



FED-HUB

SOFTWARE SOLUTIONS

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Fed-Hub

1. CODE OF CONDUCT Overview

Our Code of Conduct is guided by our purpose to amplify human potential and create the next opportunity for people, businesses and communities. It sets forth our core values, shared responsibilities, global commitments, and promises. It provides general guidance about the Company's expectations, highlights situations that may require particular attention, and references additional resources and channels of communication available to us. It is also the first step for you to get clarity on any questions relating to ethical conduct. Our Code, however, cannot possibly address every situation we face at work. Therefore, the Code is by no means a substitute for our good judgment, upon which Fed-Hub depends. We must remember that each of us is responsible for our own actions and that the ethical choice is always the best choice. Please review the entire Code and refer to it whenever you have a question on ethical conduct. If requested to, you shall confirm in writing that you have reviewed the Code, and understand and agree to adhere to our core values, shared responsibilities, global commitments, and promises.

2. VALUES

CLIENT VALUE

To surpass client expectations consistently.

LEADERSHIP BY EXAMPLE

To act on our conviction that ordinary people can be inspired and mentored to do extraordinary things.

FAIRNESS

To be objective, empathetic and caring in our transaction.

INTEGRITY & TRANSPARENCY

To be ethical, sincere and open in all our transactions.

EXCELLENCE

To strive relentlessly, constantly learn, improve ourselves, our teams, and services to become the best

What does it mean to act with integrity and transparency?

Acting with integrity and transparency means that we should be ethical, sincere and open in all our transactions. Personal accountability goes a long way in showing our clients and our employees that they can rely on us. That is why, as employees and leaders of Fed-Hub, we keep our commitments and walk the talk. We speak up when we are uncomfortable or uncertain, especially when it comes to actions, conditions and behaviours that contradict our values and culture.

What does it mean to create client value?

Client value is a commitment to bring in ideas and recommendations that are in the client's best interests, thus discharging our professional responsibilities in a manner that leads to long-term partnerships. This means we should:

- Always consider our customers' perspective. The art of creating value starts with the ability to see our business through our client's eyes.
- Consistently work to improve customer satisfaction. Soliciting honest feedback through surveys on a regular basis allows us to keep our finger on the pulse of our customers' needs.
- Develop a memorable customer experience. Go the extra mile. Businesses with unforgettable customer experiences are more likely to benefit from word-of-mouth referrals and higher retention rates.

What does it mean to lead by example?

At Fed-Hub, we strive to act on our conviction that ordinary people can be inspired and mentored to do extraordinary things.

This means we should:

- Act with fairness and honesty in all our dealings—be objective and transaction oriented.
- Make sure that those whom we supervise and those to whom we report understand and follow the Code, Company policies and applicable laws.
- Know what resources are available to help.
- Support employees who, in good faith, ask questions, raise concerns, or cooperate with investigations.
- Raise any integrity concerns immediately. Problems caused by violations of the Code, Company policies or applicable laws seldom get better with the passage of time—they frequently get worse.

What does it mean to be fair?

Fairness in the workplace is about respecting the rights of all those who work with us. This means we should:

- Treat employees fairly, keeping differing skills, abilities and circumstances in mind.
- As a manager, make our expectations and evaluation criteria known.
- At every stage, give employees an equal chance to be heard—whether it is allowing them to share great ideas or to air grievances.
- Discourage politicking. Establish a reputation for discouraging this practice and encouraging team members to communicate openly with each other to solve issues.
- Give credit generously. Employees should be recognized for their ideas and contributions.

What does it mean to be excellent?

‘Excellence’ can be defined as the quality of excelling, possessing good qualities in high degree. It is about developing a winning mindset that says, “I want to be great at what I do. I want my work and my personal life to be successful.”

