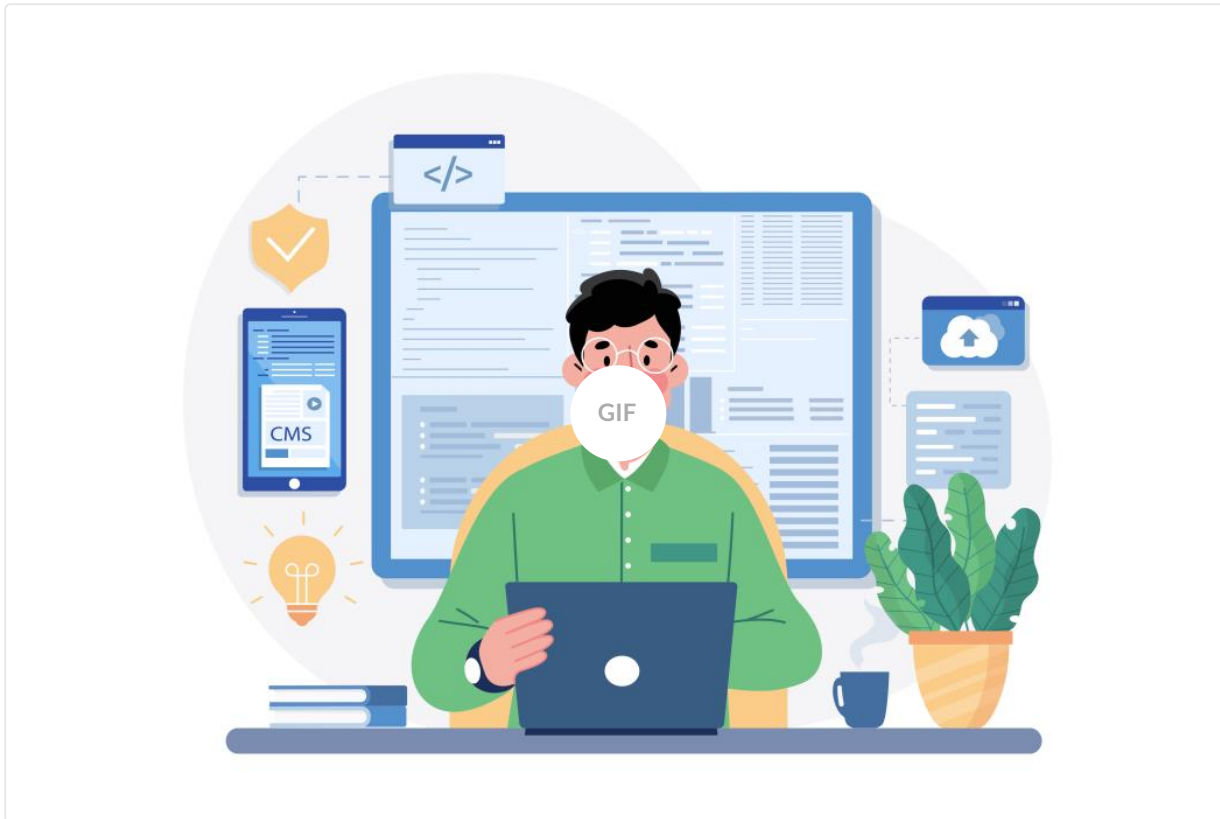


# Code of Conduct

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Code of conduct is defined as the principles, values, standards, or rules of behavior that guide the decisions, procedures and systems of an organization in a way that contributes to the welfare of its key stakeholders, and respects the rights of all constituents affected by its operations. All and members of Aspire must follow the Code of Conduct defined in this manual. Appropriate disciplinary actions shall be taken in case of non-compliance of the Code. The HR director will ensure that every employee is given access to copy of the Code of Conduct at the time of joining.

## 1. Scope of Code of Conduct

This code of conduct is applicable on all parties doing business for Aspire as full-time employees, part-time employees, consultants and third party consultants.

## 2. Compliance with Laws, Rules and Regulations

Aspire and its and members are bound by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees shall

adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to Aspire and may go beyond what is required by the law.

Senior Management will ensure that:

- All employees are aware of this Code:
- No employee will be asked to do anything that would breach this Code.
- Queries and / or concerns arising under this Code may be addressed to the HR department.

