



ADITYA BIRLA GROUP

Information Security Code of Conduct

Version 1.0

2017

1 Information Security Code of Conduct

This document outlines policies for acceptable use of Aditya Birla Group's Information and Information Systems (defined hereinafter).

1.1 Objective

The purpose of this policy is to ensure that all users use the Aditya Birla Group Information and Information Systems in a professional, ethical, and lawful manner in furtherance of the interests of the Aditya Birla Group.

1.2 Scope and Applicability

For the purpose of this policy,

"Aditya Birla Group" collectively refers to all the legal entities belonging to the Aditya Birla Conglomerate and as further stated on its website <http://adityabirla.com/Businesses/companies>.

"Company" or "Unit" refers individually to each legal entity within Aditya Birla Group.

"Aditya Birla Group's Information Systems" include any application, computer, server, electronic media, communication devices network, Information Technology services (including cloud, internet, intranet & email) provided, supported, procured, leased, or used by Aditya Birla Group. The policy set forth herein also shall apply to any service or device (including personal computing devices such as smart phones, tablets etc.) owned or procured by the user and used for accessing Aditya Birla Group Information and Information Systems.

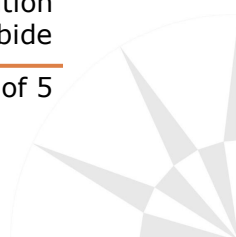
"Aditya Birla Group's Information" includes any kind of information or data (including internet, email, SMS, instant messaging, etc.), whether tangible or intangible, contained in or stored on Aditya Birla Group's Information Systems.

A "user" of the Aditya Birla Group's Information System is any Person (including employees, trainees, contractors, and third parties) who has been provided access to Aditya Birla Group's Information Systems.

A "Person" for the purpose of this policy shall include an individual, corporation, limited liability company, partnership, association, joint venture, trust, unincorporated organization, or other entity not part of the Aditya Birla Group, including any governmental entity.

1.3 Policy Statements

1. Aditya Birla Group's Information Systems are to be used only for processing data and information relating to the Aditya Birla Group's business and obtained through legal means. Any use of the Aditya Birla Group's Information and Information Systems for any direct or indirect personal illicit gain is strictly prohibited.
2. Users are responsible for protecting Aditya Birla Group's Information in their possession including information stored on the Aditya Birla Group's Information Systems to which such users have access. Additionally, users are obligated to abide



- by the lawful policies and procedures of all networks and systems with which they communicate, technically support, and/ or utilize.
3. Based on the data classification norms adopted by relevant Company or Unit from time to time, the Aditya Birla Group's Information must be classified appropriately based on its nature, value, criticality, sensitivity, and legal requirements, and considering the impact to the Aditya Birla Group if such information were disclosed to a third party, altered, or destroyed without authorization. All users must handle the Aditya Birla Group's Information strictly as per its classification.
 4. Users shall not attempt to access any data or programs contained on the Aditya Birla Group's Information Systems for which they do not have authorization or explicit consent of the data owner.
 5. Users shall not use the Aditya Birla Group Information Systems in a manner that would violate any applicable law, regulation or any Aditya Birla policies or procedures.
 6. Users shall not use the Aditya Birla Group's Information Systems for any activity with an intent of:
 - a) discriminating, harassing, vilifying or victimizing others based on gender, race, religious beliefs, disability, political conviction, sexual preferences, age, or otherwise;
 - b) degrading the performance of the Aditya Birla Group's Information Systems;
 - c) gaining access to any Aditya Birla Group's Information System for which proper authorization has not been given;
 - d) depriving an authorized user access to an authorized Aditya Birla Group's Information System;
 - e) attempting to gain more system access or privileges than authorized;
 - f) circumventing the security measures governing the Aditya Birla Group's Information or the Aditya Birla Group's Information Systems;
 - g) sharing information with a Person outside the Aditya Birla Group, which will allow the circumvention of the Aditya Birla Group's security systems or the infiltration of the Aditya Birla Group's Information Systems by such third party; and
 - h) causing physical or other damage to the Aditya Birla Group's Information Systems or property.
 7. Users must ensure that devices (e.g., desktops, laptops, tablets, phones, etc.) used for accessing Aditya Birla Group Information or in furtherance of the business of the Company or Unit are duly secured, sanitized and supervised by relevant Company or Unit and are used in compliance with the Aditya Birla Group's information security policy. Users shall take due care to protect such devices and the official data stored therein from loss, theft and misuse. Loss/theft of such devices should be immediately notified to the respective Managers, Chief Information Security Officer (CISO), and/or the Chief Information Officer (CIO) of their respective Company or Unit, so that official data stored therein is prevented from any misuse.
 8. Users shall familiarize themselves with the contents of the Aditya Birla Group's information security policy, which is available on ABG Onstream (and any updates to these) and adhere to the same. Users should address any questions or concerns regarding such policy or the users' use of the Aditya Birla Group's Information Systems or the Aditya Birla Groups Information to their respective Managers, Chief Information Security Officer (CISO), and/or the Chief Information Officer (CIO) of their respective Company or Unit.



