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SINCE 2009



# CULTURE HANDBOOK

WORKING TOWARDS A SUSTAINABLE, INCLUSIVE,  
SAFE & RESPONSIBLE WORKPLACE

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**Welcome to Freeloader Inc. Comm. Pvt. Ltd. Culture Handbook.**

**This document outlines our commitment to integrity, transparency, and legal compliance in all aspects of our business. It serves as a guide for our company's culture, ensuring that we uphold the highest standards of work environment for all internal and external partners.**

**CONTENTS:**

- Corporate Social Responsibility
- Anti-Discrimination Policy
- Company Ethics Policy
- ABC Policy
- Operations Quality Policy



## **CORPORATE SOCIAL RESPONSIBILITY**

### **Policy brief & purpose**

Our Corporate Social Responsibility (CSR) company policy refers to our responsibility toward our environment. Our company's existence is not lonely. It's part of a bigger system of people, values, other organizations and nature. The social responsibility of a business is to give back to the world just as it gives to us.

### **What is corporate social responsibility?**

Our Corporate Social Responsibility (CSR) company policy outlines our efforts to give back to the world as it gives to us.

### **Scope**

This policy applies to our company and its subsidiaries. It may also refer to suppliers and partners.

### **Policy elements**

We want to be a responsible business that meets the highest standards of ethics and professionalism.

Our company's social responsibility falls under two categories: **compliance** and **proactiveness**. Compliance refers to our company's commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect our natural environment.

### **Compliance**

#### ***Legality***

Our company will:

- Respect the law
- Honor its internal policies
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent



### ***Business ethics***

We'll always conduct business with integrity and respect to human rights. We'll promote:

- Safety and fair dealing
- Respect toward the consumer
- Anti-bribery and anti-corruption practices

### **Areas of Corporate Social Responsibility**

#### ***Protecting the environment***

Our company recognizes the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. We'll always follow best practices when disposing garbage and using chemical substances. Stewardship will also play an important role.

#### ***Protecting people***

We'll ensure that we:

- Don't risk the health and safety of our employees and community.
- Avoid harming the lives of local and indigenous people.
- Support diversity and inclusion.

#### ***Human rights***

Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labor practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labor).

### **Proactiveness**

#### ***Donations and aid***

Our company may preserve a budget to make monetary donations. These donations will aim to:

- Advance the arts, education and community events.
- Alleviate those in need.



### ***Volunteering***

Our company will encourage its employees to volunteer. They can volunteer through programs organized internally or externally. Our company may sponsor volunteering events from other organizations.

### ***Preserving the environment***

Apart from legal obligations, our company will proactively protect the environment. Examples of relevant activities include:

- Recycling
- Conserving energy
- Organizing reforestation excursions
- Using environmentally-friendly technologies

### ***Supporting the community***

Our company may initiate and support community investment and educational programs. For example, it may begin partnerships with vendors for producing clothes for the needy. It can provide support to nonprofit organizations or movements to promote cultural and economic development of national and local communities.



## **ANTI-DISCRIMINATION POLICY**

### **Purpose**

The purpose of this Legal Corporate Anti-Discrimination Policy is to establish a framework that promotes equity, respect, and inclusivity within the workplace. It unequivocally prohibits any form of discrimination based on protected characteristics under federal, state, or city laws, including but not limited to race, color, religion, age, nationality, gender, sexual orientation, disability, or genetic information.

### **Scope**

This policy applies comprehensively to all individuals associated with Freeloader Inc. Comm. Pvt. Ltd., including employees, contractors, and third parties. It encompasses all facets of employment, from recruitment and compensation negotiations to training, promotion, benefits, and termination. Additionally, it extends to interactions with clients, customers, and other affiliated third parties.

### **Non-Discrimination**

All members of Freeloader Inc. Comm. Pvt. Ltd. are expected to uphold an environment characterized by respect, equality, and dignity for all individuals. Discrimination in any form, whether overt or subtle, is strictly prohibited and will be met with swift and appropriate corrective action.

#### ***A. Prohibition of Discrimination***

The policy unequivocally prohibits discrimination based on any protected characteristic, including but not limited to race, color, religion, age, nationality, gender, sexual orientation, disability, or genetic information. Discriminatory acts may include harassment, exclusion, disparate treatment, or retaliation against individuals who assert their rights under this policy.