### 3. Aspire Core Values

- **Quality:** Aspire values Quality as all-encompassing passion and pursuit.
- **Commitment:** Build and Orient all processes towards the 'purpose' and deliverable to the user.
- **Cost effectiveness:** Build and Orient all processes to Delivering the best cost advantage and Return on Investment for the client.
- **Timeliness:** Deliver On-time Every time; Understand time costs substantially more in lost opportunity.
- **Focus:** Comprehend the purpose; Conform to the process; Commit to the delivery.
- **Improvement:** Perfection is a journey; Every moment is a learning opportunity- to do better; to be better.
- **Collaboration:** Together we build; Together we deliver; Together we grow.
- **Delivery:** Delivery is the tangible value created - for the client and for Aspire.

### 4. Conflict of Interest

A conflict of interest is a set of circumstances that creates a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest. Each employee shall be free of any personal interest that could influence his or her judgment or action in the conduct of services or affect his or her responsibility in managing the affairs of Aspire. An employee must not only avoid situations that give rise or could give rise to a conflict of interest, but also situations that create the appearance of a Conflict of Interest.

Following policies shall be applicable to all employees of Aspire regarding conflict of interest.

- Employee must be alert to any situation that could compromise the position of trust the employee holds at Aspire, and avoid any kind of conflict between

personal interests and those of Aspire.

- Employee may not engage in activities that can cause conflict of interests of Aspire, interfere with the responsibilities of employees, or damage or misuse the reputation, relationships, confidential information or other property of Aspire.
- From time to time, situations shall arise that are not clear-cut. If employees are uncertain about the propriety of conduct/ business relationships, the employee must consult his supervisor or the Head of HR department for guidance.
- Employees must ensure that their personal interests do not conflict with the duties which are owed to Aspire or which Aspire owes to its stake holders and clients.

This includes engaging in any of the following activities without the prior written approval of the management.

- Becoming personally involved in any transaction of Aspire.
- Negotiating or contracting on behalf of Aspire with an entity, supplier or a client in which the employee or a relative has an interest.
- Accepting any employment (whether part time, temporary or other), consultancy, directorship or partnership outside Aspire.

## **5. Families and Relatives**

- Hiring and career development decisions will be fair and objective. Immediate family members and partners of employees may be hired as employees or consultants only if the appointment is based on qualifications, performance, skills and experience and provided that there is no direct or indirect reporting relationship between the employee and his or her relative or partner.
- In the case of HR and administration roles, no referrals from other departments are accepted as this might highly put confidential information at risk.
- In case of a relative, any member of selection committee may be barred to be a part of selection process. These principles of fair employment will apply to all aspects of the employment, including compensation, promotions and transfers, as well as in case that the relationship develops after the respective employee has joined the Authority.

## **6. Equal Opportunity**

Aspire will ensure that its employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors. Aspire will not tolerate unlawful discrimination relating to employment. Hiring, evaluation,

promotion, training, development, discipline, compensation and termination decisions shall be based on qualifications and merit only. Aspire does not discriminate on the basis of race, colour, religion, age, gender, marital status, disability and / or ethnic origin.

## **7. Bribery and Corruption**

Bribery occurs when someone offers, pays, seeks or accepts a payment, gift or favour to influence an official outcome improperly. Bribery and corruption can be direct or indirect through third parties. Employees of Aspire:

- Must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage.
- Must follow the anti-bribery and corruption laws that Aspire is subject to.
- Will be liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if found involved in bribery and corruption.
- Inform the management of Aspire, if they suspect or know of corruption in Aspire.

## **8. Confidential**

All employees must sign an NDA to agree not to disseminate, reveal or otherwise make available to others, or use for its own purposes, any information of a proprietary or confidential nature owned by Aspire and learned by the employee and member in the course of fulfilling his/her obligations and performing the Services, including, without limitation, business plans and proposals, projections, financial, sales and marketing information, marketing plans and studies, proposed and actual pricing information, anticipated products or services, specifications, flow charts, databases, computer programs, drawings, schematics, knowhow, models, mock-ups, customer lists, customer addresses, health information relating to any person and any other personal or proprietary customer data or information, products and services provided to specific customers, sales volumes, employee/ contractor information, equipment specifications, locations and use, network configurations, current or prospective relationship with vendors and independent contractors (including, without limitation, information regarding the types of products and services contracted for and the cost of such products and services to Aspire), any information concerning any publication, product, technology, procedure or service under development by Aspire, and any information or materials that have been designated orally or in writing as confidential or proprietary (collectively, "Confidential Information").

