

## **CODE OF CONDUCT & BUSINESS ETHICS**

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## **CODE OF CONDUCT & BUSINESS ETHICS**

### **1. GENERAL PHILOSOPHY**

This Code of Conduct and Business Ethics applies to all employees and officers of the subsidiaries and affiliates of Zettaone Technologies India Private Limited, which are referred to in this Code as Company or the Company.

The Company is proud of its reputation for integrity and honesty and is committed to these core values. Personal responsibility is at the core of the Company's principles and culture. The Company's reputation depends on you maintaining the highest standards of conduct in all business endeavors. You have a personal responsibility to protect this reputation, to "do the right thing," and to act with honesty and integrity in all dealings with customers, business partners and each other. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

This Code is intended to focus the attention of each Employee on their conduct, provide guidance relating to handling of conflict of interest ethical issues, provide mechanism to report potential conflicts or unethical conduct and help foster a culture of honesty & accountability. The Company respects the local, state and national laws in the countries in which it operates. This Code will be administered in accordance with those local, state and national laws. Each Employee of the Company is expected to comply with the letter and spirit of this Code.

The Employees of the Company must not only comply with applicable laws, rules and regulations but should also promote honest and ethical conduct of the business. They must abide by the policies and procedures that govern the conduct of the Company's business. Their responsibilities include helping to create and maintain a culture of high ethical standards and commitment to compliance. This Code contains general guidelines to Employees for conducting the business of the Company consistent with the highest standards of business ethics.

The Company's reputation is, its most asset. How we conduct ourselves day to day with each other, our customers, our shareholders, our competitors and our suppliers is the basis of our reputation as an ethical group. We ought to consistently observe the highest standards of behaviour and integrity to maintain this reputation. The actions of every Employee affect the reputation and integrity of the Company. Therefore, it is essential that each Employee takes the time to review this Code and develop a working knowledge of its provisions.

This Code is not intended to be a comprehensive rulebook and cannot address every situation that employees may face. The underlying rule is that in our daily conduct, we must ensure that our actions and policies are not only legal, but also in line with the highest level of business ethics and personal integrity.

## **2. GENERAL REQUIREMENT**

### **2.1. Laws and regulations:**

All the units of the Company and the parties with whom the Company has dealings shall operate in full compliance with relevant laws and regulations applicable to their operations and employment in the countries in which they operate. Violation of domestic or foreign laws and regulations may subject an Employee, as well as the Company, to civil and/or criminal penalties. To assure compliance with applicable laws and regulations, the Company has established various policies and procedures. Employees have an obligation to comply with these policies and procedures and to promptly alert a responsible supervisor, Legal Department, or other appropriate internal authority of any deviation from them.

Legal compliance is not intuitive. To comply with the law, Employees must learn enough about the national, state and local laws that affect their work at the Company to spot potential issues and to obtain proper guidance on the right way to proceed. When there is any doubt as to the lawfulness of any proposed activity, Employees should seek advice from the Company's Legal Department or appropriate authority.

### **2.2. Parties with whom Company has dealings:**

Employees engaged in business discussion with third parties such as consultants, agents, sales representatives, distributors, channel partners, contractors and suppliers, shall ensure that such third parties do not represent the Company without its prior written permission. Employees shall endeavour to ensure that the third parties which have business dealings with the Company, such as consultants, agents, sales representatives, distributors, channel partners, contractors and suppliers, abide by the Code in their interaction with the Company.

It is also the responsibility of the Employees to familiarize and bind all third parties, including sub-contractors with the Company's Code and comply with the same to the extent possible while representing the Company.

### **3. STAKEHOLDERS**

The Company shall be committed to enhancing Board of Directors value and complying with all regulations and laws that govern their rights. The Company offers its stakeholders and members open, honest and timely information of the Company, its activities.

### **4. CONFLICTS OF INTEREST AND GIFTS**

Employees shall avoid conflicts of interest between himself / themselves and the Company. Any situation that involves or may reasonably be expected to involve, a conflict of interest with the Company, should be disclosed promptly to the next level in the hierarchy of the Company, who shall address / take appropriate action and if necessary he/she will inform the same to the next level in the hierarchy of the Company.

For the Company to operate in a fair and open manner, it is very important that every Employee avoids any situation or interest which might interfere with his/her judgment regarding his/her responsibilities to the Company, other employees, customers, vendors and other parties.