#### ***B. Prevention of Discrimination***

Freeloader Inc. Comm. Pvt. Ltd. is committed to preventing discrimination by fostering a culture of diversity, equity, and inclusion. Efforts will be made to proactively identify and address potential sources of discrimination through education, training, and the promotion of inclusive practices.



## Procedure for Addressing Discrimination

- A. **Reporting Discrimination:** Individuals who believe they have been subjected to or have witnessed discrimination are encouraged to promptly report the matter to their supervisor or the Human Resources Department of Freeloader Inc. Comm. Pvt. Ltd. All reports will be treated with the utmost confidentiality and sensitivity.
- B. **Investigation and Enforcement:** Upon receipt of a discrimination complaint, Freeloader Inc. Comm. Pvt. Ltd. will initiate a thorough and impartial investigation. The investigation process will involve gathering relevant evidence, interviewing witnesses, and assessing the credibility of the allegations. Employees found to have violated this policy will be subject to disciplinary action, ranging from counseling and training to suspension or termination of employment, depending on the severity and frequency of the offense.

## Training

Freeloader Inc. Comm. Pvt. Ltd. is committed to providing ongoing training and resources to cultivate a culture of diversity, equity, and inclusion. Training programs will be tailored to raise awareness, foster understanding, and promote respectful and inclusive behaviors among employees at all levels of the organization.

- A. **Diversity and Inclusion Training:** Employees will receive regular training on topics such as unconscious bias, cultural competency, and respectful communication. These training sessions will aim to increase awareness of diversity issues and provide practical strategies for promoting inclusivity in the workplace.
- B. **Leadership Training:** Managers and supervisors will receive specialized training to equip them with the skills and knowledge necessary to effectively address and prevent discrimination in their teams. This training will focus on promoting a culture of accountability, fostering open communication, and handling discrimination complaints with sensitivity and fairness.



## **Policy Review**

This policy will undergo regular review and assessment to ensure its continued alignment with evolving legal requirements and best practices in anti-discrimination efforts. Reviews will be conducted biennially or more frequently as necessary to address changes in legislation or societal norms.





## **COMPANY ETHICS POLICY**

At FICPL we believe that ethical conduct is fundamental to our success and reputation. This Company Ethics Policy serves as a compass guiding our actions and decisions, ensuring that we uphold the highest standards of integrity, transparency, and accountability in all our business dealings.

### **Core Values and Principles**

Our core values are the foundation of our corporate culture and define who we are as a company:

- **Integrity:** We are committed to acting honestly and ethically in everything we do, maintaining the trust and confidence of our stakeholders.
- **Respect:** We value the dignity, diversity, and contributions of every individual, fostering a culture of mutual respect and inclusion.
- **Compliance:** We abide by all applicable laws, regulations, and industry standards, conducting our business with the utmost legal and regulatory compliance.
- **Responsibility:** We recognize our responsibility to society and the environment, striving to make positive contributions to the communities in which we operate.

### **Compliance with Laws and Regulations**

We are dedicated to strict adherence to all laws, regulations, and standards governing our business activities. It is incumbent upon each employee to familiarize themselves with the relevant legal requirements pertaining to their roles and responsibilities and to conduct themselves accordingly.

### **Conflicts of Interest**

We recognize that conflicts of interest may arise in the course of conducting business. Employees must be vigilant in identifying and disclosing any actual or potential conflicts of interest, and take appropriate steps to manage them in accordance with company policies and procedures.



## **Anti-Corruption and Bribery**

We have zero tolerance for corruption, bribery, and other unethical practices. Employees must never offer, solicit, or accept bribes, kickbacks, or other improper inducements. Any suspicions of bribery or corruption must be reported immediately for thorough investigation.

## **Protection of Company Assets**

Our company's assets, including intellectual property, proprietary information, and physical resources, are vital to our success and must be protected diligently. Employees are responsible for safeguarding these assets and using them only for legitimate business purposes.

## **Fair Competition**

We are committed to fair and open competition in the marketplace, promoting innovation, choice, and consumer welfare. We strictly prohibit anti-competitive behaviors such as collusion, price-fixing, and abuse of market power, and expect all employees to comply with antitrust laws and regulations.

