

CODE OF CONDUCT



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APPLICABILITY	All Full Time Employees and Contractual Employees Of Infiniti Research
EFFECTIVE DATE	March 01, 2015
VERSION	IR / BLR / 1.0
POLICY NUMBER	IR/BLR/CORPORATE GROUP/CG/007
AUTHOR	CORPORATE SUPPORT GROUP

OBJECTIVE:

The purpose of this Code is to promote high standards of conduct from all staff members at Infiniti Research.

APPLICABILITY:

- The Code applies to all staff members of Infiniti Research including contractual employees and interns.
- All employees should familiarize themselves with the contents of the Code, including the sources of advice and support available when in doubt about appropriate conduct, and the disciplinary actions that can be applied where the Code is breached.
- This code of conduct should be read in conjunction with the company's Disciplinary Procedures, the individual's contract of employment (or) appointment letter and the associated policy documents.

EQUAL EMPLOYMENT OPPORTUNITY

- We are committed to equal opportunity in employment and to fostering diversity in our work force.
- In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Infiniti Research will be based on merit, qualifications, and the needs of the company. The Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, gender, national origin, age, disability, ancestry, medical conditions, family status, sexual orientation, or any other basis prohibited by law.
- This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.
- Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their Group Managers or the Human Resources Department.
- Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

DRUG FREE WORKPLACE

- Infiniti Research is committed to maintaining a work environment that is free from the influence of illegal drugs or controlled substances.
- The objective of this standard is to provide a safe, healthy and productive work place for everyone, in order to prevent accidents and to comply with national and state health and safety regulations.
- While performing their job duties or while on company premises, Infiniti Research prohibits illicit use, possession, sale, conveyance, distribution or manufacture of illegal drugs or controlled substances in any amount or in any manner.
- Any violation of this policy will result in disciplinary action up to and including termination and referral for criminal prosecution.

LANGUAGE AND BEHAVIOUR

The objective of this standard is to prevent usage of inappropriate language (uncouth and offensive) at workplace and shall include:

- Slangs or body language indicating racial, ethnic, religious and gender-based insults
- Slangs or body language indicating any form of lewdness

Any violation of this policy will result in disciplinary action up to and including termination and referral for criminal prosecution.

HARRASSMENT (INCLUDING) SEXUAL HARRASSMENT

- Infiniti Research is a work place that is free from unlawful harassment. We expect that all employees will treat each other with fairness and respect.
- Harassment on the basis of race, color, national origin, disability, gender or as otherwise prohibited under applicable law, will not be tolerated and is strictly prohibited.
- Harassment includes, without limitation, verbal harassment, physical harassment, visual harassment and innuendo.
- Sexual Harassment includes unwelcome sexual advances, requests for sexual favors or other visual, verbal or physical conduct of a sexual nature.
- Reports of harassment, including sexual harassment are investigated promptly and thoroughly. Coercion, intimidation, retaliation, interference or discrimination for filing a complaint or assisting in an investigation is prohibited. The Grievance counsel team will investigate the case before taking any action
- Any violation of this policy will result in disciplinary action up to and including termination and referral for criminal prosecution

WORKPLACE VIOLENCE

- Employees should not possess weapons while on Company property or while acting in business capacity. By way of example weapons and accessories include but are not limited to firearms, ammunition, chemicals, explosives, and knives to name a few.

- Employees are also prohibited from engaging in acts or threats of violence while on company property or while acting in a business capacity. Acts or threats of violence include but are not limited to physical, verbal and non-verbal conduct intended to intimidate, harass or coerce any employee, business partner, client or vendor. Acts or threats of violence may also include destruction or threatened destruction of corporate or personal property, harassing or threatening phone calls, stalking, innuendo or threats of physical harm.
- Any violation of this policy will result in disciplinary action up to and including termination and referral for criminal prosecution.

BUSINESS ETHICS AND CONDUCT

- The successful business operation and reputation of our Company are built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and the letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.
- The continued success of our Company is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees owe it to the Company and its customers, to act in a way that will merit the continued trust and confidence of the public.
- The Company will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

- In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your Group Manager and, if necessary, with the Human Resources Department for advice and consultation.
- Compliance with this policy of business ethics and conduct is the responsibility of every employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

PERSONAL RELATIONSHIPS AT WORKPLACE

- Employees are encouraged to socialize and develop professional relationships in the workplace provided that these relationships do not interfere with the work performance of either individual or with the effective functioning of the workplace.
- The employment of relatives or individuals involved in a relationship in the same area of an organization may cause serious conflicts and problems with favoritism and employee morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried over into day-to-day working relationships.
- For purposes of this policy, the term “relationship” is defined as relatives (or) any persons who are related to each other by blood or by marriage including those in a personal relationship.

