



Employee Code of Conduct

Strictly private & Confidential

Prepared by: Mr. C Gopi, HR

Approved by: Mr. T. Chandramohan, Managing Director

Policy brief & purpose

Our **Employee Code of Conduct policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

As an employee, you are responsible to behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgement. Reach out to HR/ Management if you face any issues or have any questions.

Scope

This policy applies to all our employees regardless of employment agreement or rank.

Policy elements

What are the components of an Employee Code of Conduct Policy?

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

(1) Respect in the workplace: All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

(2) Protection of Company Property: All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Should not misuse **company equipment** or use it frivolously.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.



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(3) Professionalism

All employees must show integrity and professionalism in the workplace: ***Please read and adhere basic workplace professionalism do's and don'ts provided to everyone.*** An employee should take self-initiate to develop Professionalism for oneself.

- **Corruption:** We discourage employees from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.
- **Job duties and authority:** All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

- **Absenteeism and tardiness:** Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But generally, we expect employees to be punctual when coming to and leaving from work.

(4) Confidentiality: Confidentiality of all information received from the client etc be respected and should never be used for personal gain. Any information given should be in a clear & honest way that is not deliberately misleading. Company information on strategic plans, business models, investment decisions, database, etc should not be given to third parties. Confidential information received from clients on strategic plans, investment decisions, expansion plans, product pricing, etc should not be given to other clients.

(5) Collaboration: Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

(6) Communication: All employees must be open for communication with their colleagues, supervisors team members and management.

(7) Benefits: We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, or other benefits our company offers.

(8) Policies: All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department / Management.



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(9) Business Gifts: Employees must not solicit or accept from any person any remuneration, benefit, advantage or promise of further advantage whether for themselves, their immediate family, or any business concern or trust with which they are associated. Business gifts, other than items of a very small intrinsic value (not more than the cost of a normal business lunch) such as diaries, pens, calendars, etc should not be accepted. Any gifts should be able to be used at the normal place of work of the employee concerned and should contain the name/logo of the company providing the gift.

(10) Hospitality: An employee should not allow him or herself to be influenced or be perceived by others to be influenced as the result of hospitality. The frequency and scale of hospitality should be managed openly and with care. The value of any hospitality should not be greater than the employee's company can reciprocate.

(11) Dress code: Our company's official dress code is *Business/ Business Casual/ Smart Casual/ Casual*. However, an employee's position may also inform how they should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. We expect you to be clean when coming to work and avoid wearing clothes that are unprofessional (e.g. workout clothes.)

As long as you conform with our guidelines above, we don't have specific expectations about what types of clothes or accessories you should wear.

We also respect and permit grooming styles, clothing and accessories that are dictated by religious beliefs, ethnicity or disability. Please refer to dress code policy for more details.

(12) Cyber security and digital devices: This deals with all things digital at work. We want to set some guidelines for using computers, phones, our internet connection and social media to ensure security and protect our assets. Please read Internet usage policy & email usage policy for more details.

(13) Cell phone: We will not allow use of your personal cell phones at work. But we also want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a mobile locker facility wherein you can keep your cell phone in the individual locker drawer to safeguard it with an individual key provided to you. You may use your cell phone only on break times out of the work area.

(14) Corporate email: Email is essential to our work. You should use your company email primarily for work only. Please refer to the email usage policy for more details.

(15) Social media: We want to provide practical advice to prevent careless use of social media by the employees. We address two types of social media uses: using personal social media and representing our company through social media. Please read Social Media Policy for more details.

(16) Conflict of interest: We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. When you are experiencing a conflict of interest, your personal goals are no longer aligned with your responsibilities towards us. For



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example, owning stocks of one of our competitors is a conflict of interest. In other cases, you may be faced with an ethical issue. For example, accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behavior, you will lose your job and may face legal trouble.

For this reason, conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Follow our policies and always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your manager or HR and we will try to help you resolve it.

(17) Employee relationships: We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines and we ask you to always behave professionally.

Fraternization: Fraternization refers to dating or being friends with your colleagues. In this policy, "dating" equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual violence and we prohibit them explicitly.

Dating colleagues: If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of our workplace. You are also obliged to respect your colleagues who date each other. We won't tolerate sexual jokes, malicious gossip and improper comments. If you witness this kind of behavior, please report it to HR.

Dating managers: To avoid accusations of favoritism, abuse of authority and sexual harassment, supervisors must not date their direct reports. This restriction extends to every manager above an employee.

Friendships at work: Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But we expect you to focus on your work and keep personal disputes outside of our workplace.

(18) Employment of relatives: Everyone in our company should be hired, recognized or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest, so we will place some restrictions on hiring employees' relatives.

To our company, a "relative" is someone who is related by blood or marriage within the third degree to an employee. This includes: parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children and adopted children. As an employee, you can refer your relatives to work with our company. Here are our only restrictions:



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- *[You must not be involved in a supervisory/reporting relationship with a relative.]*
- *[You cannot be transferred, promoted or hired inside a reporting relationship with a relative.]*
- *[You cannot be part of a hiring committee, when your relative is interviewed for that position.]*

If you become related to a manager or direct report after you both become employed by our company, we may have to *[transfer one of you.]*

(19) Workplace visitors: If you want to invite a visitor to our offices, please ask for permission from our *[HR Manager/ Management]* first. Also, inform our *[reception/ gate/ front-office]* of your visitor's arrival. Visitors should sign in and show identification. They will receive passes and will be asked to return them to *[reception/ gate/ front-office]* once their visit is complete.

When you have office visitors, you also have responsibilities. You should:

- Always tend to your visitors (especially when they are underage.)
- Keep your visitors away from areas where there are dangerous machines, confidential records or sensitive equipment, computers / work area.
- Prevent your visitors from proselytizing your colleagues, gathering donations or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, *[front office employees/ security guards]* will notify you so you may collect it.

(20) Solicitation and distribution: Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

We do not allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- Seek support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- Ask colleagues to participate in employment-related activities.

In all cases, we ask that you do not disturb or distract colleagues from their work.



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(21) Transparency/Traceability: All salient points concerning a business decision must be recorded in a document that is kept on file as per company policy. In particular, this document should contain the technical and financial factors that influenced the choice, as well as the opinions and authorizations that preceded it, under the procedures in force at the time the decision was made.

(22) Decisions & Advice: When it is not easy to decide what is and is not acceptable, advice should be sought from HR/the management.

Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.