

CODE OF ETHICS POLICY

Objective:

The objective of code of conduct policy is to make sure that company code of conduct is followed in all its business. The organization is meant to form a work environment which is free from any kind of discrimination. It is also meant to make employees aware of corporate code of conduct which is expected from all employees of the company.

Purpose:

The purpose of this policy is to lay down rules and regulations regarding code of ethics and professional conduct so as to maintain the trust of employees in the organization they are working for and to increase transparency which in turn help bring good name to the company. This model code of conduct is planned to focus the employees on the fields related to any risk related to ethics, and to provide them with a solution which helps to deal with such issue and to help them build a culture of transparency and honesty.

Eligibility:

This Policy applies to all the regular employees of the company.

Clauses Covered under the Policy

Conflict of Interest:

The employees are supposed to work at all times in company's interest. There should not be any conflict where in employee personal or professional interest interferes with the interest of the company. Employees are expected not to involve themselves in any other business or activity which may affect their working in the company. As per the code of ethics example all employees have a sense of faithfulness towards the organization they are working for. Therefore, they must avoid any kind of situation which is contradictory for the interest of the company. There should not be any conflict of interest with the company. This is as per the model code of conduct.

A situation of conflict arises when an employee personal interest are interfering with his workings for the company effectively. Conflict of interest may also occur when an employee misuse his powers to receive improper personal benefits.

Conflict of interest may also occur when an employee is involved in double employment or accepting gifts of very high value for personal gains which may create a situation of conflict of interest.

Respectability:

It means the employee is following the code of conduct in the workplace. It includes their obedience towards the personal behavior which is expected from an employee in their work and interpersonal skills.

Privacy:

As per professional code of ethics an employee is suppose to keep the confidential information private. Due to employee position in the company they may come across some private and confidential information which is meant not to be shared with anyone inside or outside the company. Some undertaking regarding this must be filled in at the time of joining. Such information can be shared only when permitted by the senior management to do so. Any leakage of such information can be beneficiary to the competitor and it can be harmful to the company.

Privacy of financial particulars:

As per the company code of conduct a company is suppose to disclose the company's financial as per the accounting principle rules and regulations. All records of the company must clearly reflect the company's transactions.

Cheating:

Any kind of cheating as per the code of ethics definition is not allowed within the organization. Following will be considered as an act of cheating:

- Claiming reimbursement on false expense report
- Using company assets for personal gains
- Illegal transactions
- Double employment
- Sharing wrong data in company records for accounting purpose
- Sharing of confidential information
- Unfair dealings
- Non compliance with company's rules and regulations
- Documents forgery
- None reporting of illegal or unethical behavior.

Safety and security of company's property:

As per the code of conduct of employees they are required to maintain company's property with utmost care. Employees are responsible for keeping safe the company's property from any misuse, theft or any other act that result in the loss of property. The clause is also applicable in case of inventions and patents. It is also not allowed to dispose of any company property for personal gains.

Involvement in another business or employment:

According to corporate code of conduct an employee is suppose not to be engaged or interested in any other business or employment. All employees are supposed to devote their time and efforts to promote the company's business they are working for.

Harassment:

Any kind of harassment on account of age, sex, religion, race, caste, physical disability, marital status, gender is strictly prohibited. Employees are responsible to take all necessary actions and steps in term of support or preventive actions. This is as per the code of conduct at work.

Documents withholding:

All the documents related to senior management must be taken care of as per the documents policy. Documents should not be destroyed as they might be used for any future cause. Any document which is to be destroyed must be approved by senior management. This is according to the code of conduct in workplace.

Alcohol or illegal substance use:

All the employees are to be informed that use of alcohol or any other substance like illegal drugs etc is strictly prohibited.

Presents and Other profit:

As per the code of ethics example an employee must not accept or give any presents or gifts which might affect company's business decision. Any exchange of gifts with customers, suppliers is strictly prohibited. Any kind of direct or indirect bribe or inducements are not allowed. Any such acceptance will be the violation of code of conduct.

Abiding to the law, rules and regulations:

No inside trading of any kind is allowed within the company. Each employee of the company must abide to the rules and regulations of the organization. No trading is allowed in the company's securities.

Reporting of unethical or illegal behavior:

All unethical or illegal behavior must be reported to supervisor or senior management. In case employee is uncomfortable sharing it with supervisor or senior management in that case employee might approach the audit committee.

Job responsibility and control:

As per the code of conduct at work employees must do their job with integrity and honesty. Supervisors and managers must have proper control over the power assigned to them. In no case they are allowed to misuse it on their subordinates. Both managers and their subordinates to work in collaboration.

No Retaliation:

According to the code of conduct example their must not be retaliation against the employee who raises against any wrongdoing within the company. Any such act will be the violation of code of conduct. Raising a concern cannot be the basis of adverse employment.

Compete Fairly:

What is code of ethics? The code of ethics means following something within the limit of ethics. It goes out well when it comes to compete fairly. There should not be any deception or abuse of confidential information to have an edge over the competitor.

Career Opportunity:

According to the code of conduct for employees no employee is allowed to use any opportunity arising due to working within the company at higher position or using information for personal gains. No competing is allowed within the company.

Right dealing:

According to code of ethics and professional conduct all employees should deal rightly with the customers, supplier's internal and external customers. No one is allowed to take advantage of one's position and to deal wrongly by misrepresentation.

Attendance reporting:

According to the code of conduct for employees all attendance must be marked regularly. However in case an employee is unable to come to work for any reason supervisor must be contacted.

Social Media:

As per company code of ethics no content related to company should be posted on any site without approval from the senior management. No information regarding company's colleagues, vendors, suppliers are made public on social media. Also use of logo, trademark is strictly prohibited.

Job responsibility and control:

As per the code of conduct at work employees must do their job with integrity and honesty. Supervisors and managers must have proper control over the power assigned to them. In no case they are allowed to misuse it on their subordinates. Both managers and their subordinates to work in collaboration.

Anti bribery and money laundering:

As per the company code of ethics no employee is allowed to bribe anyone inside or outside the company. No bribe is allowed to be offered to any official for business reasons and for sake of unfair advantages. Money laundering is strictly prohibited within the organization.

Data Privacy:

Data collected from employees for internal purpose of the company such data should be kept private. It is as per the code of conduct of employees. However if need arises to share such data with an outside company, consent must be taken from employees before sharing. Once data has been used for relevant purpose and it is no longer required for any official purpose it must be destroyed as per company policy.

Environment & Sustainability:

Our code of conduct policy gives equal importance to environment protection and sustainability. We as a company give our best to preserve the environment. Regular education is given to our employees regarding environment conservation.

Failure to comply with code of conduct:

Any failure in order to comply with code of conduct must be dealt with strict punishment which might include loss of service or termination.

Revision of the policy:

The Company reserves the right to revise, modify any or all clauses of this policy depending upon demand of business.

Explanation of the policy:

Corporate HR department will be sole authority to interpret the content of this policy.

WORKFLOW :