Some of the conflicts (illustrative but not exhaustive) from which an Employee must refrain are set out below:

- a) Solicit or accept from customers, suppliers or others dealing with the Company any kind of gift or other personal, unearned benefits as a result of Employees' position or relationship with respect to the Company (other than non-monetary items of nominal intrinsic value). However, souvenirs / nominal gifts received up to a value of Rs. 1,000/-, which are customarily given and are of commemorative nature for special events, will not be considered as an instance of conflict of interest. For accepting any gifts or souvenirs above the value of Rs. 1,000/- prior written approval from the Department Head or the Senior Management is necessary;
- b) Have a financial interest in the Company's competitors, customers, suppliers or others dealing with the Company, which is likely to be a reason to exercise influence or affect his/her judgment;
- c) Have a consulting, managerial or employment relationship with a competitor, customer, supplier or others dealing with the Company;
- d) Acquire real property, leaseholds, patents or other property or rights in which the Company has, or Employee knows or have reason to believe at the time of acquisition that the Company is likely to have, an interest related to the business of the Company;  
or

- e) Have a material interest in a transaction involving indebtedness or a guarantee of indebtedness (excluding amounts due for purchases of goods and services subject to usual trade terms, for ordinary business travel and expense payments and for other transactions in the ordinary course of business).

Employees should be scrupulous in avoiding 'conflicts of interest' with the Company. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the next level in hierarchy of the Company and a prior written approval should be obtained therefrom.

If an Employee's immediate family member is employed by a client or potential client of Company or otherwise involved in or in a position to influence a client or potential client's procurement of company's products or services, the Employee is required to notify reporting authority.

In all instances where the appearance of a conflict exists, the Employee must disclose the nature of the conflict to Human Resources or the Legal Department or reporting authority. Company policy prohibits conflicts of interest, except as approved by:

**The Board of Directors, with respect to conflicts of interest related to directors, director nominees and executive officers; or Senior management, with respect to conflicts of interest related to all other persons.**

## **5. PROTECTION AND PROPER USE OF COMPANY ASSETS**

Each Employee has a personal responsibility to protect the assets of the Company from misuse or misappropriation. The assets of the Company include tangible assets, such as products, equipment and facilities, as well as intangible assets, such as corporate opportunities, intellectual property, trade secrets and business information (including any non-public information learned as an employee, officer or director of the Company).

- 5.1. Employees should protect the Company's Property and ensure their efficient use for legitimate business purposes only;
- 5.2. Company Property includes Company funds, all written communications and all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems;

- 5.3. The use of Company Property, whether for personal gain, for any unlawful or improper purpose is prohibited;
- 5.4. To ensure the protection and proper use of the Company's Property, each Employee should;
- a) Exercise due care to prevent theft, damage or misuse of Company Property;
  - b) Report the actual or suspected theft, damage or misuse of Company Property to their supervisor;
  - c) Use the Company's telephone system, other electronic communication services, written materials and other Property, primarily for business-related purposes.
- 5.5. As per Company Policy, only licensed software is permitted to be used across the organization. Employees shall not do any act which would result in unlicensed software being downloaded on any computer provided by the Company or use any unlicensed software for or in connection with the Company's business;
- 5.6 The Employees are instructed to make use of authorized and / or licensed software only, provided by the Company, in the laptops / desktops provided. Usage of pirated software is strictly prohibited and will amount to violation of company's policies;
- 5.7. Safeguard all electronic programs, data, communications and written materials from inadvertent access by others;
- 5.8. Use Company property only for legitimate business purposes, as authorized in connection with their job responsibilities; and
- 5.9. The use of the "Zettaone" name and trademark shall be governed by manuals, codes and agreements and Employees are not permitted to use the name "Zettaone" in furtherance of any business interest in manner not authorized by the Company. No third party or joint venture shall use the "Zettaone" brand to further its interests without specific authorization.

#### 5.10 Theft/Misuse of Company Assets

The company's assets may only be used for business purposes and such other purposes as are approved by the Company. Employees must not take, make use of, or knowingly misappropriate the assets of the Company, for personal use, for use by another, or for an improper or illegal purpose. Employees are not permitted to remove dispose of, or destroy anything of value belonging to the Company without the company's express prior written consent, including both physical items and electronic information.