3. THE CODE IS MORE THAN JUST WORDS ON A PAGE—IT’S A WAY OF LIFE

The Code of Conduct expresses Fed-Hub’ commitment to conducting business ethically. It explains what it means to act with integrity and transparency in everything we do and in accordance with our unique culture and values. As members of the Fed-Hub family, let us follow not only the letter of the Code, but its intent and spirit as well. This means we should:

- Understand the areas covered by the Code, Company policies and procedures, and laws that apply to our job.
- Follow the legal requirements of all locations where we do business.
- Conduct ourselves in ways that are consistent with the Code, Company policies and procedures, and laws.
- Speak up if we have concerns or suspect violations of the Code, Company policies and procedures, or laws.
- When requested, certify that we have reviewed, understand and agree to follow the Code.
- Understand that following the Code is a mandatory part of our job. The Code cannot address every situation that may occur. We are expected to exercise good judgment and ask questions when we need guidance or clarification. Many resources are available to assist us. These include our managers, the Office of Integrity and Compliance, Human Resources, Legal Department, the Helpline, and other resources listed at the end of the Code. In addition to the Code, we should also be aware of all Company policies and procedures applicable to our work. You may refer to the Policy Portal which is a repository of all our policies.

3.1 WHAT ARE MY RESPONSIBILITIES?

I FOLLOW THE CODE

Our Code applies equally to all Fed-Hub directors, officers and employees globally, across our subsidiaries. The Code also applies to our partners, suppliers, agents or others acting on the Company's behalf. As employees, it is important that we know and follow the Code as a guideline for decision-making that is paired with integrity.

I LEAD BY EXAMPLE

No matter what our role is, each one of us is expected to lead when it is a question of ethics and be accountable for our actions. We act with responsibility and integrity in tune with our values.

I AM THE EXAMPLE FOR MY TEAM

Most often, a manager is the first person to be contacted about a concern in our work environment. Managers have some specific responsibilities:

- Be a role model of ethical behaviour.
- Encourage your team to raise issues and speak up.
- Communicate a positive message about your commitment to ethics and compliance.
- Promote our values, the Code of Conduct and compliance with policies and the law.
- Actively support ethics and compliance awareness and training programs.
- Have open avenues for communication.
- Listen and respond fairly to employee concerns.
- Find satisfactory and complete resolutions to ethical issues.
- Escalate concerns when additional assistance is needed.

Fed-Hub' non-retaliation policy is an embodiment of our values and a cornerstone of our Code. If you observe violations of Fed-Hub values and principles, you are encouraged to report such incidents to the Helpline. Fed-Hub will protect you and ensure that you are not retaliated against because of any report that you raise in good faith. Fed-Hub does not tolerate any form of retaliation (whether by a manager, co-worker or otherwise) against an individual because he or she made a good faith report of an integrity concern. This protection also extends to anyone who assists with or cooperates in an investigation or report of an integrity concern or question. We support those who support our values.

A

RESPECTING EACH OTHER

To put these values in practice, all of us must ensure that decisions affecting employees are based on business factors only. For instance, decisions regarding hiring, promotion, termination, transfer, leave of absence or compensation should only be based on relevant business factors. We must also ensure that we never verbally or physically mistreat others or engage in offensive behaviour, and we should not tolerate those who do. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence and any other conduct that interferes with a co-worker's ability to do his or her job. NEXT The Company's Anti-Discrimination and Anti-Harassment Policy applies to all persons involved in the operations of the Company and prohibits harassment by any employee of the Company towards other employees as well as outside vendors and customers. If you have any questions relating to what constitutes discrimination or harassment, or any other questions or concerns pertaining to discrimination or harassment, please refer to the Policy on Prevention and Redressal of Harassment at Fed-Hub or any of the location-specific procedures found on your local policy page on the Company intranet. If you wish to report a concern, you may reach out to us using any of the relevant channels noted in the "Speak Up" section on the previous page, or simply call the Helpline listed throughout this Code of Conduct.

A Safe Place to Work

To work effectively, all of us need a healthy and safe work environment. All forms of substance abuse as well as the use or distribution of drugs and alcohol while at work is prohibited. Unless required as part of your role (for instance for security personnel where deemed necessary), possession and/or use of weapons/firearms or ammunition while on business of the Company is prohibited. All of us should be safe at our place of work. Should you observe any unsafe situations at work, please reach out to the Helpline. Please also take the time to familiarize yourselves with emergency procedures and the safety manuals applicable to your location.

