

# COMPLIANCE POLICY

**Business Function: Human Resources**

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**Company's Confidential: Immigration Policy. V-1.0**

**Disclaimer:** This policy has to be adhered as a standard practice by the employees. This policy does not create an express or implied contract between SSIT and any of its employees located in India or any other designated locations where this policy is applicable. This policy may be modified at the discretion of the Company HR at any time, with or without notice of the employee. Nothing contained in this policy is intended to alter employees 'At – Will' employment relationship with the Company. SSIT reserves the right to terminate any employee at any time, with or without notice or procedure, for any reason deemed by the Company to be in the best interests of the Company when the policy is violated.

**PURPOSE**

The Design, Operation, Use & Management of Information Systems which must comply with all relevant statutory, regulatory and contractual security requirements and Internal Processes introduced.

**SCOPE**

This Policy is applicable to all Business Functions of Sigmasoft Infotech Pvt Ltd.

**RESPONSIBILITY**

HR & Operations department is responsible for providing guidance and direction on compliance related issues. All business functions are responsible for following the laid guidelines, procedures and directions stated herein. Infrastructure department responsible for compliance to Software copyright.

**GENERAL**

All applicable statutes and regulations will be explicitly listed out and contractual requirements will be defined and documented for information systems. The specific controls, counter measures and individual responsibilities to meet these requirements should be similarly defined and documented. Legislative requirements vary from country to country. Advice on specific legal requirements should be sought from SIGMASOFT India legal adviser(s).

**IDENTIFICATION OF APPLICABLE LEGISLATION**

All applicable and relevant statutes and regulations for all the information system processing facilities will be listed out and contractual requirements will be defined and documented. Compliance to Relevant statutory, regulatory and contractual requirements will be reviewed on an annual basis or as and when relevant changes takes place therein. Refer “Applicable Legislation Worksheet”.

**INTELLECTUAL PROPERTY RIGHTS(IPR)****Copyright**

Legislative, regulatory and contractual requirements may place restrictions on the copying of proprietary material. In particular, they may require that only material that is developed by SIGMASOFT, or that is licensed or provided by the developer to SIGMASOFT, can be used. Controls will be enforced to prevent violation of the Indian Copyright Act 1957

**Software Copyright**

The management will enforce the following controls:

- Publish software copyright compliance policy defining the legal usage of the software.
- Follow standard procedures for acquisition of software products.

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- Develop awareness among the staff for using only legal copies of software. Disciplinary action will be taken against all the users breaching these policies.
- Maintain asset register and licenses of the software products.
- Monitor the usage of licenses and implementing controls to ensure that maximum number of users permitted is not exceeded.
- Carry out regular checks to ensure that only authorized software and licensed products are installed.

In-house developed software will display the ownership of such software.

### **SAFEGUARDING OF COMPANY RECORDS**

Important records will be protected from loss or destruction. Many of these records may be required for the statutory and regulatory requirements. Records will be maintained for all applicable statutory, regulatory and contractual requirements for information systems. Retention period for all records and documents is 8 years as prescribed by Income Tax Act, 1961.

Records will be destructed in a safe and secure manner on completion of their retention period.

### **DATA PROTECTION AND PRIVACY OF PERSONAL INFORMATION**

All employees are required to comply with SIGMASOFT India's Information Security Policies. Though there is no Data Protection Act in India applicable to SIGMASOFT India, based on client specific requirements, data protection controls will be implemented.

### **COLLECTION OF EVIDENCE**

It is necessary to have adequate evidence to support an action against a person or organization. Whenever this action is an internal disciplinary matter standard SIGMASOFT internal disciplinary procedures are to be followed.

Appropriate measures will be taken while collecting the evidence relating to investigations involving information systems. Appropriate legal advice will be sought whenever necessary.

Where the action involves the law, whether it is civil or criminal, the evidence presented will conform to the rules for evidence. In general, these rules cover:

- Admissibility of evidence: Whether or not the evidence can be used in court. To achieve this SIGMASOFT India will ensure that information systems comply with any published standard or code of practice for the production of admissible evidence.
- Weight of evidence: The quality and completeness of the evidence. In case of paper documents the investigation will ensure that originals are kept securely and in case of information on computer media, a copy of media and log will be kept securely.

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- Adequate evidence that controls have operated correctly and consistently (i.e. process control evidence) throughout the period that the evidence to be recovered was stored and processed by the system.

**POLICY & PROCESSES ADHERENCE**

Every employee including management has to follow and adhere the set policies and processes which are defined and standardised keeping the development of company's business in view besides smooth flow of work or project delivery execution.

Any deviation will attract immediate disciplinary action. The processes will take certain upgradations periodically which will be informed to everyone in Sigmasoft so as to get updated simultaneously.

**Version Control History**

Version	Amendment	Date of Amendment
V1.0	Policy approved	26-Dec-2022

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