## **6. NETWORK USE, INTEGRITY & SECURITY**

This section is intended to supplement any other information security policy Company may have. Internet, intranet and external and internal E-mail access provided by the Company shall only be used for business related or other permitted purposes and in conformity with the Company's security policy and procedures and applicable laws and regulations. These facilities shall not be used in any way that might bring the Company or its management into disrepute or cause them embarrassment. The Company reserves the right to monitor or review any and all data and information contained on any Employee's computer or other electronic device issued by the Company. In addition, the Company reserves the right to monitor or review an Employee's use of the Internet, Company Intranet and Company e-mail or any other electronic communications without prior notice, to the extent permitted by local law.

Access to Company systems will be revoked and disciplinary action may be taken if such systems are used to commit illegal acts, or to violate the non-discrimination, harassment, pornography, solicitation or proprietary information terms of this Code, or any other terms of this Code.

To maintain systems integrity and protect the Company network, no employee or officer should divulge any passwords used to access any Company computer or database. All Employees should refrain from using or distributing software that may damage or disrupt the company's work environment by transmitting a virus or conflicting with Company systems.

No Employee should engage in the unauthorized use, copying, distribution or alteration of computer software whether obtained from outside sources or developed internally. All software contains terms of use that must be adhered to.

Any suspected breach of the company's network security systems should be reported to a responsible supervisor or appropriate internal authority immediately.

## **7. FINANCIAL REPORTING AND RECORDS**

The Company is required to prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the Company conducts its business affairs.

employees shall ensure that there shall be no willful omissions of any of the company's transactions from the books and records of the Company. Any willful material misrepresentation of and/or misinformation on the financial accounts and reports shall be



regarded as a violation of the code. Each Employee is expected to comply always with the company's Delegation of Authority Policy, which provides for corporate signature authority, and the company's reservation of authority policy, which provides for corporate approval limits.

If the Employee(s) are authorized to make expenditures or enter into transactions on behalf of the Company, they must ensure that they have obtained proper approvals from their respective Managers and the bills are handed over to the Accounts Department with prior signature of their respective Managers towards any purchases immediately to avoid missing the transaction to record.

Any questions about these policies should be directed to the company's Human resource department.

## **8. LOANS AND GUARANTEES**

Each Employee and their immediate family members must not accept loans or guarantees of obligations (except from banks or other entities that provide such services in the normal course and at arms' length) from any individual, organization or entity doing or seeking to do business with the Company. The Employee should report any offer of such a loan to a responsible supervisor, the Human Resources Officer or other appropriate internal authority.

## **9. OUTSIDE EMPLOYMENT, MEMBERSHIP ON OUTSIDE COMMITTEES**

The Company's Employees are expected to devote their full time and attention to the company's business during their regular scheduled working hours and for whatever additional time may be required. Outside business activities can easily create conflicts of interest or diminish productivity and effectiveness. For these reasons, Employees should avoid outside business activities that divert their time and talents from the company's business. Though the Company encourages professional development activities and community involvement, special care must be taken not to compromise duties owed to the Company.

Each Employee must obtain approval from the Human Resources Department or the Board, as appropriate, before agreeing to serve on the board of directors or similar body of any for-profit or not for profit enterprise or government agency.

## **10. POLITICAL AND OTHER OUTSIDE ACTIVITIES**

The Company is committed to and supports the constitution and governance systems of the country in which it operates. The Company shall not support any specific political party or candidate for political office. The Company's conduct shall preclude any activity that could be interpreted as mutual dependence / favor with any political body or person and shall

not offer or give any Company funds or property as donations to any political party, candidate or campaign.

In addition, prior to seeking any election or appointment to public office, the Employee must notify the Human Resources Department to clarify the Company's position in the event the candidacy is successful, or the appointment is made.

Subject to the limitations imposed by this Code, each Employee is free to engage in outside activities that do not interfere with the performance of his or her responsibilities or otherwise conflict with the Company's interests. Where activities may be of a controversial or sensitive nature, Employees and officers are expected to seek the guidance of Human Resources Department or authorized person before engaging in such activities. The Employees must not use their Company position or title or any Company equipment, supplies or facilities in connection with outside activities, nor may they do anything that might infer sponsorship or support by the Company of such activity, unless such use has been approved in writing by the Legal Department.