B ETHICS IN OUR BUSINESS ACTIVITIES

Fed-Hub enjoys a hard-won reputation for honesty, integrity and fair dealing. Without question, this reputation for integrity is an invaluable part of our success. There are certain regulations that Fed-Hub is subject to and we should ensure that we comply both in letter and in spirit with these as is applicable.

Preventing Corruption

Corporate bribery is fundamentally destructive of this basic tenet.” Corruption diverts public resources from priorities such as health, education, and infrastructure and impedes economic growth. Corruption undermines public accountability and the rule of law. Corruption is anti-competitive, increases costs of doing business globally and introduces significant uncertainty into business. Bribery thus raises the risks of doing business, putting a company’s bottom line and reputation in jeopardy. Companies that pay bribes to win business ultimately undermine their own long-term interests and the best interests of their investors. As a global company, apart from the Prevention of Corruption Act, 1988 (India), Fed-Hub is subject to all relevant anti-corruption laws.

Government Officials

Particular care must be taken when interacting with government officials. Government Official includes officer or employee of any agency, department or instrument of any government or anyone acting on their behalf. This includes (but is not limited to) officer or employees of a political party, employees or members of military services, civil services or judicial systems, candidates for political or public office, members of a ruling or royal families and employees of businesses controlled by the government, public international organizations etc. Family members of Government Officials are also considered as Government officials.

Prevention Corruption

We should never offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official or commercial partners including customers or their representatives to: ▪ Obtain or retain business; ▪ Influence business decisions; or ▪ Secure an unfair advantage This includes bribes, kickbacks and facilitation payments.

Anything of value? What does that mean?

Cash payments, gifts, entertainment, excessive business promotional activities, covering or reimbursing expenses, investment opportunities, shares, securities, loans or contractual rights, promise of future employment, payments under consulting agreements, subcontracts, stock options, and similar items of value.

RESPONSE

If the holiday gift baskets are of low value and you receive them infrequently, it is unlikely that you would feel obligated or influenced by them. If that is the case, you can continue to accept them. However, you are encouraged to share the gift baskets with other employees in your department. For more information on permissible value, please refer to Anti-Bribery and Anti-Corruption Policy.

Gifts and Entertainment

When we offer a gift to a customer, a government official or any third party, we should keep the following in mind:

- It is not done to obtain or retain business, influence business decision or gain an improper advantage in business.
- It is lawful under the laws of the country where the gift is being given and permitted under the policies of the client.
- It constitutes a bona fide promotion or goodwill expenditure.
- It is not in the form of cash.
- The gift is of nominal value (on an individual and aggregate basis).
- The gift is accurately recorded in the Company's books and records.
- You must comply with our Anti-Bribery and Anti-Corruption Policy.

Charitable Contributions

Before making a charitable contribution on behalf of Fed-Hub, we should keep in mind the following:

- The recipient is a registered, tax-paying, recognized organization.
- The contributions are permissible under applicable local laws.
- Contributions are made without demand or expectation of business return.
- Beneficiaries of such contributions should not be related to the directors or executive officers of Fed-Hub.
- Contributions shall not be made in cash or to the private account of an individual.
- Any amounts contributed or donations made towards charitable causes shall be fairly and accurately reflected in Fed-Hub's books of accounts.
- Contribution shall be in compliance with Anti-Bribery and Anti-Corruption Policy.

Conflict of Interest

What does conflict of interest mean?

When the interests or benefits of one person conflict with the interests or benefits of the Company, a conflict of interest is said to occur. We must avoid situations involving actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised.

Conflicts of interest also occur when we or our family members receive improper personal benefits, or preferential treatment as a result of our position, or the position of a family member, in the Company. Remember that such situations might impact our judgment or responsibilities towards our Company and our shareholders and customers.

When could I be faced with a 'conflict of interest' issue?

