

**AventIQ, a trademark of Mittal Software Labs Limited**

**Code of Conduct and Ethics Policy**

**Confidential and Restricted**

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**Objective**

This Code of Conduct and Ethics Policy establishes the principles of professional behaviour, ethical practices, and integrity expected of all employees, contractors, interns, and associates of AventIQ, a trademark of Mittal Software Labs Limited. This policy is designed to ensure compliance with Indian laws, including the Delhi Shops and Establishments Act, 1954, and other applicable regulations.

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**Scope and Applicability**

This policy applies to:

- All employees (permanent, probationary, and contractual).
- Interns (paid and unpaid).
- Consultants and third-party associates engaged with AventIQ.

This Code is applicable at all AventIQ offices, remote work environments, client locations, and during work-related travel or events.

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**Core Principles**

**1. Integrity:**

- Conduct business honestly and ethically.
- Avoid conflicts of interest and disclose any potential conflicts to management.

**2. Professionalism:**

- Treat colleagues, clients, and stakeholders with respect, fairness, and dignity.
- Adhere to high standards of professionalism in communication, appearance, and behaviour.

**3. Confidentiality:**

- Protect company, client, and employee data.
- Do not disclose sensitive information without proper authorization.

#### **4. Compliance with Laws:**

- Abide by all applicable Indian laws, including employment, anti-corruption, and data protection regulations.
- Ensure compliance with client-specific legal requirements, where applicable.

#### **5. Workplace Ethics:**

- Promote a safe, inclusive, and harassment-free workplace.
  - Avoid discriminatory practices based on race, gender, caste, religion, or disability.
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### **Employee Conduct**

#### **General Expectations:**

1. Adhere to the working hours and leave policies outlined by the Company.
2. Ensure punctuality and regular attendance.
3. Refrain from using company resources for personal or illegal purposes.

#### **Conflict of Interest:**

1. Avoid personal relationships, financial interests, or external activities that may compromise professional judgment or objectivity.
2. Inform HR or management of any potential conflicts of interest immediately.

#### **Gifts and Benefits:**

1. Do not accept gifts, favours, or benefits that may influence or appear to influence business decisions.
  2. Any gift or benefit exceeding INR 5,000 must be reported to the HR department.
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### **Ethical Practices**

#### **Anti-Bribery and Anti-Corruption:**

1. Do not offer, accept, or solicit bribes in any form.
2. Report any observed or suspected instances of corruption to the designated compliance officer.

#### **Fair Competition:**

1. Avoid unfair trade practices and comply with all applicable competition laws.
2. Refrain from engaging in activities that may harm the reputation of competitors.

#### **Environmental Responsibility:**

1. Minimize waste and adhere to the Company's sustainability initiatives.
  2. Ensure compliance with environmental laws and policies.
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### **Use of Company Resources**

1. **Technology Usage:**
    - Use company-provided technology (e.g., laptops, emails) solely for work purposes.
    - Do not install unauthorized software or access inappropriate content on company devices.
  2. **Intellectual Property:**
    - Protect company intellectual property, including trademarks, patents, and proprietary information.
    - Do not share company intellectual property with external parties without prior authorization.
  3. **Expense Reimbursements:**
    - Submit accurate and truthful expense claims.
    - Falsification of expenses will lead to disciplinary action.
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### **Workplace Conduct**

#### **Harassment and Discrimination:**

1. Zero tolerance for sexual harassment, bullying, or discrimination.
2. Grievances related to harassment must be reported as per the POSH Policy or Grievance Redressal Policy.

#### **Substance Abuse:**

1. The use of alcohol, drugs, or other controlled substances on company premises or during work hours is prohibited.
2. Employees under the influence of such substances may face disciplinary action.

## **Health and Safety:**

1. Follow all health and safety protocols outlined by the Company.
  2. Report unsafe conditions or workplace incidents to the designated safety officer.
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## **Reporting Violations**

1. Employees must report any known or suspected violations of this Code to their manager or HR.
  2. Reports may also be made anonymously via the designated compliance hotline or email.
  3. Retaliation against individuals who report violations in good faith is strictly prohibited.
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## **Non-Compliance and Disciplinary Action**

1. Non-compliance with this policy may result in:
    - o Verbal or written warnings.
    - o Suspension or termination of employment.
    - o Legal action for severe violations.
  2. The nature of disciplinary action will depend on the severity and circumstances of the violation.
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## **Policy Review and Amendments**

This policy will be reviewed annually and updated to reflect changes in legal and organizational requirements. Employees will be notified of any significant amendments.

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**Approved By: Nikhil Mittal**

**Effective Date: 01-Jan-2025**

**Last Updated: 26-Dec-2024**