All employees and members must also agree that Confidential Information includes information that is not specifically encompassed in the definition above, but that, due to legends, the nature of such information, or the circumstances of its disclosure, is reasonably understood to be confidential by the employee/ member. The employee/ member further agrees that Confidential Information also includes information with respect to any Client of Aspire and its subsidiaries and affiliates and all copies, summaries and extracts of any Confidential Information.

Upon completion or termination of the Services, an employee shall immediately return to

Aspire all Aspire property and Confidential Information which is in tangible form (including, but not limited to, all correspondence, memoranda, files, manuals, books, lists, records, equipment, computer disks, magnetic tape, and electronic and other media and equipment) and all copies thereof in The Undersigned's possession, custody or control.

It is prohibited at any case for employees and members at Aspire who have access to confidential information including clients details, to compete with Aspire. Or further participate in a business that competes with Aspire, or to work for any institution or company or an entity that has the same nature of work. Moreover, it is prohibited to compete with Aspire by any means or methods, whether during employment with Aspire or after three years from the resignation or termination date for any reason whatsoever, whether the termination was by Aspire or by the employee him/herself.

## **9. Fraud, Protection of Authority's Assets, Accounting**

Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets or the Employees shall safeguard and make proper and efficient use of Aspire's property. All employees shall seek to protect Aspire's property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems. To the extent permitted under applicable law, the Authority reserves the right to monitor and inspect how its assets are used by employees, including terminals, please refer to the IT policy for more details.

## **10. Gifts, Meals, Entertainment**

It is the policy of Aspire that gifts are not to be accepted from any person, an employee organization, client, supplier or business associate related to Aspire.

Employees of Aspire shall ensure that they shall not accept any gifts offered to them and/or they shall not demand or request any gifts from any stake holder of Aspire. Exception to this policy is in cases where refusal of a gift would be regarded as an affront or it would be impractical or impossible to return the gift then in certain cases it can be accepted, noting that this shall be reported and provided the gift is:

- Not in the form of cash,
- Not in return for any consideration or in the anticipation of the same.
- The value of gift is not material.

Any departure or proposed departure from the above must be reported through the HR Director to the Managing Director for a ruling on acceptance. Appropriate disciplinary actions shall be taken in case of negligence in complying with the above policy.

## **11. Discrimination and Harassment**

Aspire respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age, political loyalty or engage in any kind of verbal or physical harassment based on any of the above or any other reason. Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the HR Department. Employees should be particularly sensitive to actions or behaviours that may be acceptable in one culture but not in another. They should treat others with respect and avoid situations that may be perceived as inappropriate. Harassment can result in disciplinary action and may lead to dismissal.

## **12. Sexual Harassment**

Sexual harassment includes abuse of a sexual nature including, but not limited to, commentaries on the victim's body, suggestive objects and pictures in the work place, degrading words used to describe the victim, or proposition of a sexual nature. Sexual harassment also includes the threat or insinuation that lack of sexual submission will adversely affect the victim's employment, wages, advancement, assigned duties or shifts, academic standing or other conditions that affect the victim's "livelihood". In case any employee feels that he/she is victim of sexual harassment, they should report the event to the HR Director. Anonymity of complaints shall be ensured to

ensure safety of complainant. The Managing Director and Head of HR shall ensure appropriate disciplinary action is carried out against such complaints.

### **13. Political Activities**

No employee shall use their position or power at Aspire to contribute of any value to any of the political candidates or This includes using Aspire facilities, equipment, personnel etc. for the purpose. In case of an employee considering assuming any public office, specific information with all related reasons must be provided to HR department for approval.