## **11. BRIBERY AND OTHER CORRUPT PRACTICES**

The Company is committed to acting with integrity in all of our business relationships. We compete for business solely on the basis of the quality of the products and services we deliver. As such, we do not tolerate or condone bribery. Bribery is a criminal offense in India and in all the countries in which the Company and its affiliates operate. Bribery subjects the Company and its employees to significant legal and reputational liability. Any Employee of the Company who engages in or facilitates bribery will be subject to discipline, up to and including dismissal, and also faces significant legal consequences, including prison.

The Company strictly prohibits giving, authorizing or promising anything of value to any person, including a government official, for any improper purpose, such as to obtain or retain business, secure an improper advantage, influence a decision or act, or cause the

intended recipient to act improperly or in breach of a duty of trust. Similarly, no employee, officer or director of the Company may request, agree to receive or accept a financial or other advantage in connection with their employment or relationship with the Company.

The offer or payment of anything of value may constitute a bribe, no matter how small the amount. "Facilitation" payments are payments made to expedite routine government actions, such as processing visa, customs paperwork and so on. These payments are illegal in every country in which they are made and are therefore prohibited under this policy.

The Company and its employees may be held criminally liable for bribery and improper payments made by third parties, such as consultants and agents, acting on behalf of the Company. For this reason, the Company will only engage third parties who are both reputable and qualified and who meet our standards for ethical commercial transactions. The Company will follow a documented due diligence process for those third parties that pose a risk of non-compliance with bribery laws.

Every Employee of the Company is responsible for reading and understanding this policy. Every Employee of the Company has a duty to report violations of these policies and procedures, as well as any behaviour conducted by any Employee or third party that reasonably appears to be contrary to these principles.

## **12. OTHER IMPROPER PAYMENTS AND BUSINESS DEALINGS**

Each Employee is prohibited from offering or providing, directly or indirectly: (i) anything of value (including cash, bribes, kickbacks or other improper payments) to any client or prospective client's employee or representative or other third party in connection with any procurement, transaction or business dealing for the Company, or (ii) any consulting, employment or similar position to any client or prospective client's employee (or family member or significant other) involved with procurement for the client or prospective client. Further every Employee is required to know or inquire about the business entertainment, gift or contest policies of a client or prospective client and to comply with such policies, before offering or providing any client or prospective client with business entertainment, a nominal gift or an opportunity to participate in a transaction or a business deal.

## **13. CONFIDENTIALITY**

The Employees shall maintain the confidentiality of confidential information of the Company or that of any customer, vendor or business associate of the Company to which Company has a duty to maintain confidentiality, except when disclosure is authorized or legally mandated. The Company's confidential and proprietary information shall not be disclosed or used for the personal gain or advantage of any Employee. These obligations apply during the Employee's term and for a period of three years thereafter.

The Confidential information includes all non-public information (including private, proprietary and other) that might be of use to competitors or harmful to the Company. The use of confidential information for his/her own advantage or profit is also prohibited.

#### **14. DATA PRIVACY**

Most countries have data privacy laws regulating the collection and use of personal data, which is any information that directly or indirectly identifies a natural person, although the types of data covered the nature of the protection and local enforcement mechanisms vary. Examples of personal data include personal, employment, medical, financial and education and training information. All Employees are responsible for ensuring compliance with the data privacy requirements under the laws, rules and regulations of the applicable countries.

#### **15. FAIR DEALING**

In carrying out their duties and responsibilities, Employees should endeavour to deal fairly, and should promote fair dealing by the Company, its employees and agents, with customers, vendors and employees. Employees must not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. The Company respects the confidentiality and privacy of its suppliers and customers. Information about the Company's suppliers, customers, competitors and employees must be used in an ethical manner and in compliance with the law. Under no circumstance should information be obtained through theft, illegal entry, blackmail, electronic eavesdropping or through misrepresenting affiliation with the Company or identity. Any confidential or proprietary information should not be used if it is suspected that such information has been obtained improperly.

Similarly, each Employee must respect and protect any confidential or proprietary information shared with the Company unless disclosure is necessary to comply with statutory requirements, court orders or other lawful process or properly authorized government investigations. This information should not be released without proper authorization and should be used for legitimate business purposes only. Employees and officers should not divulge any confidential or proprietary information about their former employers, nor shall any Employee ever ask them to. Customers and potential customers are entitled to receive accurate information regarding prices, capabilities, terms and scheduling. The Company strives to produce advertisements that are fair, accurate and lawful. False or misleading statements to sell or market Company products or services are to be strictly avoided. Immediate efforts should be made to correct any misunderstanding that may exist with a customer or potential customer.