9. Users shall comply with Aditya Birla Group's security directives, guidelines, and policies at all times. Users shall not circumvent or attempt to circumvent any logical or physical security controls or guidelines issued by Aditya Birla Group or the Company. Additionally, users shall proactively participate in all security and safety exercises, drills, and training that may be conducted from time to time by the Aditya Birla Group or the Company.
10. Users shall not download or install any unauthorized software onto any Aditya Birla Group's Information System where by any Aditya Birla Group's Information is stored.
11. Users shall not make copies of copyrighted software, unless permitted by the copyright owner. As used herein, "copyright owner" refers to the Person which possesses the exclusive right to make copies, license, and otherwise exploit a literary, business, musical, or artistic work, whether printed, audio, video, etc.
12. At all times, users are responsible for the content that they download, store, post, or transmit using Aditya Birla Group Information Systems, including mobile computing devices. Subject to allowable exemptions, copyrighted materials belonging to any Person outside the Aditya Birla Group shall not be, transmitted by employees on Aditya Birla Group Information Systems. All users obtaining access to third party information or materials must respect all copyrights and shall not copy, retrieve, modify, or forward copyrighted materials, except with written permission of the copyright owner, or as may be permitted by applicable law. Each user shall observe all terms and conditions of the applicable license agreement under which a license to use any copyrighted work has been obtained.
13. Users shall not use Aditya Birla Group's Information Systems to store any unpublished, confidential, or price-sensitive information belonging to a Person outside the Aditya Birla Group unless such usage or storage has been duly approved by the owner of such information. A user shall be personally liable for any unauthorized use or storage of such third party information.
14. Use of any communication facilities not provided or authorized by the Aditya Birla Group for any official communication is prohibited. Users shall not use any unauthorized e-mail services, instant messengers, or communication facilities for the transmission, storage, or retrieval of Aditya Birla Group's Information.
15. Users shall be responsible for managing their respective mail boxes effectively and in compliance with this Information Security Code of Conduct. Subject to applicable rules, policies, and procedures governing the retention, management, and destruction of e-mails and the Aditya Birla Group's Information, users may maintain specific emails in case of business need.
16. Messages or information sent by a user to a Person outside the Aditya Birla Group via any Aditya Birla Group's Information System (including any communication utilizing or travelling over an electronic network owned or leased by the Aditya Birla Group), constitute statements that reflect on Aditya Birla Group. Therefore, all such communication should be done in a manner that respects the Aditya Birla Group's security and image.
17. Users shall treat the personal data of the Aditya Birla Group's employees, customers and business partners fairly and lawfully. Users entrusted with the task of collecting personal data shall do so only for specific, lawful, explicit, and legitimate purposes in furtherance of the Aditya Birla Group's business. Further users shall process such data consistent with those purposes.
18. Users shall not, without the prior consent of the Company, divulge the Company's confidential information, whether electronic, oral, or written, to any third party or for any purpose other than the benefit of the Company and Aditya Birla Group.



19. The Aditya Birla Group routinely monitors usage patterns for its e-mail/Internet communications and other IT services and systems. All messages created, stored, sent, or retrieved over the Aditya Birla Group's Information Systems are the property of the Aditya Birla Group and shall not be considered private information. The Aditya Birla Group reserves the right to access and monitor all electronic messages, and soft or hard copy files of the user's communications at all times in accordance with the relevant laws of the country.
20. Users will be held responsible and liable for any defamatory, obscene, offensive, political, proprietary, copyrighted, or libelous content they may post, propagate, transmit, or store using the Aditya Birla Group's Information Systems or any personal computing devices, email, social media, or blog sites. Third parties may pursue legal action against individuals personally for the content uploaded onto such social media platforms.
21. If a user becomes aware of any weaknesses in the security of the Aditya Birla Group's Information Systems or of any incidents of possible misuse or violation of this policy, such user shall report the same to her/his manager or CISO.

1.4 Disciplinary Actions

1. Aditya Birla Group or the company may take any breach of this policy as a sign of misconduct by the user and the user may be subject to the following:
 - a) Verbal or written warning;
 - b) Counselling;
 - c) Withdrawal of access and system privileges in part or whole; and
 - d) Any combination of above.
2. Serious or repeated breach of this policy can be construed as gross misconduct and disciplinary actions may include:
 - a) Dismissal;
 - b) Loss of benefits;
 - c) Legal proceedings in accordance with applicable laws; and
 - d) Any combination of the above.



2 User Agreement

Information Security Code of Conduct

I have received a copy of Aditya Birla Group's Information Security Code of Conduct. I have read the aforementioned document and I understand it and agree to abide by policies that are set forth therein.

I recognize and understand that the Aditya Birla Group's Information Systems are to be used for conducting the Aditya Birla Group's business only. I am aware that the Aditya Birla Group may access and review any materials stored on my workstation, handheld devices, USB drives, or any other storage devices, or any information sent or received by me through or utilizing the Aditya Birla Group network, e-mail system, or Internet connection in accordance with the relevant laws of the country.

I understand that this Information Security Code of Conduct applies to me, and I am aware that any violation of this policy may subject me to disciplinary action, up to and including the termination of my employment as well as legal action.

I agree to indemnify, defend, and hold harmless the Aditya Birla Group, its companies, and their officers and other employees from and against any damage, harm, and liability arising out of a breach of this policy by me or due to any negligence on my part.

Furthermore, I understand that this policy may be amended at any time by the Aditya Birla Group or the Company. I further acknowledge that any future changes to this policy may be communicated to me through physical or electronic means.

