take or seek to take improper advantage of any official information gained in the employment with Qualfon Advanced Technology Center Pvt Ltd.
- not harass or discriminate against employees or in work practices on the grounds of sex, pregnancy, race (including colour, ethnic background or national identity), marital status, disability, sexual preference, political or religious belief, or age
- act responsibly when becoming aware of any unethical behaviour or wrongdoing by any employee. Such information should be forwarded to the HR Team
- continuously improve work performance. All employees should actively pursue quality improvements.
- not make disparaging remarks about other employees

## 19. Alcohol and substance abuse or misuse

Employees must ensure that the safety and health of other employees, volunteers and clients are not endangered by any misuse. The Qualfon Advanced Technology Center Pvt Ltd. expects employees to perform their jobs with skill, care, and diligence. Employees should not perform any act or omission that is likely to have a detrimental effect on their work performance and that of other employees and clients. Accordingly, employees should not be under the influence of alcohol or other substances while they are at work or at work functions.

Possession, use or trafficking in illegal drugs on the premises is not permitted. The Qualfon Advanced Technology Center Pvt Ltd. premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces. Any such activity will be immediately referred to the police and the Qualfon Advanced Technology Center Pvt Ltd. may take disciplinary action, which may include termination of employment.

Employees must notify the manager/HR Team if the taking of, or failure to take, prescribed medication is likely to affect their performance and/or affect the safety of any person at the workplace. This is to ensure workplace safety is not jeopardised and that any performance impact is properly managed. It is the responsibility of employees to follow the directions/precautions for any drugs prescribed by a health professional for individual use and/or commercially available preparations that may impact their capacity.



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## 20. Smoking

Passive smoking can impact on other employees, the community and create a poor image of the Qualfon Advanced Technology Center Pvt Ltd, which does not promote or encourage smoking. Smoking is not permitted in Qualfon Advanced Technology Center Pvt Ltd. owned or leased vehicles or buildings.

Employees may only smoke in their own time during authorised breaks as set out in the award, agreement, or employment contract and/or as authorised individually by their manager.

## 21. Policies

Employees are responsible to carry out and comply with the Qualfon Advanced Technology Center Pvt Ltd. policies and procedures and legislation. It is acknowledged that employee views, on matters, may differ from the Qualfon Advanced Technology Center Pvt Ltd, however such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting the Qualfon Advanced Technology Center Pvt Ltd objectives.

## 22. Compliance with lawful instructions

Employees must comply with any lawful instruction given by any person having authority to make or give such an instruction.

## 23. Bullying

Bullying is unreasonable behavior that is directed against an individual or group by another individual or group and is derived from the misuse of power over the target of the behavior. This may include:

- verbal abuse, shouting.
- excluding or isolating behavior
- deliberately withholding information vital for effective work performance
- giving employees impossible assignments
- physical abuse

Bullying is unacceptable conduct within the Qualfon Advanced Technology Center Pvt Ltd. and all reported incidents will be investigated.

Whilst it is the responsibility of all employees within the Qualfon Advanced Technology Center Pvt Ltd. to ensure that premises and facilities are free from harassment, managers have a particular and clear responsibility to meet this requirement. Managers who become aware of serious breaches of policy must immediately notify their manager or the HR Team



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## 24. Discrimination and Equal Employment Opportunity (EEO)

Anti-discrimination laws provide guidelines on respecting personal difference. Treating people differently based on personal characteristics is unlawful. The following are examples of attributes: age, industrial activity, parental status, political belief, personal association, race, ethnic background, carer status, marital status, pregnancy/potential, lawful sexual activity, unrelated criminal record, impairment, religious belief/activity, physical features, gender identity, disability, and sex.

Discrimination is unacceptable conduct within the Qualfon Advanced Technology Center Pvt Ltd. And all reported incidents will be investigated.