## **Respectful Workplace**

We foster a workplace culture based on mutual respect, dignity, and professionalism. Discrimination, harassment, and retaliation in any form are strictly prohibited. We are dedicated to providing a safe and inclusive work environment where every employee feels valued and empowered.

## **Environmental and Social Responsibility**

We recognize our duty to minimize our environmental footprint and contribute positively to society. We prioritize sustainability, responsible resource management, and social impact in our business decisions and operations, striving to be good stewards of the environment and active corporate citizens.

## **Reporting and Enforcement**

We encourage employees to speak up and report any violations of the Ethics Policy or suspected misconduct without fear of retaliation. Reports will be thoroughly investigated, and appropriate disciplinary action will be taken against violators, up to and including



termination of employment. We are committed to transparency and accountability in our enforcement efforts.

## **Training and Communication**

We provide comprehensive ethics training to all employees to ensure a clear understanding of our Ethics Policy and their obligations under it. Regular communication and reinforcement of our ethical values and expectations are essential to maintaining a culture of integrity and compliance throughout the organization.

## **Review and Updates**

We undertake regular reviews of our Ethics Policy to ensure its continued relevance and effectiveness in guiding our behavior and decision-making. Updates may be made as needed to reflect changes in laws, regulations, industry standards, or best practices.

## **Acknowledgment and Compliance**

By acknowledging receipt and understanding of this Ethics Policy, employees affirm their commitment to upholding its principles and standards in all their interactions and activities on behalf of FICPL.



## **ANTI-BRIBERY AND CORRUPTION POLICY**

FICPL is committed to conducting business with integrity and in compliance with all applicable laws and regulations. As part of this commitment, we have established this Anti-Bribery and Corruption Policy to outline our stance against bribery and corruption in any form, whether involving public officials or individuals in the private sector.

### **Purpose**

The purpose of this policy is to:

- Clearly communicate FICPL's zero-tolerance stance towards bribery and corruption.
- Provide guidance to employees, contractors, agents, and business partners on recognizing and avoiding situations that could lead to bribery or corruption.
- Establish procedures for reporting suspected instances of bribery or corruption.

### **Scope**

This policy applies to all employees, contractors, agents, and business partners of FICPL, regardless of their position or location. It covers all activities carried out on behalf of FICPL including interactions with government officials, clients, suppliers, and other third parties.

### **Policy Statements**

- A. Zero-Tolerance Policy:** FICPL maintains a strict zero-tolerance policy towards bribery and corruption in any form, whether involving public officials or individuals in the private sector. This policy applies to all employees, contractors, agents, and business partners, irrespective of their position or location within the organization. Any violation of this policy will result in disciplinary action, up to and including termination of employment or contract, and may also lead to legal action.
- B. Compliance with Laws and Regulations:** All individuals associated with FICPL must adhere to the highest ethical standards and comply with all applicable anti-bribery and corruption laws and regulations. This includes, but is not limited to, Prevention of Corruption Act, 1988 (PCA), the Indian Bribery Act, and any other relevant legislation in the jurisdictions where FICPL operates. Failure to comply with these laws and regulations may result in severe penalties for both individuals and the company.



- C. *Gifts, Hospitality, and Entertainment:*** While FICPL recognizes that the exchange of gifts, hospitality, and entertainment can be customary in business relationships, it is crucial to ensure that such exchanges do not compromise integrity or create conflicts of interest. Gifts, hospitality, and entertainment must be of modest value, given and received openly and transparently, and must not influence business decisions in any way. Employees should exercise caution and good judgment when giving or receiving such gestures to avoid any perception of impropriety.
- D. *Due Diligence on Third Parties:*** Before engaging with third parties, including agents, consultants, suppliers, and business partners, FICPL will conduct thorough due diligence to assess the risk of bribery and corruption associated with these relationships. This due diligence process will include background checks, financial assessments, and evaluations of the third party's anti-bribery and corruption controls. Contracts with third parties must include robust anti-bribery and corruption clauses, and third parties must be made aware of and agree to comply with FICPL's Anti-Bribery and Corruption Policy.
- E. *Reporting Suspected Violations:*** FICPL encourages a culture of transparency and accountability, where employees, contractors, agents, and business partners feel comfortable reporting any suspected violations of this policy. Reports of suspected violations can be made through FICPL's designated reporting channels, which may include anonymous reporting mechanisms. All reports will be taken seriously, and FICPL is committed to protecting whistleblowers from retaliation. Investigations into reported violations will be conducted promptly and impartially, and appropriate disciplinary action will be taken against individuals found to have breached this policy.
- F. *Training and Awareness:*** To ensure understanding and compliance with this policy, FICPL will provide regular training and awareness programs to all employees, contractors, agents, and business partners. These training sessions will cover topics such as recognizing and preventing bribery and corruption, understanding relevant laws and regulations, and reporting mechanisms for suspected violations. Additionally, FICPL will periodically review and update its training materials to reflect changes in laws, regulations, or best practices related to anti-bribery and corruption.

