

Code of Conduct

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Our Code

Introducing Our Code of Conduct

Our Employee Code of Conduct has been created to help you understand our core values and the behaviours expected to support them. It provides guidance and support for every Minfy employee worldwide, with high standards of ethical behaviour and compliance with local laws and regulations being essential to protecting the reputation and long-term success of our business.

We must constantly live up to our values so our clients, partners, stakeholders and colleagues are confident they can put their full trust in us.

Your Commitment to the Code

The policy applies to all Employees of Minfy Technologies Pvt Ltd and its subsidiaries and affiliates. Every Minfy employee worldwide must comply with our Code. You must make time to read and understand this document. Non-compliance with this policy may result in disciplinary action, up to and including termination of employment, and legal consequences in accordance with applicable laws. This policy will be periodically reviewed and updated to ensure its effectiveness and compliance with changes in laws and regulations. If you are in any doubt about the meaning or applicability of a rule or regulation please seek advice from the HR team.

Living Up to Our Values

We take great pride in having established a culture that is built upon a unified set of cultural values. More than just words, we believe our values are the essence of our brand and are instrumental to the way we work and operate day in, day out.



Your Responsibilities

Everyone in our business has particular responsibilities, including:

- Leading by example
- Promoting and role-modelling good ethical behaviour and business conduct including complying with all laws and regulations.
- Ensuring you have access to and receive training on ethical issues and policies relating to this Code.
- Promoting an environment where your colleagues feel confident and able to raise ethical concerns and that they are taken seriously and followed-up

Zero Tolerance

While this Code gives you guidance for certain situations there are specific areas where we have a zero-tolerance policy:

- Unsafe, illegal or unethical working practices.
- Violence and aggression n Discrimination, bullying and harassment.
- Bribery and corruption.
- Retaliation against anyone who speaks up and does the right thing

Whistleblowing

What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing at work by an employee, the Company or a supplier or business partner. Our whistleblowing policy exists to help you speak up in situations where you suspect dangerous, illegal, harmful or fraudulent activity is taking place, or when you or your colleagues are being treated unfairly.

Minfy conducts its business to the highest standards of integrity and honesty, and we expect you to maintain these same standards in everything you do. The Organization is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees, and others that we deal with, who have serious concerns about any aspect of the Organization's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis. The policy document makes it clear that employees can do so without fear of victimisation, subsequent discrimination, or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise serious concerns within the Organization rather than overlooking a problem or 'blowing the whistle' outside.

To work out the right thing to do in any situation, ask yourself:

- Is it legal?
- Is it ethical?
- Does it comply with Minfy policy?
- Would I be happy telling my family or close friend about it?

If the answer to any of these is 'no' then we expect you to speak up. Who should I speak to? If you have an issue with a colleague or business partner, you should initially discuss the matter with them. If this is not possible, you should speak to your line manager or the HR manager. Minfy will conduct a fair investigation about the accusations being made. Minfy will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the employee. If the employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against the employee. If, however, allegation is made in bad faith or if the allegation is made for personal gain, then such an allegation will constitute a misconduct for which the disciplinary action may be initiated against the employee.

Our People

Work Place Safety

We work to ensure the workplace safety of our employees, partners and clients. We expect all our employees to play their part in making Minfy safer and ensuring the team has the right equipment, training and knowledge to guarantee a safe working environment

Look out for your own safety and others around you. Report any accident, near miss, injury, ill health or unsafe condition so appropriate action can be taken. Familiarise yourself with your building's fire extinguishers, fire exits and emergency evacuation procedures.

Quite simply, if it isn't safe, don't do it. Stop and inform your manager. If you have any health and safety concerns please speak to your line manager or the HR team.

Diversity, Equality & Inclusion

We promote a diverse, inclusive and equal workplace both internally and externally. Every employee is expected to treat everyone with whom we have contact with dignity, courtesy and respect. At Minfy we treat our colleagues, clients and business partners fairly and on merit. We hire, promote and reward our employees based on their capabilities and skills. Gender, race, colour, ethnic or national origins, marital status, family circumstances, age, disability, sexual orientation, political or religious belief are not relevant to personal and team performance at work.

Our employees have the right to work in a safe environment free from discrimination, bullying or harassment. We support and uphold human rights principles and international standards. We will not tolerate, engage in or support the use of, forced or child labour.

Harassment Free Work Place

Harassment is unwanted conduct which is reasonably considered to have the purpose or effect of Violating the recipient's dignity & Creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient.

Every Minfy employee has the right to a working environment free from harassment and intimidation. We are sensitive to cultural and social differences. However, our principles are universal and are reflected in the laws of every country in which we operate. We have a zero-tolerance approach to harassment and intimidation. At all times every employee has a personal responsibility to behave in a manner that is not offensive to others.

Drugs & Alcohol

Minfy is a drug & alcohol -free workplace. While at work and attending business-related activities in any location you are strictly prohibited from using or being under the influence of alcohol or illegal drugs. From time to time the Company may organise events where alcohol is served. You are always expected to drink responsibly at these events.

Our Business

Bribery & Corruption

Minfy operates a zero-tolerance policy to bribery and corruption. We do not offer or accept bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or for any individual. We actively refrain from any misleading or deceptive accounting or financial reporting practices. We expect you to comply with all bribery and corruption-related legislation and to take all reasonable steps to ensure everyone you work with does the same.

Gifts & Hospitality

Maintaining high quality professional relationships with our clients and partners is essential to the success of our business. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts, it is important to note that the value of any gifts exchanged should be kept below INR1000. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised.

Similarly, no employee shall offer gifts, benefits or hospitality to Govt. or other officials during periods when important decisions are to be made by them which will affect Minfy. In no instance should an employee receive or offer cash disregarding the value.