## 25. Harassment

Harassment is any type of behaviour that:

- the other person does not want and does not return.
- offends, embarrasses, or scares them, and may be either sexual or non-sexual in nature.
- targets them because of their race, sex, pregnancy, or other protected attribute under the law.
- constitutes a form of bullying.
- harassment does not have to be a series of incidents or an ongoing pattern of behaviour. Neither does harassment need to be intentional to attract disciplinary action. Harassment can occur in any work-related context including:
  - Social functions
  - Conferences
  - Office social gatherings
  - Business trips

Harassment and discrimination form part of a continuum of unacceptable behavior that can include sexual assault, stalking and harassing phone calls, some of which are also against criminal law, which means the police may prosecute anyone who commits such acts.

Fair discipline, performance counselling or workplace control practices based only on performance issues do not, in themselves, constitute harassment.

## 26. Racial and religious vilification

Racial and religious vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity. Racial and religious vilification is a form of harassment and discrimination and is unacceptable conduct in the Qualfon Advanced Technology Center Pvt Ltd. All reported incidents will be investigated.

## 27. Occupational safety and health



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Qualfon Advanced Technology Center Pvt Ltd. is committed to providing a safe and healthy workplace for all employees and visitors however, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far as is reasonably practical.

It is therefore important that employees are familiar with the standards or procedures in their particular area of work. If employees have not been advised of these standards or procedures during the induction process, they must as a matter of urgency ask their immediate manager to obtain the necessary information.

All employees are responsible for:

- knowing and complying with the OSH rules and guidelines
- working so as not to endanger themselves or any other person by any act or omission.
- use and follow OSH instructions, training, or other information.
- report all incidents, accidents, injuries, and hazards to management for action.

## 28. Professional development

Employees must continually strive to improve their professional competence, maintain their knowledge, and encourage the development of their skills and competence of associates.

## 29. External employment

Qualfon Advanced Technology Center Pvt Ltd. will not restrain employees from working outside business hours provided that the employees do not undermine or compromise the Qualfon Advanced Technology Center Pvt Ltd. Employees should not engage in such employment, if that employment:

- places them in conflict with their official duties or would lead to the perception that they have placed themselves in conflict with their duties.
- is likely to affect their efficiency in the performance of their duties; or
- involves the use of Qualfon Advanced Technology Center Pvt Ltd. resources for private purpose without authorisation or recompense.

Subject to current policies, employees may not accept outside payment for activities, which would be regarded as part of their normal work activities.

## 30. Ownership of products and copyright

All products, literary, computer programs, material in written or other format, discoveries, inventions and improvements in relation to such matters, together with all copyright and intellectual property created, authored, discovered, developed or produced by the employee for the purpose of, or in the course of, the employee's employment will remain the property of the Qualfon Advanced



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Technology Center Pvt Ltd. and will not be used by the employee other than for the purpose of Qualfon business.

Unless otherwise agreed, the Qualfon Advanced Technology Center Pvt Ltd. retains the copyright of work produced by you during your employment with the Qualfon Advanced Technology Center Pvt Ltd.

Upon termination of employment the employee will return all correspondence, documents, data, information, equipment, and things, including copies thereof, belonging to the employer that may be in the employee's possession, custody or control.

### 31. Public conduct and media contact

Employees making comments in a public forum on any matter relating to the Qualfon Advanced Technology Center Pvt Ltd. must act in a way that is in keeping with the values and protects the reputation of the Qualfon Advanced Technology Center Pvt Ltd. Only authorised personnel may speak with the media on behalf of the Qualfon Advanced Technology Center Pvt Ltd. Employees are not permitted to speak with media representatives without first receiving clearance from the HR/Management.