## Responsibilities

It is the responsibility of all employees, contractors, agents, and business partners to familiarize themselves with the provisions of this policy and to comply with its requirements. Managers and supervisors have a particular responsibility to ensure that their teams understand and adhere to this policy and to provide support and guidance as needed.



Compliance with this policy is a condition of employment and contractual agreements with FICPL.

## **Review and Revision**

This Anti-Bribery and Corruption Policy will be reviewed periodically by FICPL compliance team to ensure that it remains effective and relevant. Any necessary revisions to this policy will be made in consultation with relevant stakeholders and approved by FICPL's appropriate governing body. Employees, contractors, agents, and business partners will be notified of any updates to this policy, and training will be provided as needed to ensure understanding and compliance.

## **Compliance Monitoring**

FICPL's compliance team will monitor adherence to this policy through various means, including audits, assessments, and investigations of reported violations. Any instances of non-compliance will be addressed promptly and may result in disciplinary action, legal consequences, or termination of contracts. FICPL is committed to maintaining a culture of integrity and ethical conduct, and compliance with this policy is essential to upholding these values.

## **Conclusion**

The Anti-Bribery and Corruption Policy is a fundamental component of FICPL's commitment to conducting business with integrity, transparency, and in full compliance with the law. By adhering to the principles outlined in this policy, we can safeguard our reputation, protect our stakeholders, and contribute to a fair and ethical business environment. Every individual associated with FICPL plays a crucial role in upholding these principles, and together, we can ensure that our business practices remain beyond reproach.



## **OPERATIONS QUALITY POLICY**

As an integral part of our operations, FICPL is committed to maintaining the highest standards of quality across all aspects of our business activities. Our Operations Quality Policy serves as a guiding principle, outlining our commitment to excellence, customer satisfaction, compliance, and continuous improvement.

### **Purpose of the Quality Policy**

The purpose of our policy is to ensure that every member of our organization understands and adheres to our quality standards, thereby contributing to the delivery of products and services that consistently meet or exceed customer expectations. This policy serves as a foundation for establishing and maintaining a culture of quality excellence within FICPL.

### **Commitment to Quality**

At FICPL, we are dedicated to providing products and services of the highest quality. We strive to meet and exceed customer requirements and expectations by adhering to stringent quality control measures at every stage of our operations. Quality is ingrained in our company culture, and we are committed to continually improving our processes to deliver superior outcomes.

### **Customer Focus**

Our customers are at the heart of everything we do. We are committed to understanding their needs, preferences, and expectations to deliver products and services that consistently meet or exceed their requirements. By prioritizing customer satisfaction and actively seeking feedback, we aim to build lasting relationships and earn their trust and loyalty.

### **Compliance with Standards and Regulations**

We adhere to all relevant industry standards, regulations, and legal requirements applicable to our products and services. Compliance is non-negotiable, and we are committed to upholding the highest ethical and legal standards in all our business activities. Our adherence to regulations ensures the safety, reliability, and integrity of our offerings.