### **14. Anti-Smoking Policy**

To protect and enhance our indoor air quality and to contribute to the health and well-being of all employees, Aspire shall be entirely smoke free. Additionally, the use of all tobacco products, including Vape, is banned from Aspire workplace. Smoking is prohibited in all of the enclosed areas within Aspire worksites, without exception. This includes common work areas, conference and meeting rooms, elevators, private offices, hallways, the lunchrooms, restrooms, employer owned or leased vehicles, and all other enclosed facilities.

Additionally, the following shall be followed when smoking:

- Employees may smoke in their personal vehicles and in the allocated smoking area that have ashtrays.
- Stairs must be used instead of the elevator for refreshment breaks / trips while going downstairs.
- Employees are urged to use only ashtrays for disposing cigarette butts. Employees shall not throw them on the floor or extinguish them on the walls. More ashtrays can be requested if needed.
- Employees shall not rest their feet on the walls while smoking/ standing around their smoking friends during lunch break.
- Employees shall not use the cars in the basement area to rest the mugs and burning cigarette.
- Team members are urged to bring back to the kitchen any reusable coffee cups taken along with them during their refreshment breaks.

### **15. Policy**

No	Violation Type	1 <sup>st</sup> time Disciplinary Action	2 <sup>nd</sup> time Disciplinary Action	3 <sup>rd</sup> time Disciplinary Action	4 <sup>th</sup> time Disciplinary Action	5 <sup>th</sup> Time Disciplinary Action
1	Sexual harassment in all its forms, including physical or verbal abuse, whether direct or indirect, or through telephone calls or text messages via mobile phone or others	Separation				
2	Wearing improper clothing to work/ inappropriate appearance. To this end, the following cloths are considered inappropriate; short pants, short skirts, sheer blouses, sleeveless shirts, revealing shirts, sports suits, swim	Written Warning	1 working day pay	Written Warning		



	suits, sandals and open shoes. Other cloths against norms are considered inappropriate for the work place.					
3	Racial, ethnic, religious or sexual discrimination	Written Warning	Written Warning			
4	Disclosure of the amount of the monthly salary that the employee receives from the company	Written Warning	1 work day pay	Written Warning		
5	Using the Internet to access chat sites and improper sites	Written Warning	Written Warning			
6	Being in a place other than the place designated for work ,or leaving the work office without obtaining the prior approval from the	Written Notice	4 working hours pay	1 working day pay	2 working days pay	Written Warning

	responsible manager					
7	Deliberate sleep during working hours	1 working day pay	2 working days pay	Written Warning	Written Warning	
8	Bringing alcoholic beverages or prohibited substances into the workplace	Written Warning	Written Warning			
9	Carrying weapons of all kinds in workplaces for unauthorized persons	Written Warning	Written Warning			
10	Smoking in places other than those designated for it	Written Notice	4 working hours pay	1 working day pay	2 working days pay	Written Warning
11	Smoking in workplaces that is declared dangerous	Written Notice	1 working day pay	Written Warning	Written Warning	
12	Negligence in carrying out job duties	Written Notice	1 working day pay	2 working days pay	Written Warning	Written Warning
13	Misuse of tools and equipment	Written Warning	Written Warning			

	intentionally or negligently					
14	False claim of illness	Written Notice	1 working day pay	2 working days pay	Written Warning	Written Warning
15	Driving vehicles and moving machinery at a speed exceeding the permissible speed	1 working day pay	2 working days pay	Written Warning	Written Warning	
16	Non-compliance with hygiene instructions, whether personal or in the workplace	Written Notice	1 working day pay	2 working days pay	3 working days pay	Written Warning
17	Accepting gifts or gratuities without permission from the management	Written Notice	3 working days pay	Written Warning	Written Warning	
18	Inappropriate communication with work colleagues	Written Warning	Written Warning			
19	Delay in carrying out	Written Notice	Written Warning	Written Warning		

	tasks and duties					
20	Collecting cash or in-kind donations without permission	Written Notice	Written Warning	Written Warning		
21	Accepting or giving money or taking a bribe and doing any act contrary to the company and the laws and regulations in force	Written Warning	Written Warning			

## 16. Investigation Committee

The company may form an investigation committee consisting of three members, in case a complaint is lodged by one of its employees or its clients. This committee will consider and investigate the complaint, to arrive at an amicable solution for the complainant and make recommendations for improving the working conditions.