## **16. COMPETITION**

The Company shall fully support the development and operation of competitive open markets and shall promote the liberalisation of trade and investment in each country and market in which it operates. Specifically, Employees shall not engage in activities and practices which amount to restrictive trade practices, abuse of market dominance or similar unfair trade activities.

The Employee shall market the Company's products and services on their own merits and shall not make unfair and misleading statements about competitors' products and services. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.

## **17. CORPORATE OPPORTUNITIES**

In carrying out their duties and responsibilities, Employees should avoid:

- a) Taking for themselves (or for their companies or other organizations in which they have financial or other interest) opportunities related to the Company's business).
- b) Using the Company's property or information for personal gain.
- c) Competing with the Company for business opportunities.
- d) accepting special investment opportunities (meaning investment opportunities that are made available to an Employee because of or in connection with their status as an employee or director of the Company) from a supplier, vendor (including banks or financial advisers), or customer with whom the Company is doing business or that is seeking to sell products or services to the Company without first disclosing the opportunity to the Company's Legal/Secretarial Department.

## **18. PUBLIC REPRESENTATION OF COMPANY**

The Management of the Company will appoint one or more Sr. level officer(s) of the Company as „Spokesperson“ who would interact with the media/ radio/ press / journals / periodicals. No Employee, except with the permission of board of directors the Company will make any statement in media/ radio/ press / journals / periodicals or give any interviews or opinions on matters which are concerning the Company or mentioning the Company. Employees shall vouch for the reputation and integrity of the Company and refrain from criticizing the Company in any article / in radio/ TV broadcast etc.



In the event any Employee has to give any interview or opinion to the media/radio/ press or journal, the entire content of such interaction to be disclosed shall be first verified and confirmed by the authorized person or board director of the Company.

## **20. HEALTH, SAFETY AND ENVIRONMENT**

The Company shall strive to provide a safe, healthy, clean and ergonomic working environment for its people. It shall prevent the wasteful use of natural resources and be committed to improving the environment, particularly about the emission of greenhouse gases, and shall endeavour to offset the effect of climate change in all spheres of its activities.

The Company, in the process of production and sale of its products and services, shall strive for economic, social and environmental sustainability.

## **21. EQUAL OPPORTUNITIES EMPLOYER AND AFFIRMATIVE WORKPLACE**

The Company is an equal opportunity employer and bases its recruitment, employment, development and promotion decisions solely on a person's ability and potential in relation to the needs of the job, and complies with local, state and central employment laws.

Every Employee shall be duty bound to respect the personal dignity, privacy, and personal rights of every other employee or individual he or she meets during business or official dealings or otherwise.

Identification Card - The ID card is a resource for visual inspection to make sure that authorized personnel are entering the premises. It enables to track all employees and visitors who enter and exit the office premises.

It is mandatory that each employee must display his/her ID cards provided by the Company.

The Company is committed to a workplace that is free from sexual, racial, or other unlawful harassment, and from threats or acts of violence or physical intimidation. Abusive, harassing or other offensive conduct is unacceptable, whether verbal, physical or visual. The Company shall not tolerate any discriminatory conduct, abuse of authority, or harassment of any kind, including that of sexual in nature. Employees must refrain from making jokes, slurs or other remarks that are about race, colour, religion, gender, age, nationality or ethnic origin, sexual orientation, marital status and disabilities, that can encourage or create an offensive or hostile environment. If an Employee believes that they have been harassed or threatened with or subjected to physical violence in or related to the



workplace, they should report the incident to an appropriate supervisor or Human Resources Department or to a member of the Internal Complaints Committee, who will arrange for it to be investigated. All efforts will be made to handle the investigation confidentially.

The Company will not tolerate the possession, use or distribution of pornographic, racist, sexist or otherwise offensive materials on Company property, or the use of Company personal computers or other equipment to obtain or view such materials. All Employees must promptly contact an appropriate supervisor or Human Resources Department about the existence of offensive materials on the Company's systems or premises so that appropriate action may be taken, including notifying the proper authorities if necessary.