Conflicts of Interest

We avoid conflicts of interest. Always act in the best interest of Minfy. Don't let your personal interests' conflict – or appear to conflict – with the Company's interests. Even the perception of a conflict of interest can damage our business and reputation. This happens when your personal interests could affect your judgement and conflict with Minfy's interests. Conflicts of interest can arise in many situations. In certain circumstances, and at Minfy's discretion, it may be necessary to reassign someone to avoid a conflict of interest, or to take steps to maintain a harmonious and productive work environment. For example Interviewing, hiring or engaging a family member or close personal friend as an employee, consultant or business partner creates a conflict of interest. You must disclose any such relationship and remove yourself from the decision-making process.

Below are some more examples of conduct covered by this policy that could create potential conflict of interest:

- Employee shall not own a material interest in, or act as an officer, director, employee or consultant on behalf of any supplier, contractor or customer of the company.
- Employees shall not use information or Company facilities and assets in a manner that will be detrimental to the Company. An Employee shall not use for his/her own benefit information developed through Company's research or development activities or disclose confidential or unpublished information obtained through Employees connected with the Company, while in employment or even after separating from the services of the Company.
- Employees are expected to dedicate their full professional efforts and energies to their roles within the company during designated work hours. Engaging in any external work that conflicts with or may compromise the employee's obligations, performance, or confidentiality within the company is not permitted.
- Employee shall not use Company's assets or facilities for their personal benefit. Company's assets or facilities referred to in this policy includes but is not limited to computer hardware and software, communications facilities and Company provided access to the Internet.
- Employee shall be responsible for protecting the company's Intellectual property, Copyrights and Proprietary information. Proprietary information is any information created, acquired or controlled by the Company, which the Company has determined should not be published or released to others. It includes, but is not limited to, financials, billing records, unannounced products and services, technical information, sales and marketing data and employee records.
- Employee shall also protect the proprietary information and copyrights of the Company's business partners or products used by the company.

- Employee shall not seek to own or acquire property or interests using confidential or unpublished Company information. Employees should not attempt to own any interest or property where the value of the property is likely to be influenced by Company's action.
- Employee shall not convert business opportunities, which are reasonably anticipated to be of interest to the company, for his or her own benefit, nor diverted by the Employee for the benefit of others.
- Employees shall not own (directly or indirectly) material interest in the enterprise of a competitor of the Company. In addition, no Employee should act as a director, office partner, consultant, employee or agent of any enterprise in competition with the Company or its business partners. When an Employee leaves the Company, all the documents and records containing proprietary information must be returned to the Company.
- Even after employment ends, the former Employee will continue to be obliged not to divulge any proprietary information to any other person, party or competitor for a period of one year from the date of separation from the Company.
- If an Employee is in doubt of any proposed activity or action which will adversely affect the Company's interest or violates this Policy, he / she must check the proposed activity with the Management through their supervisor. An Employee will proceed to undertake any such proposed activity or action only after obtaining approval from the Management.
- You shall neither directly or indirectly work or do consultancy or engage in any such services for any organization, company or firm which is a subsidiary or parent of a company which is in direct competition to the business of Minfy for a period of one year from the date of leaving the services of the company.

Non-Solicitation

While you are employed by Minfy and for one-year period after leaving the services of the company, for any reason whatsoever, you will not without prior written permission from the company directly or indirectly (whether alone or as a partner, joint ventures, consultant, officer, director, investor, employee, agent or independent contractor) whether for yourself or on behalf of any other person or entity actually or attempt to:

- Solicit, persuade, hire or employ any employee of Minfy.
- Solicit business from any Minfy customers or potential customers on whose account or with whom you dealt with while in employment, for a similar business/activity, which is in competition with Minfy.
- Knowingly permit any person or entity that employs you or that is directly or indirectly controlled by you to engage in any of the conduct prohibited by this Non-Solicitation section

Our Integrity

Protecting Our Assets

We each have a duty to look after and respect all of Minfy's assets (If any) – namely our place of work, computer and telephone, company vehicle, finances or supplies you may have access to and even our working time. We should protect Minfy's assets from misuse, theft and waste. We must also ensure other companies cannot gain an unfair advantage by accessing important information about our business.

You should:

- Use Company resources responsibly and appropriately.
- Ensure hardware, such as laptops, phones and other handheld devices, are never left in public or insecure places.
- Ensure that all sensitive, confidential and personal information you may handle stays secure.
- Ensure business expenditure is accurately and honestly accounted-for.
- If you have any questions please contact your IT support team.

Information Management & Security

Information is one of our most valuable assets. We must do all we can to protect it. We must demonstrate to our partners and clients that we handle their information with care and integrity. Information has many forms from email, databases, voicemail and websites through to paper-based communication, photos and videos. Whatever its format, information and passwords must always be appropriately protected.

Data Protection & Confidential Information

The very nature of our business means we handle personal and confidential information about our employees, partners and clients every day. We have an important duty to respect this information and ensure it is protected and handled responsibly and only used for the purposes for which it is provided. We take our obligations under data protection and privacy laws across the world very seriously.

You must always:

- Only use personal information for the business purpose for which it was supplied (for example: the provision of recruitment services) with the written consent of the provider.

- Ensure personal information is secure at all times and is relevant, accurate and kept up to date.

Communicating with the Outside World

Any communication with external stakeholders, such as our clients, shareholders, partners or even the media, must be clear and truthful. We urge you to take care when using social media and email. Remember that once you have made a public statement you have no control over what happens to it or who uses it. All external communication must be approved by the Marketing team. Internal communication is equally important as this can easily make it into the outside world. Always be aware that your actual audience might not be the one you intended to address.