### 32. Misuse

Employees must not deliberately misuse Qualfon's equipment, assets, or the services of other Qualfon personnel. When using Qualfon Advanced Technology Center Pvt Ltd. equipment, employees are required to follow the instructions provided to avoid personal injury and/or maintenance and replacement costs. Examples of misuse include:

- copying computer software programs regardless of whether the programs are protected by copyright.
- use of the Qualfon Advanced Technology Center Pvt Ltd. letterhead paper or postage when corresponding on personal or other matters not directly related to the Qualfon Advanced Technology Center Pvt. Ltd.
- unauthorised use of the Qualfon Advanced Technology Center Pvt Ltd. Logos.
- Falsifying, manipulating, or destroying business records without specific authorisation.
- Using the Qualfon Advanced Technology Center Pvt Ltd. equipment for personal commercial gain.

Employees provided with vehicles (private or commuter use) are expected to use them in accordance with the Qualfon Advanced Technology Center Pvt Ltd. policy and guidelines.

### 33. Confidentiality

Employees may have access to personal or commercial information relating to individuals, the public, or the financial or other operations of the Qualfon Advanced Technology Center Pvt Ltd. This information is to be used for Qualfon purposes only and should remain secure and confidential. It is important that the community has confidence that information acquired by the Qualfon Advanced Technology Center Pvt Ltd. is only used for the stated purposes for which it was collected.



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Employees must not discuss or release to any unauthorised person and/or anyone outside of the Qualfon, any confidential or sensitive information relating to the Qualfon Advanced Technology Center Pvt Ltd and/or its operations.

## 34. Grievance handling

It is expected that as a first step, employees will attempt to resolve the issues between themselves. Where this is not appropriate or does not result in a satisfactory resolution a more formal procedure as outlined in the Grievance – Resolving Issues and Concerns Policy can be applied. The dispute resolution process will operate within the following principles: Confidentiality, Impartiality, Promptness, Sensitivity, Courtesy and Respect. Disputes may be resolved in a formal or informal manner. Where possible, as a first step and with the agreement of both parties, the dispute may be resolved informally. If the dispute is not resolved at the informal level, then the formal process provides graduated steps for further discussion and resolution at high levels of authority. A formal resolution requires a thorough investigation to be undertaken by Grievance Handling Committee, and the process documented. Grievance Handling Committee will investigate a complaint or allegation of behaviour that is contrary to these standards. Investigations will be carried out with sensitivity and fairness and maintain confidentiality.

## 35. Breaches of the Code

The Qualfon Advance Technology Center Pvt Ltd. is committed to the standards set out in the Employee Code of Conduct. Where a breach of the Code has been identified by the Qualfon Advance Technology Center Pvt Ltd. a response to the breach may result in:

- counselling
- disciplinary action
- termination of employment
- suspension; or
- laying of criminal charges or civil action.

## 36. Terminology

- Employees refer to general employee.
- Personal information means any information about an identified or identifiable individual that is not available in the public domain.
- Records management is the control and management of records to meet business, legal, fiscal, and administrative requirements. It is a business imperative, a corporate responsibility and a critical function performed through the collective actions of individuals
- A record is recorded information in any form, including data in computer systems, created, or received by any employees of the (insert name of organisation) in the course of his/her duties.
- Conflicts of interest are assessed in terms of the likelihood that employees possessing a particular interest could be influenced, or might appear to be influenced, in the performance of their duties.
- Public comment includes public speaking engagements, comments on social media; and expressing views in letters to the newspapers or in books, journals or notices, or where it might be expected that the publication or circulation of the comment will spread to the community at large; and
- Senior Officer means the Management Team, Executive Managers



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## 37. Email

Employees may only use e-mail and web browsing for work related purposes and that all email and web access logs will be monitored for compliance with the staff position. As the organisation has responsibility for its computer systems and networks, it has the right to make directions as to its use.

Informing people about the personal information that is collected, held and what is done with it is an important privacy principle.

## 38. Mobile Phone Usage

Employees may use their personal mobiles for urgent and short conversation. While using the personal mobile phone will ensure move out of the workplace and talk and take care of not disturbing the office decorum and work of other individuals and use mild and general ring tones.