Some examples include:

OUTSIDE EMPLOYMENT If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment with any other company or business entity, it is considered outside employment and a conflict of interest. This includes performing services as an employee, agent or contractor for a customer, supplier or any other entity that has a business relationship with the Company while working at Fed-Hub

WORKING WITH FAMILY AND FRIENDS To avoid conflicts of interest and any appearance of favouritism, ensure that you do not work directly for, supervise or make employment decisions about a Family Member or Relative. This includes positions or assignments within the same department and the employment of such individuals in positions that have a financial or other dependence or influence (e.g., an auditing or control relationship, or a supervisor/subordinate relationship).

OUTSIDE DIRECTORSHIPS It is a conflict of interest for employees or directors to serve as a director, partner, sole proprietor or any other equivalent position of any company, firm or business entity, as the case may be that competes with the Company or have a line of business similar to that of Fed-Hub. With prior approval of the Office of Integrity and Compliance, employees may serve on the boards or governing body of two other business entities, provided such entities do not compete with Fed-Hub. In case any clarification is required, please reach out to the Office of Integrity and Compliance.

RELATED PARTY TRANSACTIONS You should also avoid conducting Company business with a Family Member or Relative, or with a business in which a Family Member or Relative is associated in any significant role. Family Member or Relative include spouse, siblings, children, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws. Material transactions, particularly those involving the Company's directors or executive officers, must be reviewed and approved in writing in advance by the Company's Audit Committee. As a listed entity, the Company is subject to certain legal obligations to report such material related party transactions to regulators and it is

important that all such transactions be fully disclosed, conducted at arm's length and with no preferential treatment.

RELATIONSHIPS AT WORK Personal or romantic involvement with a competitor, supplier, or another employee of the Company might affect your ability to exercise good judgment on behalf of the Company. This could lead to conflict of interest. Personal relationships and romantic liaisons between employees who are in a manager-employee reporting structure may lead to team management challenges and reduced morale. Such relationships must be disclosed to the manager immediately, who may take appropriate corrective action.

OUTSIDE INVESTMENTS You should not have a financial interest, including through a relative, in any organization if that interest would give or appear to give you a conflict of interest with the Company. You should be particularly sensitive to financial interests in competitors, suppliers, customers, distributors and strategic partners.

LOANS and guarantees to employees by the Company could constitute improper personal benefits depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of obligations of, any director or executive officer or their family members are prohibited by law.

Company Confidential Information

Unless the Company has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, we are prohibited from disclosing confidential Company information. Confidential or proprietary information about clients, our organization, or other parties, which has been gained through employment or affiliation with Fed-Hub, may not be used for personal advantage or for the benefit of third parties. Our Information Security Policy sets out the expectations on each of us to safeguard confidential information of Fed-Hub and our third parties with the assurance of security, availability, integrity and confidentiality. The Acceptable Usage Policy provides the purposes for which Fed-Hub IT resources may be legitimately used and highlights our cyber responsibilities which include keeping systems safe from inappropriate/unauthorized access and other cybersecurity breaches. These policies, together provide employees with the mandatory directive of safeguarding Fed-Hub and client information. Our Fed-Hub Privacy Policy sets out the expectations on each of us to process personal information belonging to our employees, clients, agents, consultants, suppliers, and contractors in a manner so as to ensure compliance with all applicable privacy laws and regulations, including processing through cross border data transfer between group entities. Unless authorized and contractually agreed, we are committed to protect the confidentiality of such personal information while processing such personal information, implement adequate technical and organizational measures and employees are made aware of and required to comply with mandated processes under Privacy Policy for responsible use, disclosure, storage, retaining or any other processing of such personal information. Any incident involving personal data/information (actual or suspected) should be brought to the attention of Data Privacy Office by raising an AHD to DPO or via email at privacy@Fed-Hub.com.