GUIDELINES:

- Relatives of current employees should not occupy a position that will be working directly for or supervising their relative.
- Individuals involved in a personal relationship with a current employee should also not occupy a position that will be working directly for or supervising the employee with whom they are involved
- If a relative relationship or a personal relationship is established after employment between employees (who are in a reporting situation as described above / otherwise), it is the responsibility and obligation of the concerned employees involved in the relationship to disclose the existence of the relationship to the HR Department.
- In cases where a conflict or the potential for conflict arises because of the relationship between employees, even if there is no line of authority or reporting involved, the employees may be separated by reassignment or will be provided thirty days to make a decision regarding a change.
- Employees in a relationship should ensure that, their relationship does not interfere with the work performance of either individual or with the effective functioning of the workplace.
- When relationships develop into situations that may be viewed as harassment or discrimination, employees should refer to the company's policies on Harassment and Equal Employment Opportunity.

GIFTS AND ENTERTAINMENT

From time to time, we receive or give gifts that are meant to show friendship, appreciation or thanks from or to people who do business with Infiniti Research. Employees should never accept or offer gifts or entertainment as doing so may improperly influence or appear to influence business decisions. If you are involved in any stage of a decision to do business with another company or person, you must refrain from accepting or giving any gift or entertainment that may influence or appear to influence the decision to do business.

Accepting Gifts

It is the policy of the company that no employee or any member of his/her immediate family will accept any form of gifts or favors from contractors, suppliers, clients/ customers or any other party having business dealings with the company.

However, in such circumstances where it is customary to do so, employees are permitted to accept such gifts of nominal value , such that the gift / favor is not accepted and/or extended for the purpose or with the intention of:

- Influencing any present or future act, decision at an individual (or) organizational level.
- Inducing such employee to perform or omit any act in violation of his/her duties or responsibilities.

For the purpose of this section, “Nominal Value” of a gift is defined as the sum of the gift(s) having an aggregate monetary value of not more INR 300/-.

Employees are required to report to their respective Business Head / HR Department, on all gifts / favors received which exceed the above defined nominal value.

Accepting Entertainment Invitations

Social interaction is an acceptable means of building and maintaining relationships. Functions such as business dinners, parties and meetings in a social context are appropriate if a significant purpose of the social event is business related and your participation is in the ordinary course of business, usual and customary and not so frequent as to suggest a business purpose is not valid.

Accepting invitations in such circumstances must be pre-approved by the Management of Infiniti Research. Please contact the HR Department before accepting entertainment invitations.

Governmental Authorities:

There are special rules that apply to dealing with National, State, Local and foreign governmental authorities. These are likely to be restrictive than the general guidance in these Standards, so you should contact the HR Department for legal guidance before considering any gifts to or entertainment of any governmental authorities.

Note:

Any employee in doubt as to the nature or purpose of the gift / favor / entertainment invitation are requested to contact the HR Department.

CONFLICT OF INTEREST

Board of Director Positions:

- There are serious responsibilities and obligations associated with becoming a member of any company's board of directors. These could include potential financial liability time and travel commitments. Therefore an employee of Infiniti Research should not accept an invitation to become a board member (including an advisory board member) of any company unless he/she has received written pre-approval from the Infiniti Research Management. If an employee is already serving as a board member in other companies, he/she should promptly seek written approval from the Management.
- In the event, an employee has obtained approval to sit on an outside board, he/she must refrain from participating in or influencing any relationship or transaction between Infiniti Research and the other company.
- In addition, if serving on an outside membership begins to interfere with the proper performance of an employee's job, or if the other company becomes a Partner/Competitor or otherwise changes in a way that an employee's continued service is no longer appropriate, he/she may be asked resign his/her board membership.

GENERAL

- All employees are required to engage oneself exclusively in the work assigned by Infiniti Research and shall not take up any independent or individual assignments (whether the same is part time or full time, in an advisory capacity or otherwise) directly or indirectly without the express written consent of your concerned department.
- Employees shall ensure that he/she shall not, directly or indirectly, engage in any activity or have any interest in, or perform any services for any person or entity with any individual or entity who is involved in activities, which are or shall be in conflict with the interests of Infiniti Research.
- In case of any conflict or doubt, the employee should discuss the matter with HR Department, understand the position of Infiniti Research and resolve the conflict.

QUERIES / ESCALATION MATRIX

For Queries on the policy

Login Infinian connect portal and raise a ticket under the HR Section

Escalation

hrindia@infinitiresearch.com|

DISCLAIMER

The company reserves the right to add / modify/ delete the contents / sections of the policy document. Any such change shall be communicated to the employee by way of an email announcement and shall be applicable to the employee during the course of his/her employment with Infiniti Research and thereafter (where applicable). Updated policy documents shall be uploaded online (replacing the previous version).