## Employee Code of Conduct

### Statement

By signing this statement, I declare that I acknowledge and agree to abide by this Qualfon Advance Technology Center Pvt Ltd. Employee Code of Conduct.

Signature dheerajkhakre  
dheerajkhakre (Jan 29, 2024 18:27 GMT+5.5)

Name dheerajkhakre

Date Jan 29, 2024





**“ACCEPTABLE USE POLICY”****POLICY**

Code: SPIS002

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## “ACCEPTABLE USE POLICY”

### POLICY

Code: SPIS002

### 1 Purpose.

The purpose of this Policy is to set forth the policy regarding the acceptable use of Information Resources:

- ✓ The inappropriate use of Information Resources exposes Qualfon to risks including, but not limited to the compromise of systems and services, legal issues, financial loss, and damage to reputation.
- ✓ The boundaries of “Acceptable Use” of all Qualfon Information Resources. The policy is based on the principle that the digital information environment is provided to support Qualfon business and is intended to promote the efficient, ethical and lawful use of these resources.
- ✓ The acceptable use, standards, and rules of behavior for company and personally owned devices (Bring Your Own Device, BYOD) used either for business at Qualfon or for work@home.

### 2 Scope.

This Policy applies to all users of Qualfon Information Resources, to all employees (part-time or full-time, temporary or permanent), service providers, consultants, agents, representatives, vendors, contractors, and any other person or entity supporting Qualfon (collectively “Users”). This Policy applies to all electronic and computing devices owned by the company or individuals, and network resources that are owned or leased by Qualfon or otherwise made available to Qualfon.

### 3 Roles and Responsibilities.

- **Users of Qualfon’s Information Systems Assets:** it is the responsibility of all Users to familiarize themselves with, keep up to date with, and comply with all security policies.
- **Qualfon Work@Home User:** it is the responsibility of every work@home user to know and have signed a work@home agreement, and to conduct their activities in a manner consistent with this Policy. Employees are responsible for exercising good judgment regarding the reasonableness of personal use. The employee assumes full liability for risks including, but not limited to, the partial or complete loss of company and personal data due to an operating system crash, errors, bugs, viruses, malware, and/ or other software or hardware failures, or programming errors that render the device unusable. Qualfon IT does not support personally owned devices.

### 4 Enforcement.

Qualfon Information Security and related policies, standards and guidelines shall be enforced across the entire organization by developing, implementing, monitoring and enforcing the appropriate safeguards, which shall be governed by relevant Qualfon standards and guidelines.

#### 4.1 Consequences of Non-Compliance.

Non-Compliance with information security policies, standards and procedures is grounds for disciplinary action up to and including termination as well as other legal remedies which are available to Qualfon.

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## “ACCEPTABLE USE POLICY”

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## 5 Policy Statement.

### 5.1 General Use and Ownership.

- 5.1.1 Qualfon defines acceptable business use as activities that directly or indirectly support the business.
- 5.1.2 All Qualfon information systems shall only be used for proper and authorized business purposes in serving the interests of Qualfon and its clients.
- 5.1.3 All Users shall comply with security awareness training periods and programs established in the workplace.
- 5.1.4 Under no circumstances is any User allowed to engage in any activity that is unauthorized, improper or unlawful while utilizing Qualfon information resources.
- 5.1.5 Qualfon systems are constantly monitored and audited for compliance with all applicable policies.
- 5.1.6 Any data that is created, transmitted through and/or stored on Qualfon systems shall be property of Qualfon or Qualfon's client.
- 5.1.7 Users shall not attempt to access any data, networks, systems or applications for which they do not have authorization, or for an improper or unlawful purpose.
- 5.1.8 Users must not interfere with or attempt to subvert Qualfon system management, monitoring or security software installed on Qualfon.
- 5.1.9 Users must exercise good judgment when opening or forwarding any email or communications attachment from unknown or unexpected sources.
- 5.1.10 All visitors and employees to any Qualfon location must adhere to the following guidelines established regarding Physical Security:
  - a) Do not tailgate or allow anyone to enter into a Qualfon facility or secure area by following you.
  - b) Always use the access badge issued to you.
  - c) Your badge must always be visible and cannot be shared with anyone.
  - d) Restricted area doors must always remain closed.
  - e) All visitors must have an employee escort.
  - f) Be aware and sensitive to identify visitors in the workplace. If an unauthorized individual is observed on Qualfon's facilities, employees must immediately notify their supervisor, or direct the individual to the reception area or front desk.