The Company is committed to providing a drug-free work environment. The illegal possession, distribution, or use of any controlled substances on Company premises or at Company functions is strictly prohibited. Similarly, reporting to work under the influence of any illegal drugs or alcohol and the abuse of alcohol or drugs in the workplace is not in the Company's interest and violates this Code.

All accidents, injuries, or concerns about unsafe equipment, practices, conditions or other potential hazards should be immediately reported to an appropriate supervisor.

## **22. JUDICIAL ORDERS AND GOVERNMENT INVESTIGATIONS**

As a general matter, it is the Company's policy to cooperate in any government investigations and inquiries. All judicial, quasi-judicial information, document requests, or other inquiries must be referred immediately to the Company's Legal Department or authorized person.

All calls or inquiries from external lawyers must be referred immediately to the Company's Legal Department or Management.

## **23. COMPLIANCE WITH CODE OF CONDUCT**

If any Employee who knows of or suspects of a violation of applicable laws, rules or regulations or of this Code, he/she must immediately report the same to the next level in the hierarchy of the Company who shall address / take appropriate action and if necessary he/she will inform the same to the next level in the hierarchy of the Company. Such person should as far as possible provide the details of suspected violations with all known relating to the issue. The Company recognizes that resolving such problems or concerns will advance the overall interests of the Company that will help to safeguard the Company's assets, financial integrity and reputation.

It is the Company's policy to encourage the communication of bona fide concerns relating to the lawful and ethical conduct of business, and audit and accounting procedures or related matters. It is also the policy of the Company to protect those who communicate bona fide concerns from any retaliation for such reporting. No retribution against any

individual who reports violations of this Code in good faith will be permitted. All disclosures by any Employee or personnel shall be treated confidential and anonymous by the Senior Management or the immediate supervisor. Every effort will be made to investigate confidential and anonymous reports within the confines of the limits on information or disclosure such reports entail. While self-reporting a violation will not excuse the violation itself, the extent and promptness of such reporting will be considered in determining any appropriate sanction, including dismissal. The Company will investigate any matter which is reported and will take any appropriate corrective action.

## **24. VIOLATIONS OF THIS CODE**

Allegations of Code violations will be reviewed and investigated by the Company's Legal Department and Human Resources Department or, in appropriate circumstances by other officers designated by the Company. Violations of this Code may result in, among other actions, suspension of work duties, diminution of responsibilities or demotion and termination of employment.

Those who violate the standards in this Code will be subject to disciplinary action. Failure to follow this Code or to comply with central, state, local and any applicable foreign laws, and the Company's corporate policies and procedures may result in termination of employment or termination of board service.

## **25. WAIVER AND AMENDMENTS OF THE CODE**

The Company is committed to continuously review and update its policies and procedures. Therefore, this Code is subject to modification. From time to time, the Company may in limited circumstances waive some provisions of this Code to address equitable concerns raised to the Senior Management or the Board of the Company. Such waivers will not be granted unless necessary and warranted and will only be done in a limited and qualified manner.

## **WHO DO I CONTACT**

### **FOR GUIDANCE OR TO REPORT CONCERNS?**

If an Employee believes a situation may involve or lead to a violation of this Code, they have an affirmative duty to seek guidance and report such concerns.

- a) Seek guidance from a responsible supervisor (for example, immediate supervisor, a department head or location manager) or other appropriate internal authority (for example, the Human Resources Department).
- b) Disclose concerns or violations Code to the Human Resources Officer or the Legal Department

It is the Company's policy to encourage the communication of bona fide concerns relating to the lawful and ethical conduct of business and related matters. It is also the policy of the Company to protect those who communicate bona fide concerns from any retaliation for such reporting.

No Company policy can provide definitive answers to all questions. It is difficult to anticipate every decision or action that an Employee may face or consider. Whenever there is doubt about the right ethical or legal choice to make, or questions regarding any of the standards discussed or policies referenced in this Code, an Employee should fully disclose the circumstances, seek guidance about the right thing to do, and keep asking until guidance is obtained. The earlier a potential problem is detected and corrected; the better off the Company will be in protecting against harm to the Company's business and reputation.

### **Declaration:**

I Mr./Ms. .... hereby confirm that I will adhere to code of conduct.

Signature : .....:      Date    : ..... EMP ID .....