Any incident involving unauthorized access/ use of systems or information held therein (actual or suspected) should be reported to HR Team or via email at privacy@fedhubsoftware.com



PROTECTING COMPANY ASSETS

COMPANY CONFIDENTIAL INFORMATION

For the Company, its confidential information is a valuable asset and every director, employee and agent of the Company must protect it. Confidential information includes all non-public information. It also includes personal information (regardless of its source) that we obtain in the course of business. We must take care that all confidential information is used for Company business purposes only and in case of personal information, in addition, it must be processed on instructions from the Company in accordance with laid out policies, procedures and guidelines and as per applicable privacy laws and regulations. Upon joining Fed-Hub, all employees sign a Confidentiality and Nondisclosure Agreement which details their confidentiality obligations to the Company. As employees, we have access to significant amounts of company information that may not be available to the public, and we should preserve the confidentiality of information obtained in the Company's service. Information of a confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

PHYSICAL ACCESS CONTROL

Fed-Hub has developed procedures covering physical access control to ensure privacy of communications, maintenance of the security of the Company communication equipment, and safeguard Company assets from theft, misuse and destruction. We are responsible for complying with the security policies in your location. You must not defeat or cause to defeat the purpose for which the access control was implemented. For more details, please read the Company's Information Security Policy.

USE OF COMPANY ASSETS

The use of Fed-Hub assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited. Our information technology, intellectual property (e.g., copyrights, patents, and trademarks), facilities, equipment, machines, software, and cash may be used for business purposes only, including responsible and accurate expense reimbursement, and in accordance with applicable policies.

D

COMMITTED TO OUR CUSTOMERS AND OUR SUPPLIERS

FAIR DEALINGS

We must deal fairly with the Company's customers, suppliers, partners, service providers, competitors and anyone else with whom we interact while at work. We should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

CONFIDENTIAL INFORMATION OF CLIENTS AND THIRD PARTIES

The Confidentiality and Nondisclosure Agreement we sign when we join the Company details our confidentiality obligations to the Company and its clients. We have access to significant amounts of client information that may not be available to the public, and we are required to preserve the confidentiality of information obtained in client service. Information of a confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

Unless the client has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to process or disclose, we are prohibited from processing or disclosing confidential client information. Confidential Information of Clients and Third Parties Confidential or proprietary information including personal information about clients, our organization, or other parties, which has been gained through employment or affiliation with Fed-Hub, may not be used for personal advantage or for the benefit of third parties. We are committed to protect the confidentiality of processing such personal information by implementing adequate technical and organizational measures, and all employees, agents, consultants, suppliers, contractors, are made aware of their responsibility to use, or process personal information, unless authorized by law and/or contractually agreed.

What do we need to know? What is regulated? How do we comply?

- Anti-trust laws generally address the following areas: Unfair pricing practices (such as price discrimination, price fixing), secret rebates, entry barriers through exclusive dealerships or distributorships which are questionable, restrictions on carrying competing products and other practices. If you come across any such questionable practices in the course of your work, for instance, while bidding for services, please contact the Support Team.

- You should not engage in any commercially motivated understanding (written or oral, expressed or implied) to undermine the fair market competition.
- You should not knowingly make false or misleading statements regarding our competitors or the products and services of our competitors, customers or suppliers.
- Collusion among competitors is illegal. Our communications with competitors should always avoid subjects such as prices or other terms and conditions of sale, customers and suppliers. You should not enter into an agreement or understanding, written or oral, express or implied, with any competitor on these subjects.

GOVERNMENTAL RELATIONS

While all our clients are treated with respect, we should be especially careful while dealing with government clients. There are significant penalties in many countries, including debarment and monetary penalties for organizations that fail to follow the law while working for government clients. The principles set out in Section B of this Code of Conduct ‘Ethics in Our Business Activities’ and Anti-Bribery and Anti-Corruption Policy of the Company must be strictly followed by all who interact with government officials especially with respect to gifts and entertainment. We should not attempt to influence government employees in any manner other than what is agreed in our contractual arrangement with the government. Employment opportunities for former government officials must not be discussed without first seeking guidance and approval of the Office of Integrity and Compliance. Similarly, we should not initiate discussions for any contract with any business in which a government official or employee holds a significant interest, without the prior approval of the Office of Integrity and Compliance. Reach out to support@fedhubsoftware.com

SELECTING SUPPLIERS

The Company’s suppliers make significant contributions to our success. We strive to create an environment where our suppliers are confident that they will be treated with respect. We select our significant suppliers or enter into significant supplier agreements through a competitive bid process where possible. For more information, read our Supplier Code of Conduct attached below.



SUPPLIER CODE OF
CONDUCT.pdf