### 5.2 Password – User Responsibilities.

- 5.2.1 Weak passwords, that have the following characteristics, must be avoided:
  - Fewer than eight characters.
  - Words found in a dictionary, of any language.
  - Common usage words, such as:
    - Names of family members, pets, friends, co-workers, and fantasy characters.
    - Computer terms and names, commands, sites, companies, hardware, and software.
    - The words “Qualfon”, “Dialog”, or any derivations.
    - Birthdays and other personal information, such as addresses and phone numbers.
    - Word or number patterns like “aaabbb”, “qwerty”, “zyxwvuts”, “123321”.
    - Any of the above, spelled backwards.
    - Any of the above, preceded or followed by a digit (such as “secret1” or “1secret”).

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5.2.2 Strong passwords, having the following characteristics, must always be used:

- a) Users should select strong passwords easy to remember but hard to guess.
- b) Use at least eight alphanumeric characters.
- c) Not a dictionary word, in any language, or slang, dialect, or jargon.
- d) Use both upper case (A – Z) and lower case (a – z) characters.
- e) Use not only letters, but also numerals (0 – 9), punctuation marks (!;?.,), and special characters (@#\$%^&\*() \_+|~-=\`{}[]").
- f) Must be free of consecutive identical, all-numeric or all-alphabetic characters.
- g) Not based on personal information, or the names of family members or pets.
- h) Passwords must never be written down or stored on-line, so create passwords that can be easily remembered. One way to do this is to create a password based on a song title, affirmation, or other phrase. For example, the phrase might be: "This May Be One Way To Remember" and the password could be: "TmB1w2R!" or "Tmb1W>r~" or some other variation. (Note: Do not use any of these examples as passwords!).

5.2.3 All Users must avoid writing passwords in plain text within emails or any other form of digital communication.

5.2.4 Passwords must be changed within the required timeframes or whenever there is any indication of its possible compromise.

5.2.5 Do not disclose a password to ANYONE.

5.2.6 If a User's password is forgotten, locked (regardless of the reason) or fails, it must be reported to their immediate Manager for escalation and follow-up.

### 5.3 Unacceptable Use.

5.3.1 Intentionally corrupting, misusing or stealing software or any other computing resource.

5.3.2 Accessing, transmitting, storing or processing Qualfon systems and confidential data that are not necessary for the performance of the employee's duties.

5.3.3 Making unauthorized changes to Qualfon computing resources, including installation of unapproved software.

5.3.4 Copying, using or distributing Qualfon owned software or business data for personal or other non-Qualfon use.

5.3.5 Unauthorized copying, using or distributing copyrighted material for which Qualfon or the end user does not have a valid/proper license.

5.3.6 Accessing information resources, equipment or facilities in violation of any control, policy or restriction on use.

5.3.7 Using Qualfon information resources for personal or private benefit, advantage or gain (financial or otherwise).

5.3.8 Using another User's computer account, login or access, with or without his or her permission.

5.3.9 Introducing malicious programs into the network or server (e.g., viruses, worms, Trojan horses, etc.).

5.3.10 Performing unauthorized security scanning, network monitoring or data interception.

5.3.11 Circumventing any Qualfon information security measures.

5.3.12 Sending unsolicited email messages (SPAM).

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5.3.13 Any form of harassment via email, telephone, SMS, IM or other communication method, whether through language, picture, image or graphic regardless of frequency or size of messages.