## Continuous Improvement

Continuous improvement is ingrained in the fabric of FICPL, driving our quest for excellence in all aspects of our operations. We recognize that achieving and maintaining high standards requires a proactive approach to identifying opportunities for enhancement and implementing effective solutions. To facilitate continuous improvement, we embrace the following practices:

- **Performance Monitoring and Analysis:** We regularly monitor key performance indicators (KPIs) across various departments and processes to assess performance and identify areas for improvement. Through data-driven analysis, we gain insights into trends, patterns, and opportunities for optimization.
- **Cross-Functional Collaboration:** We encourage collaboration and idea-sharing across teams and departments to leverage diverse perspectives and expertise. By fostering a culture of collaboration, we harness collective intelligence to tackle complex challenges and drive innovation.
- **Employee Engagement and Empowerment:** We empower our employees to contribute to continuous improvement initiatives by soliciting their feedback, ideas, and suggestions. We provide avenues for employee participation in improvement projects, recognizing their role as key stakeholders in driving organizational excellence.
- **Root Cause Analysis:** When addressing issues or setbacks, we prioritize root cause analysis to identify underlying factors contributing to problems. By understanding the root causes of issues, we can implement targeted solutions that address fundamental issues and prevent recurrence.
- **Process Optimization:** We regularly review and optimize our processes to streamline workflows, eliminate inefficiencies, and enhance productivity. Through process mapping, reengineering, and automation, we seek to optimize resource utilization and enhance the overall efficiency of our operations.
- **Continuous Learning and Development:** We invest in ongoing training and development initiatives to equip our employees with the knowledge, skills, and tools needed to excel in their roles. By fostering a learning culture, we enable continuous growth and improvement at both individual and organizational levels.
- **Feedback Mechanisms:** We value feedback from customers, employees, and stakeholders as a valuable source of insights for improvement. We actively seek feedback through





surveys, reviews, and communication channels, using this information to drive iterative improvements in our products, services, and processes.

- **Benchmarking and Best Practices:** We benchmark our performance against industry standards and best practices to identify areas where we can learn from top performers and adopt proven strategies. By staying abreast of industry trends and benchmarks, we position ourselves to remain competitive and agile in a rapidly evolving landscape.

## Responsibilities

The success of our quality management efforts relies on the commitment and accountability of all employees across FICPL. Each individual has a role to play in upholding the principles of our quality policy and contributing to continuous improvement. Key responsibilities include:

- **Senior Leadership:** Senior leaders set the tone for quality excellence by establishing a culture of quality, defining quality objectives, and providing resources and support for quality initiatives. They are responsible for championing the quality policy, fostering a quality-focused mindset, and ensuring that quality remains a strategic priority throughout the organization.
- **Managers and Supervisors:** Managers and supervisors play a pivotal role in translating the quality policy into actionable plans and objectives for their teams. They are responsible for cascading the quality policy down to their respective departments, providing guidance and resources to support quality improvement efforts, and monitoring the implementation of quality initiatives within their areas of responsibility.
- **Quality Assurance and Compliance Teams:** The quality assurance and compliance teams are tasked with ensuring adherence to quality standards, regulations, and best practices. They are responsible for conducting audits, inspections, and assessments to identify areas for improvement, monitoring compliance with quality requirements, and providing guidance on quality-related matters to employees across the organization.
- **Employees:** Every employee within FICPL has a responsibility to uphold the principles of the quality policy in their day-to-day activities. This includes following established quality procedures, adhering to quality standards and regulations relevant to their roles, actively participating in quality improvement initiatives, and reporting any quality-related issues or concerns to their supervisors or the appropriate quality assurance personnel.



- **Cross-Functional Teams:** Cross-functional teams are often formed to address specific quality-related challenges, implement quality improvement projects, or resolve quality issues. These teams bring together individuals from different departments or areas of expertise to collaborate on identifying root causes, developing solutions, and implementing corrective actions to enhance quality performance.
- **Training and Development Specialists:** Training and development specialists are responsible for designing and delivering training programs that equip employees with the knowledge, skills, and tools necessary to meet quality standards and objectives. They ensure that employees receive adequate training on quality-related topics, procedures, and technologies to support continuous improvement efforts.

## Review and Update Process

This policy is subject to regular review and update to ensure its relevance, effectiveness, and alignment with organizational goals and industry best practices. Feedback from stakeholders, changes in regulations, and emerging trends are considered during the review process to maintain the policy's currency and effectiveness. The table below outlines the review and update process for our quality policy.



## **AMENDMENTS**

Freeloader Inc. Comm. Pvt. Ltd. reserves the right to amend this handbook at any time to reflect advancements in legal standards or changes in societal attitudes towards various policies. Notice of amendments will be communicated to all relevant parties, and efforts will be made to ensure understanding and compliance with the updated policy provisions.

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