5.3.14 Posting or uploading Qualfon information to external news groups, bulletin boards or other public and social media forums (e.g., Facebook, or Twitter), or conducting any activity that could create the perception that communication was made in one's official capacity as a Qualfon employee, unless appropriate written approval has been obtained by the Qualfon's Media Impact Team or an authorized representative for public dissemination.

## “ACCEPTABLE USE POLICY”

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- 5.3.15 Using Qualfon office equipment or information resources for activities that are unlawful, inappropriate or offensive to fellow employees or the public.
- 5.3.16 Copying, moving or storing of any data including, but not limited to, confidential information, personally identifiable information, customer information or credit card information onto any unauthorized device, machine, storage or location.
- 5.3.17 Using any non-Qualfon managed email account or IM system (e.g., WhatsApp, Gmail, or Skype) or other resource to conduct Qualfon’s business.
- 5.3.18 Disclosing sensitive data of Qualfon or a Qualfon’s client, to unauthorized individuals, orally, in writing or by any other means, including but not limited to salary, trade & marketing secrets, confidential information or otherwise sensitive matters the User may have access to and its disclosure may harm Qualfon.

### 5.4 Company and Personal Mobile Devices (BYOD Policy).

- 5.4.1 Employees may only use systems authorized by Qualfon to access the company resources.
- 5.4.2 Employees can set up a Qualfon email account on a personal mobile device only if it has at least a 4-digit PIN code configured to lock the device.
- 5.4.3 Unacceptable Use – Mobile devices should comply with all of the above stated in section 5.3.
- 5.4.4 Security:
  - a) In order to prevent unauthorized access, devices must be password protected using the features of the device as per Qualfon’s password policy.
  - b) Devices provided by Qualfon for the job duties must all be encrypted to protect confidential information.
  - c) Smartphones and tablets belonging to employees that are for personal use only are not allowed to connect to the Qualfon network.
  - d) In the event that a device is lost or stolen the employee should contact Qualfon Service Desk immediately, so that the harm caused by any stolen data can be minimized as soon as possible. Failure to notify Qualfon at the first possible opportunity of a lost or stolen item is a violation of policy and may result in disciplinary action up to and including termination.
  - e) In the event of a suspected theft law enforcement should be notified.
  - f) In the event, a personal mobile device is lost or stolen the User is responsible for notifying their mobile carrier immediately upon loss of a device.
  - g) Upon termination Qualfon reserves the right to delete all company information from the device if stored locally.

### 5.5 Devices Allowed to Work@Home (W@H).

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- 5.5.1 Personal Laptops/ Desktops belonging to employees allowed to work@home should have limited personal use and comply with all of the above stated in this Policy, plus the following:
  - a) Must have Antivirus Software installed and updated. Before connecting to the Qualfon network, the device must be scanned.
  - b) Must be connected to the Qualfon VPN or Citrix using Multi Factor Authentication (MFA).
- 5.5.2 Company Laptops/Desktops allowed to work at home should comply with all of the above stated in this Policy, plus the following:
  - a) Equipment must be returned in the same condition in which it was received.
  - b) Prior to the Users last day of work the User must communicate to their immediate Manager as to which return option they have selected and complete the return within one week of the last day worked.
  - c) Actions taken to uninstall or deactivate any firewall and/or antivirus protection capabilities are strictly prohibited.



## “ACCEPTABLE USE POLICY”

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- d) Portable equipment should never be left unattended in any location at any time.
- e) Portable equipment should never be locked in the trunk of a car where the key is left with an attendant or valet.
- f) Portable equipment should never be checked as luggage.
- g) Users may be held financially responsible for the loss or damage to any equipment provided to them.

- 5.5.3 Equipment must be placed at a secured workspace to protect from shoulder surfing, access by any of the family members, visitors, etc.
- 5.5.4 The employee must continue to keep the workplace paperless and should not allow an external video camera or any other data capturing device in the vicinity of the work@home laptop/ desktop.
- 5.5.5 Employees must have signed a work@home agreement which provides in detail their responsibilities in maintaining compliance to all applicable policies while they operate from their home, including but not limited to: equipment requirements, environmental requirements, system requirements and audit processes.
- 5.5.6 In the event that a work@home employee has an issue or needs support, they shall inform their Supervisor or reach out to IT Support on the following page:
- All IT Support resources can be found on [support.qualfon.com](https://support.qualfon.com).

### 5.6 Clean Desk.

- 5.6.1 All operations areas must maintain, monitor and enforce rules prohibiting bags, packages, paper, writing instruments, tape recorders, cameras, mobile devices, or any other recording or electronic devices (e.g., cell phones, storage devices, etc.) on the operations floor.
- 5.6.2 Users must ensure that all sensitive information in hardcopy or electronic form is secure in their work area when they end their shift and/or when they leave their work area.
- 5.6.3 All office areas must be closed when not in use.
- 5.6.4 All approved storage devices (e.g., CDROM, DVD or USB flash drivers) must be labeled as sensitive and kept in a locked storage area when not in use.
- 5.6.5 It is forbidden to leave sensitive information written on sheets, post-its or whiteboards.
- 5.6.6 File cabinets containing sensitive information must be kept closed and locked when not in use or when not attended.
- 5.6.7 Printouts containing sensitive information must be immediately removed from the printer.
- 5.6.8 Sensitive documents must be shredded after use.

### 5.7 Clear Screen.

- 5.7.1 Unattended computers and mobile devices must be turned-off or protected with screen locking software controlled by a password, token or similar user authentication mechanism.
- 5.7.2 Confidential and Restricted information must not be left unattended on the User's screen.

### 5.8 Exceptions.

- 5.8.1 Exceptions requested by clients regarding usage of IT infrastructure, website restrictions, application restrictions and tools, must be defined in a documented exception agreement executed by Qualfon and client, and reviewed annually.

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## “ACCEPTABLE USE POLICY”

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## 6 Definitions.

**Firewall:** a method for keeping a network secure from intruders. It can be a single router that filters out unwanted packets or may comprise a combination of routers and servers each performing some type of firewall processing. Firewalls are widely used to give users secure access to the Internet as well as to separate a company's public Web server from its internal network.

**Information Resources:** information, electronic and computing devices, and network resources to conduct Qualfon's business or interact with internal networks and business systems, whether owned or leased by Qualfon or otherwise made available to Qualfon.

**Malware:** malware is software designed to infiltrate or damage a computer system without the owner's informed consent.

**Sensitive Data:** any data that is categorized as “Restricted” or “Confidential”, such as cardholder data, system design and configuration documents, backup media, etc.

**SPAM:** unsolicited and unauthorized email sent in large quantities.

## 7 References.

Code	Document	Area
-	-	-

## 8 Revision History and Authorizations.

Date	Rev. No.	Change	Author	Authorized
03/30/2018	1.0	New Policy development.	✓ Information Security & Compliance Manager.	✓ VP, Information Security.
03/25/2019	1.1	Added encryption directives for mobile devices (5.1.10 & 5.1.11)	✓ Information Security & Compliance Manager.	✓ VP, Information Security.
03/15/2020	2.0	Merged DD policies POL-0101 and POL-0039 into this policy (5.2 & 5.4).	✓ Governance & Compliance Team.	✓ VP, Information Security.
06/04/2021	2.1	Added Personal Devices Allowed to Work From Home section.	✓ Governance Team. ✓ Kate Crispignani. ✓ Ian Catolico. ✓ John Batchelor.	✓ VP, Information Security.

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